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Wisconsin Charter Schools Program 2022-23 Monitoring Visit Guide

Program authorized by CFDA #84.282A – *Title IV Part C of the Elementary and Secondary Education Act of 1965, as amended by the Every Student Succeeds Act of 2015 (ESSA).*

Purpose: The Department of Public Instruction (DPI) is responsible for ensuring federal Wisconsin Charter Schools Program (WCSP) requirements are met by subgrantees. The purpose of monitoring is to ensure your school is in full compliance and to identify areas where additional technical assistance may be needed. Your school will likely be issued corrective actions and provided technical assistance during this process. The documents the school submits and the focus groups held during the monitoring help DPI to determine whether each indicator and its criteria is met.

Directions: Complete all fields highlighted in yellow and provide all requested documentation in the school's assigned Google folder. All documentation must be completed and provided at least **ten business days prior to the scheduled monitoring visit**, as further instructed below. **All yellow fields must also be completed at least ten business days prior to the visit.**

The documentation schools must provide can be found in each indicator's box in the Documentation section.

- DPI creates a Google folder for each school that contains a sub-folder for each indicator.
- The folder link is sent to the charter school leader and governance board president one month prior to the monitoring visit.
- All documentation must be uploaded in the specified Google folder **at least ten business days** prior to the scheduled monitoring visit.
 - Links to documents should not be provided unless a link is specifically requested.
- The school's access to its monitoring Google folder will be restricted to "view only" **two days prior** to the monitoring visit.
- Documents should be uploaded into each of the indicator folders.

Providing information and documentation prior to the visit will allow the Department of Public Instruction (DPI) staff to review materials and compile any follow-up questions or concerns to be addressed during the visit. This will ensure the most efficient use of time during the visit.

Please note the sample questions provided in this document are only an example of some of the questions that may be asked during the visit and do not reflect all the questions that may be asked.

Questions asked during the focus groups are in addition to the questions, documentation, and policies, as described in this guide.

Each focus group should have between two and six individuals, and these individuals should be listed in the Visit Roster submitted. There should not be overlap between participants in the different groups. The Community Focus group may include representation from a variety of stakeholder groups including students in grade four and above, families, and community partners.

School Name	
Authorizer	
Date of Visit	

OVERVIEW

Compliance is an integral part of the Wisconsin Charter School Programs (WCSP). The Wisconsin DPI monitors charter schools receiving WCSP subgrants.

The purpose of the visit is to determine how well the subgrantee is meeting requirements and guidelines related to:

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 and fiscal oversight,
4. Performance objectives, and
5. Compliance with state and federal law.

Charter School Leader Name, Phone Number and Email	
Governance Board President Name, Phone Number and Email	
Business Manager Name, Phone Number and Email	
Award Type	
Overall Award Period (7/1/xx - 6/30/xx)	
Total Award Amount	
Current Annual Allocation	

Visit Roster	<i>Provide a list of the individuals who will be attending the visit. Please include name, position, and organization name of all persons attending (school, governing board, sponsor, management company, etc.).</i>
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Visit Components - Times and Locations

Please enter the times for the visit into the table below. All sessions should be scheduled between 8:00 a.m. and 4:30 p.m. No components can be scheduled at the same time, and DPI requests at least 20-minutes between meetings to capture and organize comments from focus groups. If the monitoring team has questions while reviewing documents, the team will reach out to the school leader with those questions during the day of the visit or after the visit. For all in-person sessions, the school should reserve space to host the DPI monitoring team. If any or all of the sessions are virtual, the monitoring team will use this chart to also schedule virtual meetings using Microsoft Teams as needed. The DPI will contact the school at least two weeks prior to the visit to determine which portions of the visit will be in-person sessions and which will be virtual.

Component	Estimated Time Required	Time Scheduled
Orientation by School Administrator/Lead Teacher	15-30 minutes	
Governance Board Focus Group	90 minutes	
Administration and Teacher Focus Group	1 hour	
Community Focus Group	1 hour	
Financial Manager & School Leader Interview (should be conducted on-site over a video call)	1 hour	

Closing Meeting (can include school administrator/lead teacher, financial manager overseeing Indicators 5, 6, 7, and 8, and governance board representation)	15 minutes	
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REVIEWER INSTRUCTIONS FOR THE VISIT MONITORING RUBRIC

During the visit, the review team will be monitoring the school’s progress in several areas, including the following:

- Achieving all required and school-developed grant and education objectives.
- Documentation of all CSP-funded purchases and one-time expenses (including positions funded, lease/rent, and insurance).
- All CSP obligations/purchases must fall within the allowable award period.
- All CSP obligations/purchases are allowable and the school has implemented an inventory control procedure.
- School meeting federal and state definition of charter school and demonstrating autonomy.
- All purchases only benefit students of the charter school receiving CSP grant funds.
- Recruitment, lottery, admission, and retention policies and practices comply with applicable law.
- Minimizing the risk of fraud.

For compliance, all indicators must be fully met. The reviewer may request additional information during or following a visit to gather necessary documentation.

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

The next section shows a blank version of the Charter School Virtual Monitoring Rubric. The remaining pages include all indicators that are used during the scheduled visit.

Indicator: Definition of Indicator		
Documentation: Indicates the documents that are required for each indicator and where the documents should be submitted.		
Sample Questions: Examples of questions that may be asked during the focus groups.		
Indicator Review Criteria	Status	Action Required/Comments

<p>DPI will review questions, documentation, policies, data, and information from focus groups to determine if the indicator has been met.</p>	<p style="text-align: center;">√ Met</p> <p>The school has provided all necessary documentation for this criterion.</p> <p>School complies with ESSA and other related non-regulatory guidance.</p> <p>Policies are in compliance with relevant guidelines in the Uniform Grant Guidance and EDGAR.</p>	
	<p style="text-align: center;">- 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 provide information about the required action and corresponding deadline.</p>
	<p>NA Not applicable</p> <p>The criterion is not applicable.</p>	<p>For criteria marked Not Applicable (NA), no action is required.</p>
<p>Total Criteria:</p>	<p style="text-align: center;"># Met _____</p> <p style="text-align: center;"># Not met _____</p> <p style="text-align: center;"># N/A _____</p>	
<p>Key: √ Met - Not met (Specify action/documentation required) NA Not applicable - Explain</p>		

Indicator 1: Grant Objectives and Parental and Community Involvement

The charter school is on track to meet grant objectives and complete grant activities.

Documentation:

The following documents should be placed into the school's Indicator 1 folder:

- 1. Evaluation of school performance:** *Provide a copy of the most recent evaluation of school performance. This can be a performance evaluation completed by the authorizer or a school-level evaluation. In addition to the authorizer's report, provide any evidence of authorizer monitoring from the grant period.*
- 2. Performance Measures:** *A list of the school's performance measures is available in the school's Performance Measure Review report. Please share information verifying the data that was submitted as part of previous Mid-year and Year-end Reports.*
- 3. Student data including performance, attendance, graduation, and discipline:** *Provide current data on student performance, attendance, graduation, and discipline.*
- 4. General Education Provisions Act (GEPA) Plan:** *A GEPA statement/plan was included in the grant application. Provide an updated statement or plan if this information has changed.*
- 5. Parental and community involvement:** *A description of how parents and community members are involved in the planning or implementation and operation of the charter school was included in the grant application. Provide an updated description if any of this information has changed. Provide evidence that the school has included parents and community members in a manner consistent with the description in the application or the updated description (e.g. parent survey results, meeting minutes, meeting attendance records, letters from parents and community members, etc.).*

Sample Questions - below are some Indicator 1 questions that may be asked of the focus groups:

- Administration/Teacher
 - What are some ways that families can be involved in the school? How do you form strong partnerships with families? What kind of feedback have you received about the level of community involvement?
 - What interventions, supports, and resources does the school provide to meet the academic needs of students who are educationally disadvantaged? Have these been effective? How do you know?
 - In your school, how are you accelerating growth for learners who most need it, based on data, while increasing opportunities and growth for all students?
 - How have you shared best and promising practices with other schools, and how does this align with the plan shared in the grant application?
 - What grant-related accomplishment are you most proud of or excited about?
- Governance Board
 - Describe the progress you have made toward reaching your grant objectives.
 - What grant-related accomplishment are you most proud of or excited about?
 - How have you shared best and promising practices with other schools, and how does this align with the plan shared in the grant application?
 - In your school, how are you accelerating growth for learners who most need it, based on data, while increasing opportunities and growth for all students?
- Community
 - Are there opportunities for you to get involved in the school?

- In what ways has the school tried to strengthen its partnership with you?
- Do you believe your input is valued by the school’s leadership, teachers, and governance board? Why?
- How could the school increase the level of community involvement?

Indicator Review Criteria	Status	Action Required/Comments
1.1 The educational program/grant activities observed matches the grant application description.		
1.2 Objectives articulated in the interview match objectives described in the grant application.		
1.3 The school has met its objectives related to sharing best and promising practices with other charter schools and public schools.		
1.4 If objectives have been modified, are revisions appropriate?		
<p>1.5 The school measures performance and demonstrates improved student achievement based on the school’s Performance Measure Review report and additional submitted data. The data submitted as part of the most recent Mid-year or Year-end Report can be verified.</p> <p>The school has provided annual student achievement data, including but not limited to, attendance, growth,</p>		

<p>attrition, and graduation rates for all students and student subgroups. Evidence provided demonstrates the school is meeting the needs of all students, including educationally disadvantaged students.</p>		
<p>Total Criteria:</p>	<p># Met ____</p> <p># Not met ____</p> <p># N/A ____</p>	
<p>Key: ✓ Met - Not met (Specify action/documentation required) NA Not applicable - Explain</p>		

Indicator 2: Charter School

The grant recipient meets the definition of the term “charter school” in section 4310 of the ESSA.

Documentation:

The following documents should be placed into the school’s Indicator 2 folder:

1. **Board by-laws, non-stock corporation status, articles of incorporation, board policies & procedures:** *DPI has received evidence of the governance board’s non-stock corporation status. Provide any additional evidence of the board’s nonprofit status, 501(c)(3) status, if applicable, a current copy of the board’s by-laws, a copy of the board’s articles of incorporation, and copies of all board policies and procedures.*
2. **Board composition:** *DPI has a list of all current governance board members including their name, title, position and affiliation submitted by the school. Provide an updated list if the composition of the board has changed since the most recent submission of the governance board roster. If the school has a relationship with a management organization, indicate if the governing board is selected by, or includes members who are employees of, the management organization.*
3. **Verification of board training:** *The grant application documents board training that has been/will be provided. Provide evidence of board training.*
4. **Charter schools with Management Organization:** *If the school has a relationship with a management organization, provide a copy of the contract between the school and the management organization, information about any fee paid by the charter school to the management organization, and any other agreements (such as loans and leases) between the school and the management organization.*
5. **Documentation that the school meets the federal definition of a charter school:** *Provide a copy of the school’s policy manual and/or handbook. Other documentation already on file at the DPI and provided*

by the school elsewhere will also be examined to ensure the school meets the federal definition of a charter school.

6. Charter contract and lottery and admission procedures: Provide a copy of the school's lottery and admissions procedures. Other documentation already on file at the DPI and provided by the school elsewhere will also be examined to ensure the school meets the federal and state requirements for lottery and admission.

Sample Questions - below are some Indicator 2 questions that may be asked of the focus groups:

- Administration/Teacher
 - How would you describe the school's mission and academic program to an interested family?
 - Describe the hiring process for a teacher.
 - If subgrantee shares facilities - How have you ensured that only students of the subgrantee school benefit from the grant funds?
- Governance Board
 - How was the school created, and why was it created?
 - How would you describe the school's mission and academic program to an interested family? Has the school's mission or programming changed significantly over time? If so, how?
 - Describe the typical hiring process for a teacher and for a school leader.
 - District-authorized schools - How does the district allocate federal funding for which you are eligible? Which federal funds do you receive?
 - Schools that have a relationship with a management organization that is not the charter holder- Describe your relationship with the management organization. How do you ensure you remain independent from that management organization?
- Community
 - What is your favorite thing about the school? What do you think makes the school special?
 - How would you describe the school's mission and academic program to an interested family?
 - Students - What class or time of day is your favorite? What adult at the school do you connect with the most?

Indicator Review Criteria	Status	Action Required/Comments
2.1. The school has an approved charter contract with its authorizer. Contract Term Dates: _____		

<p>2.2. The school is a nonprofit entity and is a non-stock corporation under Wisconsin law.</p> <p>Date status approved: _____</p> <p>Check if also: __ 501(c)(3)</p>		
<p>2.3. The school application materials clearly state that the charter school is a tuition free public school.</p>		
<p>2.4. The charter school provides a program of elementary or secondary education, or both.</p>		
<p>2.5. The school was created by a developer as a public school.</p>		
<p>2.6. The charter school has a clear lottery policy.</p>		
<p>2.7. The school is receiving the following federal funds: Title I, Part A; Title II, Part A; Title II, Part D; Title III, Part A; Title IV, Part A; Title V, Part A; Title VI, Part B (for eligible LEAs/schools)</p>		
<p>2.8. 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.</p>		

<p>2.9. All items purchased with CSP funds only benefit the students attending the charter school receiving the CSP award.</p> <p><u>Charter schools that share facilities:</u> CSP recipients that share facilities with other schools at the same location demonstrate that only their students benefit from CSP-funded purchases of goods/services.</p>		
<p>2.10. The charter school contract describes how student performance will be measured. It includes information about any additional assessments that are required in addition to the state assessments required of all public school students.</p>		

<p>2.11. The charter school demonstrates through its contract, policies, procedures, and board minutes that it has a high degree of autonomy in governance structure, operations, financial decisions, and staffing decisions.</p> <p><u>Charter schools that are instrumentalities of a district:</u> The hiring process for charter school staff during the grant period demonstrates a high degree of autonomy from the district and aligns with the process described in the grant application and charter contract.</p> <p><u>Charter schools that have a relationship with a management organization:</u> The submitted documentation, interviews, and observations demonstrate that the charter school is independent of the management organization.</p>		
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<p>2.12. The charter school complies with the Age Discrimination Act of 1975, Title VI of the Civil Rights Act of 1964, the Americans with Disabilities Act of 1990, section 444 of GEPA, Title IX of the Education Amendments of 1972, section 504 of the Rehabilitation Act of 1973, and Part B of the IDEA.</p> <p><i>This includes all assurances provided in Public Charter Schools Grant Application.</i></p>		<p>The reviewer will record any questions or concerns that may entail additional follow-up or requests for information.</p>
<p>Total Criteria:</p>	<p># Met _____</p> <p># Not met _____</p> <p># N/A _____</p>	
<p>Key: √ Met – Not met (Specify action/documentation required) NA Not applicable - Explain</p>		

Indicator 3: Lottery, Recruitment, and Retention

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

Documentation:

The following documents should be placed into the school’s Indicator 3 folder:

1. **Admission and lottery provisions:** *The admissions/lottery provisions have already been submitted to DPI. Provide a copy of the school’s admission policy along with a copy of the procedures for conducting the random lottery if any of this information has changed. Also provide the student application and any application information disseminated during the current year.*
2. **Other materials disseminated (registration announcements, application, school pamphlets, and authorizer monitoring documentation):** *Provide a sample of all current year announcements, newsletters, advertisements, public meeting announcements regarding board meetings, parent/community meeting information, informational pamphlets, and any other materials disseminated during the current year related to admissions, application, or general advertisements. Additional materials may be requested by the monitoring team.*
3. **Link to the school’s website:** *Please provide the link to the school’s website. The website must include:*
 - a. *information on the educational program;*
 - b. *student support services;*

- c. *parent contract requirements (as applicable) including any financial obligations or fees, enrollment criteria;*
- d. *annual performance and enrollment data for each of the subgroups of students (i.e. minority, low-income, special ed, ELL, etc.) except in cases where disaggregation of such data would reveal personally identifiable information about an individual students or the number of students within a subgroup is too small to yield statistically reliable information; and*
- e. *Information about the random selection plan utilized if more students apply than there is space available.*

4. Authorizer monitoring documentation: *This should include the most recent annual authorizer report.*

5. Charter contract: *The charter contract is provided in the Indicator 2 folder and does not need to be included in the Indicator 3 folder as well.*

Sample Questions - below are some Indicator 3 questions that may be asked of the focus groups:

- Administration/Teacher
 - What strategies does the school use to recruit, serve, and retain students who are educationally disadvantaged? What strategies do you think have been most effective? How do you know?
 - Which groups of learners have not yet accessed your school, and how are you working to increase access for these groups of learners?
- Governance Board
 - What strategies does the school use to recruit, serve, and retain students who are educationally disadvantaged? How is this monitored by your authorizer?
 - Which groups of learners have not yet accessed your school, and how are you working to increase access for these groups of learners?
 - Did the school utilize its lottery process this past year? Describe the process that was used.
- Community
 - How did you first hear about the school?
 - For students and/or families - What was the application and enrollment process to the school like for your family? Did you find any part of the process difficult? Why did you decide to enroll in the school?

Indicator Review Criteria	Status	Action Required/Comments
3.1. The school is implementing its plan to attract, recruit, admit, enroll, serve, and promote retention of students, including educationally disadvantaged students. The charter school authorizer has monitored this criteria to ensure compliance.		

<p>3.2. 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.</p>		
<p>3.3. The school's random selection process creates a rank order of students which is used to generate an initial waitlist, if applicable.</p>		
<p>3.4. The school's lottery process clearly defines allowable exemptions/preferences.</p>		
<p>3.5. If necessary, the school used a lottery process during the current school year and followed its established guidelines.</p>		
<p>3.6. The charter school has made publicly available, including on the school's website the following information:</p> <ul style="list-style-type: none"> ● Information on the educational program, ● Student support services, ● Parent contract requirements (as applicable) including any financial obligations or fees, ● Enrollment criteria, ● Annual performance and enrollment data for each of the subgroups of students (i.e. minority, low-income, special ed, ELL, etc.) except in cases where disaggregation of 		

such data would reveal personally identifiable information about an individual student or the number of students within a subgroup is too small to yield statistically reliable information.		
3.7. The school does not have any admission requirements that interfere with a fair and open admissions process.		
3.8. The school's website includes information about the random selection plan utilized if more students apply than there is space available.		
Total Criteria:	# Met ____ # Not met ____ # N/A ____	
Key: √ Met - Not met (Specify action/documentation required) NA Not applicable - Explain		

Indicator 4: Monthly Financial Statements to Governing Board and Board Oversight

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

Documentation:

The following documents should be placed into the school's Indicator 4 folder:

1. **Monthly financial statements:** *Provide the monthly financial statements generated for the governing board for the months of March, April, May, and June 2022.*
2. **Board meeting minutes:** *Provide a copy of minutes from board meetings where budgets were discussed and approved.*

Sample Questions - below are some Indicator 4 questions that may be asked of the focus groups:

- Governance Board
 - What is the board's system for reviewing and approving financial statements and the school's budget?

- Describe your level of fiduciary oversight.

Indicator Review Criteria	Status	Action Required/Comments
4.1. School generates monthly financial statements for the governing board.		
4.2. School submits and governing board reviews and approves monthly financial statements (documented in board minutes).		
4.3. Governing board reviews and approves budget and budget amendments (documented in board minutes).		
4.4. 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:	# Met ____ # Not met ____ # N/A ____	

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

Indicator 5: Financial Records

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

Documentation:

The following documents should be placed into the school's Indicator 5 folder:

1. **List of all grant expenditures from the previous school year:** Provide a list of all grant expenditures from the school's accounting system for the 2021-22 school year. A few days prior to the visit, DPI will share a list of the purchases it would like to review receipts or invoices for. Please be prepared to share this documentation as soon as possible after requested by the department and prior to the day of the site visit.
2. **Documentation and records that reflect work performed for salaries and wages paid with CSP funds:** Provide the school's written procedures used to determine that an individual's charges are allowable and properly allocated to the CSP grant. Please have this information available for review during the visit. The written procedures should include:
 - a. Who determines whether an individual is eligible to be claimed on the CSP grant;
 - b. How is it determined that an individual is allowable to be claimed on the CSP grant (e.g. grant requirements, DPI technical assistance, etc.);
 - c. How the distribution of the individual's time is determined;
 - d. How work time is documented by the individual;
 - e. How time worked is recorded into the payroll system;
 - f. How compensation is allocated with the payroll system based on the distribution of the individual's time worked;
 - g. Who prepares claims for the CSP grant;
 - h. What is the process to verify the claim agrees to the actual compensation paid to the individual?
 - i. Who reviews claims;
 - j. Who signs claims; and
 - k. Who files claims with the DPI.

**If you already have written procedures that cover these items or have prepared this information for another grant program or monitoring visit, you may use what you already have. Simply revise the applicable sections so that it is relevant to the CSP.*

3. **Provide sample supporting documentation for one employee paid using CSP funds:** The documentation should include:
 - a. Payroll report for the individual selected from July 1, 2021 to June 30, 2022. The payroll report should include the dates of payroll, compensation amount paid, general ledger account coding, total activity for which the employee is compensated and documentation supporting the actual hours worked and how the compensation is allocated for any individual whose compensation is allocated among more than one activity or cost objective or more than one federal or federal and non-federal award. If all of these items are not included in the payroll report, attach additional documentation as necessary.

Sample Questions: This indicator will be addressed during the interview with the financial manager. There may be questions related to any expenditures reviewed. The financial manager should be on-site and may be asked to provide evidence for some of these criteria through the video call.

Indicator Review Criteria	Status	Action Required/Comments
5.1. School has a clearly organized system for maintaining receipts/invoices for all purchases made with CSP Funds.		

<p>5.2. Reviewer will randomly select and review at least 40% of receipts/invoices from the previous school year. Clearly identifiable receipts can be matched to the approved CSP budget for any items selected by the reviewer. All items/services purchased with CSP funds are allowable.</p> <p>If the school received additional funding for serving secondary students, the school has appropriately utilized the Program Type of Charter Schools Secondary within WISEgrants to indicate which costs were associated with secondary students, as applicable.</p>		
<p>5.3. School stores receipts and financial records in a manner that minimizes possibility of destruction (locked, fireproof storage, regular off-site backups of electronic records).</p>		
<p>5.4. The written procedure used to determine salaries and wages paid by the CSP grant includes all applicable components and is sufficient to determine allowable charges for salaries and wages.</p>		

<p>5.5. The sample documentation provided includes all required components and is sufficient to determine that salaries and wages paid using CSP funds are properly recorded and tracked in the payroll system.</p>		
<p>Total Criteria:</p>	<p># Met _____</p> <p># Not met _____</p> <p># N/A _____</p>	
<p>Key: √ Met - Not met (Specify action/documentation required) NA Not applicable - Explain</p>		

Indicator 6: Policies and Written Procedures

The charter school has sufficient procedures in place to ensure Federal funds are spent appropriately in order to comply with Federal requirements. The charter school segregates among staff or directors various financial duties to minimize the risk of fraud or misuse of funds.

Documentation:

The following documents should be placed into the school’s Indicator 6 folder:

1. **Approved charter school policies:** *Provide the charter school policies the governance board has approved, and evidence that the governance board has approved the policies. **Accounting manual:** Provide the school’s accounting manual. Provide any other financial related policies covering cash, purchases, deposits, segregation of duties, etc.*
2. **P-Card policies:** *Provide the school’s P-card policies if not included in the school’s accounting manual.*
3. **Written procedures for cash management:** *Provide the school’s written procedures for cash management of Federal funds.*
4. **Written procedures for allowable costs:** *Provide the school’s written procedures for allowable costs for purchases made with Federal funds.*
5. **Written procedures for procurement and conflict of interest:** *Provide the school’s written procedures for procurement and conflict of interest. The policy must include written standards of conduct covering conflicts of interest and governing the actions of employees, officers or agents engaged in the selection, award, and administration of contracts. No employee, officer, or agent may 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 procurement policy must also include written standards of conduct covering organizational conflicts of interest. Organizational conflicts of interest means that because of relationships*

with a parent company, affiliate, or subsidiary organization, the entity is unable or appears to be unable to be impartial in conducting a procurement action involving a related organization.

Sample Questions: While this indicator will not be directly addressed during the focus groups, the governance board will be asked to provide information about how their board's policies and how they are utilized.

Indicator Review Criteria	Status	Action Required/Comments
6.1. The school's governance board has approved and utilizes the policies used by the charter school.		
6.2. Approved policies specify segregation of financial duties by position/person responsible or the school has compensating controls in place if duties are not segregated.		
6.3. Access to P-cards guidelines and allowable uses are included in the school's financial policies.		
6.4 The charter school has approved written procedures regarding the allowability of costs to be charged to the WCSP and cash management procedures for Federal funds.		
6.5 Does the school have a procurement policy, including sufficient statements covering conflicts of interest and are those statements on file and accessible by the governance board president?		
Total Criteria:	# Met ____ # Not met ____ # N/A ____	
Key: ✓ Met - Not met (Specify action/documentation required) NA Not applicable - Explain		

Indicator 7: Financial and Programmatic Audit

The charter school complies with the same federal and state audit requirements as do other elementary and secondary schools in the state and has an annual independent audit of its financial statements prepared in accordance with generally accepted accounting principles, reviewed by the school's authorizer, and publicly recorded.

Documentation:

The following documents should be placed into the school's Indicator 7 folder:

1. **Annual independent financial audit:** *Provide a copy of the school's most recent independent audit and a link to the webpage where the audit is publicly available.*
2. **Charter contract:** *The charter contract is provided in the Indicator 2 folder and does not need to be included in the Indicator 7 folder as well.*

Sample Questions: This indicator will not be directly addressed during the focus groups.

Indicator Review Criteria	Status	Action Required/Comments
7.1. The school has an annual independent financial audit. The school's most recent audit as a subgrantee was submitted to DPI and the school's authorizer.		
7.2. The charter contract requires a financial and programmatic audit.		
7.3. When was the most recent independent annual audit completed? Date completed: _____		
7.4. The audit is publicly recorded on the school's website.		
Total Criteria:	# Met ____ # Not met ____ # N/A ____	

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

Indicator 8: Equipment

The charter school has implemented an inventory control procedure that ensures equipment purchased with CSP funds are identified, marked, and accounted for on a regular basis. Please note that “equipment” referred to in this section 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.” The school is in compliance with Federal depreciation guidelines.

Documentation:

The following documents should be placed into the school’s Indicator 8 folder:

- 1. Provide the procedures for managing equipment in-whole or in-part with federal funds and capitalization policy. Provide the written procedures for equipment management including:**
 - a. *Capitalization policy;*
 - b. *Detailed property records that include:*
 - i. *Description of the property;*
 - ii. *Serial number or other ID number;*
 - iii. *Source of funding, including the Federal Award Identification Number (property acquired with CSP funds should be identified);*
 - iv. *Who holds title;*
 - v. *Acquisition date;*
 - vi. *Cost of the property and percentage of federal funds used to acquire the property;*
 - vii. *Location of the property;*
 - viii. *Use and condition of the property; and*
 - ix. *Any disposition data including date of disposal and sale price of the property.*
 - c. *Most recent physical inventory (must be completed at least once every two years) of the property including:*
 - i. *Documentation that the results were reconciled with property records;*
 - ii. *Description of how the inventory was completed;*
 - iii. *Date of the inventory and date of most recent prior inventory;*
 - iv. *Description of procedures to prevent and investigate loss, damage or theft;*
 - v. *Description of maintenance procedures to ensure property is kept in good condition;*
 - vi. *Description of policy when selling property that has been purchased with CSP funds; and*
 - vii. *Policies for disposition of supplies or equipment purchased with federal funds.*
- *If you have already prepared this information for another grant program or monitoring visit, you may use what you already have. **You are not required to prepare the property records or inventory again. Be sure the property records and inventory clearly note what items were paid for with CSP funds.***
- 2. Inventory:** *Provide documentation of the most recent inventory completed by the school for all equipment.*
 - 3. Property records:** *Provide the school’s property records for all equipment.*

- 4. Depreciation schedule and depreciation policies:** *Provide the school's depreciation schedule and depreciation policies for any equipment purchased with CSP funds. The school's charges for depreciation must be supported by adequate property records and physical inventories that have been taken at least once every two years to ensure that the assets exist and are usable, used, and needed. The depreciation schedule and/or depreciation policies for equipment purchased with Federal funds should be in accordance with the following requirements:*
- a. *Any allocation for depreciation has been made in accordance with Appendices III through IX of the Uniform Grant Guidance;*
 - b. *The computation for depreciation has been based on the acquisition cost of the assets involved. For an asset donated to the school by a third party, its fair market value at the time of the donation must be considered as the acquisition cost;*
 - c. *Assets have not been both depreciated and claimed as matching;*
 - d. *The computation for depreciation does not include any of the following:*
 - i. *Cost of land;*
 - ii. *Any portion of the cost of buildings and equipment born by or donated by the Federal Government (irrespective of where title was originally vested or where it is presently located);*
 - iii. *Any portion of the cost of buildings and equipment contributed by or for the school that are already claimed as matching or where law or agreement prohibits recovery; and*
 - iv. *Any asset acquired solely for the performance of a non-Federal award.*
 - e. *The useful life has been established for usable capital assets that has taken into consideration all of the following:*
 - i. *Type of construction;*
 - ii. *Nature of the equipment;*
 - iii. *Technological developments;*
 - iv. *Historical Data; and*
 - v. *Renewal and Replacement policies for the classes of assets involved.*
 - f. *The depreciation method used to charge the cost of an asset reflects the use of the asset during its useful life;*
 - g. *The school's policies indicate the use of the straight-line method for depreciation unless the school has clear evidence indicating that the expected consumption of the asset will be significantly greater in the early portions than in later portions of the asset's useful life;*
 - h. *The depreciation method has not been changed unless approved by the department;*
 - i. *Any depreciation calculated for indirect rate purposes, has used the same depreciation methods used by the school for its financial statements;*
 - j. *Depreciation for a building has been depreciated as a single asset and depreciated over a single useful life, or depreciated as multiple components and depreciated over the component's estimated useful life. If the school has grouped the building into multiple components, the school has grouped the building components into the following general components as follows:*
 - i. *Building shell (construction and design costs);*
 - ii. *Building services systems (elevators, HVAC, plumbing, heating, and air conditioning); and*
 - iii. *Fixed equipment (sterilizers, casework, fume hoods, cold rooms, and glassware/washers).*

- k. *If the school has depreciated a building using more than the groupings identified in j above, these groupings have been approved by the department;*
- l. *If the school has depreciated a building using groupings as identified in j or k above, the depreciation for the building is consistent for indirect rate purposes and financial statement purposes;*
- m. *No depreciation has been charged on assets that have outlived their depreciable lives; and*
- n. *If the school has used the depreciation method to replace the use allowance method, depreciation has been computed as if the asset had been depreciated from the date the asset was acquired and ready for use to the date of disposal. The total amount of use allowable and depreciation for an asset does not exceed the total cost of the asset.*

5. Title(s): *If the school has purchased any vehicles or other equipment that is titled with CSP funds, please provide the title.*

Sample Questions: This indicator will be addressed during the interview with the financial manager. There may be questions related to any equipment reviewed. The financial manager should be on-site and will be asked to provide evidence for some of these criteria through the video call.

Indicator Review Criteria	Status	Action Required/Comments
8.1. Does the school have an inventory control system for equipment?		
8.2. How often does the policy require a full inventory of equipment? This policy must require a full inventory at least once every two years. Most recent inventory date: _____		
8.3. Was the most recent inventory reconciled to the property records? Were any items of concern properly investigated?		
8.4. All equipment purchased with CSP funds is clearly identified and included in the inventory report and property records.		

<p>8.5. Do the property records include a description of the property, a serial number of other ID number, the source of funding including the FAIN, title, acquisition date, cost of property, percentage of property purchased with federal funds, location, use, and condition of property, disposition date (if applicable), and sale price of property (if applicable) for all equipment purchased with CSP funds?</p>		
<p>8.6. How does inventory system account for lost, stolen, or damaged items?</p>		
<p>8.7. Is there a capitalization policy with an established capitalization threshold?</p>		
<p>8.8. Is equipment purchased with CSP funds identified with unique code?</p>		
<p>8.9. Do any school loans use equipment purchased by CSP as collateral? Please note that this is <u>not allowable</u>.</p>		
<p>8.10. Do the property records and most recent inventory report show the final disposition date, reason, and how CSP funded items were removed from inventory?</p>		
<p>8.11. Policy on the sale of property purchased with federal funds is included. If any property purchased with CSP funds was sold, the procedure was followed.</p>		

8.12. The school's charges for depreciation are supported by adequate property records.		
8.13. The school's charges for depreciation are supported by physical inventories that have been taken at least once every two years to ensure that the assets exist and are usable, used, and needed.		
8.14 The school has adequate depreciation records showing the amount of depreciation.		
8.15. Does the landlord or school district have the right to confiscate equipment purchased with CSP funds? Please note that this is <u>not allowable</u> .		
8.16 If the school has purchased any vehicle or other equipment that is titled with CSP funds, is the equipment titled to the charter school governance board?		
Total Criteria:	# Met ____ # Not met ____ # N/A ____	
Key: √ Met – Not met (Specify action/documentation required) NA Not applicable - Explain		

Additional Visit Comments
