

Urban Pathways K-5 College Charter School

Board of Trustees Policy

BANK ACCOUNTS POLICY

The Board of Trustees ("Board") of the Urban Pathways K-5 College Charter School ("Charter School") shall designate one or more bank(s) and trust companies as depository(s) for the safeguarding of school funds by a majority vote of the Board in accordance with the Bylaws.

Each designated depository shall be federally secured and insured by the FDIC and such deposits shall be so secured and insured in accordance with law.

Each designated depository shall be advised not to cash checks payable to Urban Pathways K-5 College Charter School but to deposit said checks to Charter School's accounts.

The Business Manager or designee shall review the monthly bank statements and report to the CEO on effectiveness and recommended improvements, and prepare administrative regulations and procedures for sound banking operations.

TO THE EXTENT THAT ANYTHING IN THIS POLICY COULD BE CONSTRUED TO CONFLICT WITH THE SCHOOL'S CHARTER OR APPLICABLE STATE AND/OR FEDERAL LAWS, THE APPLICABLE STATE AND/OR FEDERAL LAWS AND/OR CHARTER CONTROL.

ADOPTED this day _____ of _____, 2023

President

Secretary

Urban Pathways K-5 College Charter School

Board of Trustees Policy

BUDGET PLANNING, PREPARATION, AND MONITORING POLICY

The Board of Trustees (the “Board”) of Urban Pathways K-5 College Charter School (“Charter School”) considers the preparation of an annual budget to be one of its most important responsibilities because the budget is the financial reflection of the education plan for Charter School. The budget shall be designed to carry out that plan in a thorough and efficient manner and to maintain the facilities and honor the obligations of Charter School.

The budget should be studied by each member of the Board during its preparation but, once adopted, it deserves the support of all members of the Board regardless of their position when adoption was voted

The budget shall be designed to reflect the Charter School’s objectives for the education of the students. Therefore, it must be organized and planned to ensure adequate understanding of the financial needs associated with program implementation, support, and development. This necessitates a continuous joint review of the financial requirements of Charter School programs by the Charter School Administration and Board of Trustees.

It is the policy of the Board to establish a system of control over the adopted budget to assure that funds are available for approved programs and that Charter School remains financially sound.

No expenditure may exceed the adopted budget line for fund, function and class.

The CEO or designee shall ascertain that funds are available in the appropriate budget line item prior to the release of any purchase order or commitment. No funds shall be released unless funds are available in the appropriate budget line item.

To meet the objectives of this policy, the Board directs the CEO or designee to set general priorities for expenditures for:

1. Staff necessary to maintain current programs and an estimated annual cost for additional staff to implement, improve or expand current educational program and support services.
2. Preparing a long range plan for annual maintenance and replacement of facilities.
3. Technology, equipment and supplies necessary to maintain current programs and prepare a plan for future new technology needs, debt service, equipment and supplies necessary to improve or expand current programs.
4. Maintaining an inventory and replacement schedule of all Charter School equipment.
5. Establishing a projected budget of expenditures and income for the current year and ensuing year and projecting an amount of surplus anticipated at the end of the current fiscal year.
6. Student enrollment in current programs and estimated student enrollment in special education and other instructional programs for the upcoming school year.
7. Estimated revenue and expenditures in each financial category for the previous fiscal year and a plan of anticipated revenues based on changes in state and federal legislation.
8. Explanation of each item of expense proposed, upon request.
9. Report of any serious financial implications arising from the budget plan.

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Urban Pathways K-5 College Charter School

Board of Trustees Policy

COMMON TRUSTS FOR GIFTS & GRANTS POLICY

The Board of Trustees (the “Board”) of the Urban Pathways K-5 College Charter School (“Charter School”) recognizes the need to establish a mechanism for the acceptance and use of gifts, bequests, or grants made to the Charter School.

The Board accepts with gratitude bequests for the advancement of education or for the general welfare of its students and staff.

All bequests shall be accepted by a resolution of the Board setting forth the identity of the grantor (unless the grantor requests anonymity), the stipulated use of the bequest, the time period over which the bequest is to be expended and limitations, if any, which apply to the use of funds.

The Chief Executive Officer (“CEO”) or his/her designee shall see to the investment of all trust funds received with the term of the investment consistent with the period of the intended use of the funds and the purpose of the Charter School.

The CEO, in consultation with key staff, shall determine the most appropriate use of trust funds consistent with the intent of the grantor and the purpose of Charter School. Recommended uses shall be submitted by resolution for approval of the Board.

No bequest or grant of funds shall be accepted if conditions associated with the grant would be antithetical to the mission of the Charter School.

No bequest or grant of funds shall be accepted for any purpose inconsistent with the ideals of a free and democratic society.

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Urban Pathways K-5 College Charter School

Board of Trustees Policy

CREDIT CARD/DEBIT CARD POLICY

The Board of Trustees (“Board”) of the Urban Pathways K-5 College Charter School (“Charter School”) recognizes the value of an efficient method of payment and recordkeeping for certain expenses. The Board, therefore, authorizes the use of credit cards and debit cards (referred to collectively as “Credit Cards”). The authorization, handling, and use of credit cards have been established to provide a convenient and efficient means to purchase goods and services from vendors.

Although the cards are issued in the Charter School’s employee’s name, they are considered School property and should be used with good judgment.

Credit cards shall not be used in order to circumvent the general purchasing procedures established by Pennsylvania State law and Board policy. The Board affirms that credit cards shall only be used in connection with Board-approved or school-related activities and that only those types of expenses that are for the benefit of the Charter School and serve a valid and proper purpose shall be paid for by credit card.

Under no circumstances shall credit cards be used for personal purchases. The credit card is for business related purchases only and personal charges are not to be made to the card. Purchases are limited to meals, refreshments, travel, small supplies, and other Charter School -related items.

The cardholder is the only person entitled to use the card and is responsible for all charges made against the card. Improper use of the card can be considered a misappropriation of Charter School funds. Inappropriate or illegal use of the credit card may result in a loss of credit card privileges, disciplinary action, up to and including termination, personal responsibility for any and all inappropriate charges, including finance charges and interest assessed in connection with the purchase, and/or possible referral to law enforcement authorities for prosecution.

All charges are billed directly to and paid directly by the Charter School. Therefore, any personal charges on the credit card could be considered misappropriation of Charter School funds since the cardholder cannot pay the bank directly.

Credit cardholders are expected to comply with internal control procedures in order to protect Charter School assets. This includes keeping receipts, coding transaction to the

appropriate general ledger code, reviewing the transaction for propriety, reconciling monthly statements and following proper card security measures. Cardholders are responsible for reconciling their monthly statement and resolving any discrepancies by contacting the supplier first and then the bank.

The Chief Executive Officer or his/her designee shall annually submit for Board approval the position titles authorized to use Charter School credit card(s) in conducting school business.

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Urban Pathways K-5 College Charter School

Board of Trustees Policy

FEDERAL FISCAL COMPLIANCE POLICY

The Board of Trustees (the “Board”) of Urban Pathways K-5 College Charter School (“Charter School”) shall ensure federal funds received by the Charter School are administered in accordance with federal requirements, including but not limited to the federal Uniform Grant Guidance.

The Board shall review and approve all applications for federal funds submitted by the Charter School.

The Board designates the Business Manager as the Charter School contact for all federal programs and funding.

The CEO or his/her designee, in collaboration with the Federal Programs Coordinator and Business Manager, shall establish and maintain a sound financial management system to include internal controls and federal grant management standards covering the receipt of both direct and state-administered federal grants, and to track costs and expenditures of funds associated with grant awards.

The Charter School’s financial management system shall be designed with strong internal controls, a high level of transparency and accountability, and documented procedures to ensure that all financial management system requirements are met. Financial management standards and procedures shall assure that the following responsibilities are fulfilled:

Identification – the Charter School must identify, in its accounts, all federal awards received and expended, and the federal programs under which they were received.

Financial Reporting – Accurate, current, and complete disclosure of the financial results of each federal award or program must be made in accordance with the financial reporting requirements of the Education Department General Administrative Regulations (“EDGAR”).

Accounting Records – the Charter School must maintain records which adequately identify the source and application of funds provided for federally-assisted activities.

Internal Controls – Effective control and accountability must be maintained for all funds, real and personal property and other assets. The Charter School must adequately safeguard all such property and must assure that it is used solely for authorized purposes.

Budget Control – Actual expenditures or outlays must be compared with budgeted amounts for each federal award. Procedures shall be developed to establish determination for allowability of costs for federal funds.

Cash Management – The Charter School shall maintain written procedures to implement the cash management requirements found in EDGAR. See Attachment.

Allowability of Costs – The Charter School shall ensure that allowability of all costs charged to each federal award is accurately determined and documented. See Attachments.

Procurement – The Charter School has outlined cost thresholds for determining when the quote or formal bidding procedures that are required by state law as reflected in the Purchases Subject to Bid Policy must be modified when making purchases for federally funded purposes to which the Uniform Grant Guidance or USDA regulations apply. See Attachment.

Standards of Conduct

The Charter School shall maintain standards of conduct covering conflicts of interest and the actions of employees and school officials engaged in the selection, award and administration of contracts.

All employees shall be informed of conduct that is required for federal fiscal compliance and the disciplinary actions that may be applied for violation of Board policies, administrative regulations, rules and procedures.

Employees - Time and Effort Reporting

All Charter School employees paid with federal funds shall document the time they expend in work performed in support of each federal program, in accordance with law. These time-and-effort reporting requirements do not apply to contracted individuals.

The Charter School's CEO or his/her designee will ensure that supporting documentation for this time-and-effort will be maintained for Charter School employees

with wages and/or benefits that are related to any combination of a federal award, cost objectives and/or other federal, state or local funding sources. Supporting documentation for Charter School employee time and effort must be sufficient so that costs were correct and appropriately allotted.

All employees paid with federal funds, including any employee whose salary is paid with state or local funds and is used to meet a required "match" in a federal program, must submit either (1) a semi-annual certification or (2) a personnel activity report, as specified below. The type of form depends on the number of programs or cost objectives that an employee works on over the course of a school year. A cost objective is a program, function, activity, award, organizational subdivision, contract, or work unit of which cost data are described and from which provision is made to accumulate and measure the cost of processes, products, jobs, or capital projects. *See* 2 C.F.R. § 200.28.

All employees who work on a single program or cost objective must complete a semi-annual certification. The semi-annual certification must be: (1) completed at least every six months; (2) be signed by the employee or the supervisor with direct knowledge of the work being performed; (3) reflect an after-the-fact (as distinguished from budgeted) distribution of the actual activity; and (4) account for the total activity for which each employee is compensated.

All employees who work on multiple programs or cost objectives must complete a personnel activity report (*see* 2 C.F.R. § 200.430) that support the distribution of their salaries or wages that meet the following standards: (1) reflect an after-the-fact (as distinguished from budgeted) distribution of the actual activity; (2) account for the total activity for which each employee is compensated; (3) are prepared semi-annually; and (4) are signed by the employee.

Payroll charges shall match the actual distribution of time recorded on the certification documents. The certifications shall be collected from employees semi-annually and reviewed by each employee's supervisor. If an employee exits the federally-funded program mid-year, the employee's supervisor is responsible for collecting outstanding certifications even though the employee is no longer employed in that role.

Documentation of this will be stored by the Charter School for the required time period (see below for retention procedures).

Charter School employees shall be reimbursed for travel costs incurred in the course of performing services related to official business as a federal grant recipient.

The Charter School shall establish and maintain employee policies on hiring, benefits and leave and outside activities, as approved by the Board.

Record Keeping

The Charter School shall maintain a Records Management Plan and related Board policy and administrative regulations for the retention, retrieval and disposition of manual and electronic records, including emails.

The Charter School shall ensure the proper maintenance of federal fiscal records documenting:

- a. Amount of federal funds.
- b. How funds are used.
- c. Total cost of each project.
- d. Share of total cost of each project provided from other sources.
- e. Other records to facilitate an effective audit.
- f. Other records to show compliance with federal program requirements.
- g. Significant project experiences and results.
- h. All records must be retrievable and available for programmatic or financial audit.

The Charter School shall provide the federal awarding agency, Inspectors General, the Comptroller General of the United States, and the pass-through entity, or any of their authorized representatives, the right of access to any documents, papers, or other Charter School records which are pertinent to the federal award. The Charter School shall also permit timely and reasonable access to the Charter School's personnel for the purpose of interview and discussion related to such documents.

Records shall be retained for a minimum of five (5) years from the date on which the final Financial Status Report is submitted, or as otherwise specified in the requirements of the federal award, unless a written extension is provided by the awarding agency,

cognizant agency for audit, oversight agency for audit or cognizant agency for indirect costs.

If any litigation, claim or audit is started before the expiration of the standard record retention period, the records shall be retained until all litigation, claims or audits have been resolved and final action taken.

As part of the Records Management Plan, the Charter School shall maintain a records retention schedule, which shall delineate the record retention format, retention period and method of disposal.

The Records Management Plan shall include identification of staff authorized to access records, appropriate training, and preservation measures to protect the integrity of records and data.

The Charter School shall ensure that all personally identifiable data protected by law or regulations is handled in accordance with the requirements of applicable law, regulations, Board policy and administrative regulations.

Subrecipient Monitoring

In the event that the Charter School awards subgrants, the Charter School shall establish procedures to:

- a. Assess the risk of noncompliance.
- b. Monitor grant subrecipients to ensure compliance with federal, state, and local laws and Board policy and procedures.
- c. Ensure the Charter School's record retention schedule addresses document retention on assessment and monitoring.

Compliance Violations

Employees and contractors involved in federally funded programs and subrecipients shall be made aware that failure to comply with federal law, regulations or terms and conditions of a federal award may result in the federal awarding agency or pass-through entity imposing additional conditions or terminating the award in whole or in part.

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President

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Cash Management - Federal Programs

The Charter School receives payment from the Pennsylvania Department of Education (PDE) on a reimbursement basis. The Charter School may receive an advance of federal grant funds. The Charter School shall maintain accounting methods and internal controls and procedures that assure those responsibilities are met.

Payment Methods

Reimbursements -

The Charter School will initially charge federal grant expenditures to nonfederal funds. The Business Manager will request reimbursement for actual expenditures incurred under the federal grants monthly.

Such requests shall be submitted with appropriate documentation and signed by the requestor. Requests for reimbursements will be approved by the Business Manager. Reimbursement will be submitted on the appropriate form to the PDE portal. All reimbursements are based on actual disbursements, not on obligations. PDE will process reimbursement requests within the timeframes required for disbursement. Consistent with state and federal requirements, the Charter School will maintain source documentation supporting the federal expenditures (invoices, time sheets, payroll stubs, etc.) and will make such documentation available for PDE to review upon request. Reimbursements of actual expenditures do not involve interest calculations.

Advances -

When the Charter School receives advance payments of federal grant funds, it must minimize the time elapsing between the transfer of funds to the Charter School and the expenditure of those funds on allowable costs of the applicable federal program. (2 CFR Sec. 200.305(b)) The Charter School shall attempt to expend all advances of federal funds within seventy-two (72) hours of receipt.

When applicable, the Charter School shall use existing resources available within a program before requesting additional advances. Such resources include program income (including repayments to a revolving fund), rebates, refunds, contract settlements, audit recoveries, and interest earned on such funds. (2 CFR Sec. 305(b)(5)) The Charter School shall hold federal advance payments in insured, interest-bearing accounts.

The Charter School is permitted to retain for administrative expense up to \$500 per year of interest earned on federal grant cash balances. Regardless of the federal awarding agency, interest earnings exceeding \$500 per year shall be remitted annually to the Department of Health and Human Services Payment Management System (PMS)

through an electronic medium using either Automated Clearing House (ACH) network or a Fedwire Funds Service payment. (2 CFR Sec. 200.305(b)(9))

Consistent with state guidelines, interest accruing on total federal grant cash balances shall be calculated on cash balances per grant and applying the actual or average interest rate earned. Remittance of interest shall be responsibility of the Business Manager.

Allowability of Costs – Federal Programs

Expenditures must be aligned with approved budgeted items. Any changes or variations from the state-approved budget and grant application need prior approval from the state.

Delegation of Responsibility

When determining how the Charter School will spend its grant funds, the Business Manager 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 good or service.

Allowability Determinations

All costs supported by federal education funds must meet the standards outlined in Education Department General Administrative Regulations (“EDGAR”), 2 CFR Part 3474 and 2 CFR Part 200, Subpart E. The Business Manager must consider these factors when making an allowability determination.

Part 200 sets forth general cost guidelines that must be considered, as well as rules for specific types of items, both of which must be considered when determining whether a cost is an allowable expenditure of federal funds. The expenditure must also be allowable under the applicable program statute (e.g., Title I of the Elementary and Secondary Education Act (ESEA), or the Carl D. Perkins Career and Technical Education Act (Perkins)), along with accompanying program regulations, nonregulatory guidance and grant award notifications.

Restrictions in state and local rules or policy also must be considered. Whichever allowability requirements are stricter will govern whether a cost is allowable.

General allowability determination factors include the following:

1. Be Necessary and Reasonable for the performance of the federal award. 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 to incur the cost was made. For example, reasonable means that sound business practices were followed, and purchases were comparable to market prices.

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

- Whether the cost is a type generally recognized as ordinary and necessary for the operation of the Charter School or the proper and efficient performance of the federal award.
- The restraints or requirements imposed by factors, such as: sound business practices; arm's-length bargaining; federal, state 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 individual incurring the cost acted with prudence in the circumstances considering responsibilities to the Charter School, its employees, its students, the public at large, and the federal government.
- Whether the Charter School significantly deviates from its established practices and policies regarding the incurrence of costs, which may unjustifiably increase the federal award's cost. (2 CFR Sec. 200.404)

Whether a cost is **necessary** will be determined based on the needs of the program. Specifically, the expenditure must be necessary to achieve an important program objective. A key aspect in determining whether a cost is necessary is whether the Charter School can demonstrate that the cost addresses an existing need, and can prove it.

When determining whether a cost is necessary, consideration may be given to:

- Whether the cost is needed for the proper and efficient performance of the federal award 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.
- Whether the cost addresses program goals and objectives and is based on program data.

2. Allocable to the federal award. A cost is allocable to the federal award if the goods or services involved are chargeable or assignable to the federal award in accordance with the relative benefit received. This means that the federal grant program derived a benefit in proportion to the funds charged to the program. (2 CFR Sec. 200.405)
3. Consistent with policies and procedures that apply uniformly to both federally-financed and other activities of the school entity.
4. Conform to any limitations or exclusions set forth as cost principles in Part 200 or in the terms and conditions of the federal award.
5. Consistent treatment. A cost cannot be assigned to a federal award as a direct cost if any other cost incurred for the same purpose in like circumstances has been assigned as an indirect cost under another award.
6. Adequately documented. All expenditures must be properly documented.
7. Be calculated in accordance with generally accepted accounting principles (GAAP), unless provided otherwise in Part 200.
8. Not included as a match or cost-share, unless the specific federal program authorizes federal costs to be treated as such. Some federal program statutes require the nonfederal entity to contribute a certain amount of nonfederal resources to be eligible for the federal program.
9. Be the net of all applicable credits. The term “applicable credits” refers to those receipts or reduction of expenditures that operate to offset or reduce expense items allocable to the federal award. Typical examples of such transactions are: purchase discounts; rebates or allowances; recoveries or indemnities on losses; and adjustments of overpayments or erroneous charges. To the extent that such credits accruing to or received by the state relate to the federal award, they shall be credited to the federal award, either as a cost reduction or a cash refund, as appropriate. (2 CFR Sec. 200.406)

Selected Items of Cost

Charter School personnel responsible for spending federal grant funds and for determining allowability must be familiar with and refer to the Part 200 selected items of cost section. These rules must be followed when charging these specific expenditures to a federal grant. When applicable, employees must check costs against the selected items of cost requirements to ensure the cost is allowable, and also check state, Charter School and program-specific rules.

Any questions related to specific costs should be forwarded to the Business Manager who shall consult with the school solicitor for clarification as appropriate.

Administration of Federal Funds – Type of Costs, Obligations and Property Management

The Charter School establishes and maintains Board policies, administrative regulations and procedures on administration of federal funds in federal programs as required by the Uniform Grant Guidance and other federal, state and local laws, regulations and requirements. The Charter School’s financial management system includes internal controls and grant management standards in the following areas.

Direct and Indirect Costs

Direct costs – costs that can be identified specifically with a particular final cost objective, such as a federal award, or other internally or externally funded activity, or that can be directly assigned to such activities relatively easily with a high degree of accuracy.

Indirect costs – costs incurred for a common or joint purpose benefiting more than one (1) cost objective, and not readily assignable to the cost objectives specifically benefitted, without effort disproportionate to the results achieved.

Costs incurred for the same purpose in like circumstances must be treated consistently as either direct or indirect costs. (2 CFR Sec. 200.405, 200.413)

Identification with the federal award rather than the nature of the goods and services involved is the determining factor in distinguishing direct from indirect costs.

Direct and indirect costs shall be determined in accordance with law, regulations, the terms and conditions of the federal award, and the Charter School’s negotiated indirect cost rate.

The Charter School shall develop an indirect cost rate proposal and cost allocation plan in accordance with law, regulations and the terms and conditions of the federal award.

Timely Obligation of Funds

Obligations – orders placed for property and services, contracts and subawards made, and similar transactions during a given period that require payment by the Charter School during the same or a future period.

All obligations must occur between the beginning and ending dates of the federal award project, which is known as the period of performance. The period of performance is dictated by law and regulations and will be indicated in the federal award. Specific requirements for carryover funds may be specified in the federal award and must be adhered to by the Charter School. (2 CFR Sec. 200.77, 200.309)

The Charter School will handle obligations and carry over of state-administered and direct grants in accordance with state and federal law and regulations, and the terms and conditions of the federal award. Carryover will be calculated and documented by the Business Manager.

The Charter School may exercise an extension of the period of performance under a direct grant in accordance with law, regulations and the terms and conditions of the federal award when written notice is provided to the federal awarding agency at least ten (10) calendar days prior to the end of the period of performance. (2 CFR Sec. 200.308(d)(2))

The CEO along with the Business Manager will decide when an extension of the period of performance is necessary and will recommend that the Board approve this process.

The CEO along with the Business Manager will develop the required written notice, including the reasons for the extension and revised period of performance; the notice will be issued no later than ten (10) calendar days prior to the end of the currently documented period of performance in the federal award.

The Charter School must seek approval from the federal awarding agency for an extension of the period of performance when the extension is not contrary to federal law or regulations, and the following conditions apply:

- a. The terms and conditions of the federal award prohibit the extension;
- b. The extension requires additional federal funds; or
- c. The extension involves any change in the approved objectives or scope of the project. (2 CFR Sec. §200.308)

The CEO along with the Business Manager will determine when an extension must be requested for approval by the federal awarding agency, draft the written request and notify the Board of the requested extension.

Management of Property Acquired With Federal Funds

Contract and Purchasing Administration -

The Charter School maintains internal controls, administrative regulations and procedures to ensure that contractors deliver goods and services in accordance with the terms, conditions and specifications of the designated contract, purchase order or requisition.

Property Classifications -

Property shall be classified as equipment, supplies, computing devices and capital assets as defined and specified in accordance with law, regulations and Board policy.

Inventory Control/Management -

All property purchased with federal funds, regardless of cost, will be inventoried as a safeguard.

Inventory will be received by the department or program requesting the item; designated staff will inspect the property, compare it to the applicable purchase order or requisition, and ensure it is appropriately logged and tagged in the Charter School's property management system.

Items acquired will be physically labeled by source of funding and acquisition date.

Inventory records of equipment and computing devices must be current and available for review and audit, and include the following information:

- a. Description of the item, including any manufacturer's model number.
- b. Manufacturer's serial number or other identification number.
- c. Identification of funding source.
- d. Acquisition date and unit cost.
- e. Source of items, such as company name.
- f. Percentage of federal funds used in the purchase.
- g. Present location, use, condition of item, and date information was reported.
- h. Pertinent information on the ultimate transfer, replacement or disposition of the item and sale price of the property.

Inventory will be updated as items are sold, lost or stolen, or cannot be repaired, and new items are purchased.

Physical Inventory -

Physical inventory of property will be completed by designated Charter School staff in accordance with applicable federal and state law and regulation and Board policy.

The physical inventory of items will be conducted annually, and the results will be reconciled with the inventory records and reported to the federal awarding agency.

Maintenance -

The Charter School establishes adequate maintenance procedures to ensure that property is maintained in good condition in accordance with law, regulation and Board policy.

Safeguards -

The Charter School ensures that adequate safeguards are in place to prevent loss, damage or theft of property:

- a. Any loss, damage or theft will be reported to the CEO and investigated and fully documented, and may be reported to local law enforcement.
- b. If stolen items are not recovered, the Charter School will submit copies of the investigative report and insurance claim to the federal awarding agency.
- c. The Charter School may be responsible for replacing or repairing lost, damaged, destroyed or stolen items.
- d. Replaced equipment is property of the originally funded program and should be inventoried accordingly.
- e. Charter School property may only be loaned in accordance with Board policy and administrative regulations.

Disposition of Property Acquired with Federal Funds -

When the Charter School determines that equipment or supplies acquired under a federal award are no longer needed for the original project or program or for other activities currently or previously supported by a federal awarding agency, the Principal will contact the federal awarding agency or pass-through entity administering the program to obtain disposition instructions, based on the fair market value of the equipment or supplies.

Generally, items with a fair market value of \$5,000 or less that are no longer effective may be retained, sold, purged, or transferred to the Charter School. For items with a fair market value greater than \$5,000, the federal awarding agency is entitled to the federal share of the current market value or sales proceeds.

If the Charter School will be replacing the equipment or supplies, the Charter School may use the existing equipment or supplies as a trade-in or sell the property and use the proceeds to offset the cost of the replacement property.

The Business Manager will be responsible for contacting the federal awarding agency and determining the process for disposition of equipment or supplies.

The Charter School may use the following methods in disposing of unnecessary equipment or supplies acquired with federal funds:

- a. Public auction and/or online sale – generally conducted by a licensed auctioneer.
- b. Salvage – scrap sold to local dealers.
- c. Negotiated sale – normally used when disposing of items of substantial value.
- d. Sealed bid – normally used for items of substantial value or unique qualities.
- e. Pre-priced sale – large quantities of obsolete or surplus equipment or supplies may be sold by this method.
- f. Donation to charitable organizations, for equipment or supplies with little to no value.
- g. Disposition to trash for equipment or supplies with no value.

The Business Manager will be responsible for maintaining records of obsolete and surplus property disposed of, and will report to the federal awarding agency when required.

Procurement – Federal Programs Policy Attachment

Responsibility for Purchasing

The Board of Trustees of the Charter School has outlined standard purchasing responsibilities, methods of purchasing, price quotations and bid requirements in the following Board policies and their accompanying administrative regulations or procedures:

Disqualification, Suspension Or Debarment Of Bidders Policy

Internal Controls Policy

Payment of Claims Policy

Purchases Subject to Bid Policy

Purchases Budgeted Policy

Purchase Methods

When a request for purchase of equipment, supplies or services has been submitted and approved as outlined below, the procurement method to be used will be determined based on the total cost of the purchase as further outlined below. This procedure outlines how the cost thresholds for determining when the quote or formal bidding procedures that are required by state law as reflected in the Purchases Subject to Bid Policy must be modified when making purchases for federally funded purposes to which the Uniform Grant Guidance or USDA regulations apply, so as to comply with both state and federal requirements. Final determination of which purchasing procedures are to be applied is delegated to the Business Manager under the authority of the Board.

Standard Procurement Documents and Purchase Request Process

The Charter School shall use purchase orders or requisition order forms for purchase requests in accordance with the applicable purchase method. The Charter School shall use paper and/or electronic purchasing records, which are pre-numbered and are accessible to designated purchasing staff in the Charter School main office.

Purchase requests by an employee must be submitted to the Principal. Purchase of all budgeted items or items approved by the CEO must be initiated by use of a purchase order or requisition submitted to the Business Manager.

Purchase orders and requisitions shall contain information including, but not limited to:

1. Description of the services to be performed or goods to be delivered.

2. Location of where services will be performed or goods will be delivered.
3. Appropriate dates of service or delivery.

Documentation on purchase orders and requisitions shall be maintained in accordance with the Charter School's Records Management Policy and records retention schedule.

Contracts shall be reviewed by the CEO prior to submission to the Board for approval.

Contracts to which the Uniform Grant Guidance apply shall contain the clauses specified in Appendix II to 2 CFR Part 200 (Contract Provisions for Non-Federal Entity Contracts Under Federal Awards), when applicable.

Micro-Purchases Not Requiring Quotes or Bidding (up to \$10,000)

For purposes of this procedure, micro-purchase means a purchase of equipment, supplies or services for use in federally funded programs using simplified acquisition procedures, the aggregate amount of which does not exceed a base amount of \$10,000. The micro-purchase dollar threshold is adjusted periodically by the federal government, and the threshold most recently established and published in the Federal Register shall apply if other than \$10,000.

The micro-purchase method is used in order to expedite the completion of its lowest dollar small purchase transactions and minimize the associated administrative burden and cost. Procurement by micro-purchase is the acquisition of equipment, supplies or services, the aggregate dollar amount of which does not exceed the micro-purchase threshold.

The micro-purchase maximum for federal purposes is lower than the amount below which the PA Procurement Law allows purchase for non-federal purposes to be made without obtaining at least three written or telephonic quotes or using formal competitive bidding.

To the extent practicable, the Charter School distributes micro-purchases equitably among qualified suppliers when the same or materially interchangeable products are identified and such suppliers offer effectively equivalent rates, prices and other terms. The Business Manager will be responsible to determine the equitable distribution of micro-purchases.

Micro-purchases may be awarded without soliciting competitive quotations if the Charter School considers the price to be reasonable. The Charter School will maintain evidence of this reasonableness in the records of all micro-purchases. Reasonable means

that sound business practices were followed and the purchase is comparable to market prices for the geographic area. Such determinations of reasonableness may include comparison of the price to previous purchases of the same item or comparison of the price of items similar to the item being purchased.

Even if the cost of a purchase qualifies it as a micro-purchase, bidding or small purchase procedures may be used optionally when those procedures may result in cost savings.

Small Purchase Procedures (between \$10,000 and \$22,500)

For purposes of this procedure, small purchase procedures are those relatively simple and informal procurement methods for securing equipment, services, or supplies that cost more than the amount qualifying as a micro-purchase and do not cost \$22,500 or more. Small purchase procedures cannot be used for purchases of equipment or supplies or for construction, repair or maintenance services costing \$22,500 or more because the School Code requires formal competitive bidding at that level of cost.

The base amount at which bidding is required under state law is adjusted for inflation annually, and the amount most recently established and published in the Pennsylvania Bulletin shall apply if other than \$22,500. (24 P.S. Sec. 120)

Because state law does not require bidding for the purchase of services other than construction, maintenance or repairs on school facilities regardless of total cost, small purchase procedures, including a request for proposal (RFP) procedure, may be used for procurement of such other services except when the estimated total cost will be at or over the federal threshold at which formal competitive bidding is required (\$250,000).

If small purchase procedures are used, written or telephonic price or rate quotations are obtained from at least three (3) qualified sources and records of quotes are maintained.

Formal Competitive Bidding (\$22,500 or more)

Publicly Solicited Sealed Competitive Bids:

For purchases of equipment or supplies, or of services for construction, maintenance or repairs of school facilities, sealed competitive bids are publicly solicited and awarded to the lowest responsive and responsible bidder when the total cost is estimated to be \$22,500 or more.

State law does not require bidding for the purchase of services other than construction, maintenance or repairs on school facilities regardless of total cost. For procurement of such other services for federally funded purposes to which the Uniform Grant

Guidance applies, formal competitive bidding will be used when the estimated total cost will be at or over the federal threshold of \$250,000.

The federal competitive bidding dollar threshold is adjusted periodically by the federal government, and the threshold most recently established and published in the Federal Register shall apply if other than \$250,000. (48 CFR Subpart 2.1)

For procurement of services costing at or over the \$250,000 federal threshold other than for construction, maintenance, or repairs on facilities, the use of competitive sealed bidding is considered feasible and appropriate when:

1. A complete, adequate, and realistic specification or purchase description is available;
2. Two or more responsible bidders are willing and able to compete effectively for the business; and
3. The procurement lends itself to a firm fixed-price contract and the selection of the successful bidder can be made principally on the basis of price.

Where specified in bidding documents, factors such as discounts, transportation cost, and life cycle costs must be considered in determining which bid is lowest. Payment discounts will only be used to determine the low bid when prior experience indicates that such discounts are usually taken advantage of. Any or all bids may be rejected if there is a sound documented reason.

Competitive Proposals

State law does not require public school entities to solicit competitive bids for services other than construction, repairs or maintenance of school facilities, for which competitive bidding is required if the cost will be a base amount of \$22,500 or more. State law allows competitive proposals relating to work on facilities in lieu of bidding only in the context of guaranteed energy savings contracts.

Federal regulations allow the use of competitive proposals as an alternative when formal bidding would otherwise be required only to procure architectural and engineering services. Other types of services for federally funded purposes to which the Uniform Grant Guidance applies, professional or otherwise, must be procured using competitive bidding when the cost would meet or exceed the federal threshold for competitive bidding (\$250,000).

In the case of services other than for construction, repairs or maintenance of school facilities costing less than that threshold, the Charter School may use small purchase procedures or micro- purchase procedures as applicable based on total cost. A request for proposal (RFP) process can also meet or exceed the small purchase competition requirements under state law and Board policy for the acquisition of services other than

for construction, repairs or maintenance of school facilities, and can be used if the total cost will be less than \$250,000.

When permitted, the technique of competitive proposals is normally conducted with more than one (1) source submitting an offer, and either a fixed price or cost-reimbursement type contract is awarded. Competitors' qualifications are evaluated and the most qualified competitor is selected, subject to negotiation of fair and reasonable compensation. The Charter School shall comply with other applicable state and federal law and regulations, Board policy and administrative regulations regarding purchasing; the Charter School may consult with the school solicitor or other qualified counsel in determining the required process for purchasing through competitive proposals when necessary.

If this method is used, the following requirements apply:

- a. Requests for proposals must be publicized and identify all evaluation factors and their relative importance. Any response to publicized requests for proposals must be considered to the maximum extent practical.
- b. Proposals must be solicited from an adequate number of qualified sources.
- c. Contracts must be awarded to the responsible firm whose proposal is most advantageous to the program, with price and other factors considered.

Competitive proposals shall be evaluated by the CEO based on factors including but not limited to:

- a. Cost.
- b. Experience of contractor.
- c. Availability.
- d. Personnel qualifications.
- e. Project management expertise.
- f. Understanding of Charter School needs.

Evaluations shall be completed in a timely manner, documented and shall be reviewed by the Board.

Contract/Price Analysis:

The Charter School performs a cost or price analysis in connection with every procurement action in excess of \$250,000, including contract modifications. (2 CFR Sec. 200.323(a)).

A **cost analysis** generally means evaluating the separate cost elements that make up the total price, while a **price analysis** means evaluating the total price, without looking at the individual cost elements.

The method and degree of analysis is dependent on the facts surrounding the particular procurement situation; however, the Business Manager must come to an independent estimate prior to receiving bids or proposals. (2 CFR Sec. 200.323(a)). As part of the analysis, the Business Manager will enact established business practices which may include evaluation of similar prior procurements and a review process.

When performing a cost analysis, the Business Manager negotiates profit 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. (2 CFR Sec. 200.323(b)).

Negotiated Profit

In any procurement in which there has been no price competition, or in which a cost-analysis is performed, profit must be negotiated separately as an element of price. Accordingly, solicitations of bids, proposals or quotes shall require that bids, proposals, or quotes be limited to costs other than profit, and exclude profit.

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. (2 CFR §200.323(b)) When profit must be negotiated as a separate element of the total price, it shall be negotiated by the CEO.

Noncompetitive Proposals

Procurement by noncompetitive proposals means procurement through solicitation of a proposal from only one (1) source and may be used only when one or more of the following circumstances apply:

1. The item is available only from a single source.

2. The public exigency or emergency for the requirement will not permit a delay resulting from competitive solicitation. An **emergency** exists whenever the time required for the Board to act in accordance with regular procedures would endanger life or property or threaten continuance of existing school classes.
3. The federal awarding agency or pass-through entity expressly authorizes noncompetitive proposals in response to a written request from the Charter School.
4. After solicitation of a number of sources, the Charter School determines the competition is inadequate.

In addition to standard procurement policy and procedures, the Charter School will document the grounds for using the noncompetitive method in lieu of an otherwise required competitive method of procurement, which may include written confirmation from the contractor as the sole source of the item. Documentation must be submitted to and maintained by the Business Office.

All noncompetitive proposals will ultimately be approved by the Board. The Charter School may utilize legal advice from the solicitor regarding noncompetitive proposals.

A cost or price analysis will be performed for noncompetitive proposals when the price exceeds \$250,000.

Purchase Cards

The Charter School approves the use of procurement cards for permissible purchases by designated employees to improve the efficiency of purchasing activities, reduce processing expenses, improve controls for small-dollar purchases, and streamline contractor payment.

Procurement cards may be used for purchases under federal programs. The use of procurement cards is governed by Board Procurement Cards and established administrative regulations.

Full and Open Competition

All procurement transactions must be conducted in a manner providing full and open competition consistent with 2 CFR Sec. 200.319. 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 must be 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 in order 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.
7. Any arbitrary action in the procurement process.

The Education Department General Administrative Regulations further requires the following to ensure adequate competition.

Minority Businesses, Women’s Business Enterprises, Labor Surplus Area Firms

The Charter School must take necessary affirmative steps to assure that minority businesses, women’s business enterprises, and labor surplus area firms are used when possible. Affirmative steps must include: (2 CFR Sec. 200.321)

1. Placing qualified small and minority business 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 purchasing requirements, when economically feasible, into smaller tasks or quantities to permit maximum participation by small and minority business 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.
6. Requiring the prime contractor, if subcontracts are let, to take the affirmative steps listed above.

Geographical Preferences Prohibited

The Charter School must 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.

Prequalified Lists

The Charter School must 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, the Charter School must not preclude potential bidders from qualifying during the solicitation period.

Solicitation Language

The Charter School must 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 at all 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 as a means 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 identify all requirements which the offerors must fulfill and all other factors to be used in evaluating bids or proposals.

Avoiding Acquisition of Unnecessary or Duplicative Items

The Charter School must avoid the acquisition of unnecessary or duplicative items. Additionally, consideration must be given to consolidating or breaking out procurements to obtain a more economical purchase; and, where appropriate, an analysis must be made of leases versus purchase alternatives, and any other appropriate analysis to determine the most economical approach.

These considerations are given as part of the process to determine the allowability of each purchase made with federal funds.

Use of Intergovernmental Agreements and Cooperative Purchasing

To foster greater economy and efficiency, the Charter School enters into state and local intergovernmental agreements where appropriate for cooperative purchasing or use of common or shared goods and services, as permitted by the Intergovernmental Cooperation Act and the Commonwealth Procurement Code. (53 Pa. C.S. Ch. 23; 62 Pa. C.S. Ch. 19)

When procuring supplies or services for federally funded purposes to which the Uniform Grant Guidance applies, the Charter School shall verify that the organization conducting the procurement pursuant to such agreements complies with the applicable requirements and standards of the Uniform Grant Guidance as outlined in this procedure.

Use of Federal Excess and Surplus Property

The Charter School considers the use of federal excess and surplus property in lieu of purchasing new equipment and property whenever such use is feasible and reduces project costs.

Debarment and Suspension

The Charter School awards 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.

The Charter School may not subcontract with or award subgrants to any person or company who is debarred or suspended. For all contracts over \$25,000 the Charter School verifies that the contractor with whom the Charter School intends to do business is not excluded or disqualified.

All successful contractors must provide written certification that they have not been suspended or debarred from federal projects. The Business Manager will be responsible for verification. Such verification may include accessing the online federal System for Award Management (SAM) to determine whether any relevant party is subject to any suspension or debarment restrictions.

Maintenance of Procurement Records

The Charter School must maintain records sufficient to detail the history of all procurements. These records will include, but are not necessarily limited to the following: rationale for the method of procurement, selection of contract type, contractor selection or rejection, the basis for the contract price (including a cost or price analysis), and verification that the contractor is not suspended or debarred.

Maintenance of records of procurement will be governed by Board policy relating to Records Management and established administrative regulations.

Time and Materials Contracts

The Charter School may use a time and materials type contract only: (1) after a determination that no other contract is suitable; and (2) if the contract includes a ceiling price that the contractor exceeds at its own risk. Time and materials type contract means a contract whose cost to the Charter School is the sum of: the actual costs of materials, and direct labor hours charged at fixed hourly rates that reflect wages, general and administrative expenses, and profit.

The Charter School must assert a high degree of oversight in order to obtain reasonable assurance that the contractor is using efficient methods and effective cost controls.

Settlements of Issues Arising Out of Procurements

The Charter School 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. These issues include, but are not limited to, source evaluation, protests, disputes, and claims. These standards do not relieve the Charter School of any contractual responsibilities under its contracts. Violations of law will be referred to the local, state, or federal authority having proper jurisdiction.

Protest Procedures to Resolve Dispute

The Charter School maintains protest procedures to handle and resolve disputes relating to procurements and, in all instances, discloses information regarding the protest to the awarding agency. Protest procedures will be acted on in accordance with current state law and regulations, established Charter School administrative regulations and the advice of the solicitor.

Food Service Program Notes:

Exemption from Bidding for Perishable Food Items -

The School Code exempts purchases of perishable food items from bidding requirements. Bidding for perishable food items is required only if the cost would be at or over the federal threshold at which formal competitive bidding is required (\$250,000). Small purchase procedures may be used for purchases below \$250,000, or micro-purchase procedures for purchases below \$10,000. Use of bidding should be considered as an option if it is feasible and likely to result in cost savings. (24 P.S. Sec. 504(d))

Geographic Preferences -

The Charter School is permitted to apply a geographic preference when procuring unprocessed locally grown or locally raised agricultural products. When a geographic preference is applied, the Charter School has discretion to determine the local area to which the geographic preference option will be applied.

Unprocessed locally grown or locally raised agricultural products means only those agricultural products that retain their inherent character. The effects of the following food handling and preservation techniques shall not be considered as changing an agricultural product into a product of a different kind or character: cooling; refrigerating; freezing; size adjustment made by peeling, slicing, dicing, cutting, chopping, shucking, and grinding; forming ground products into patties without any additives or fillers; drying/dehydration; washing; packaging (such as placing eggs in cartons), vacuum packing and bagging (such as placing vegetables in bags or combining two (2) or more types of vegetables or fruits in a single package); the addition of ascorbic acid or other preservatives to prevent oxidation of produce; butchering livestock and poultry; cleaning fish; and the pasteurization of milk. (7 CFR Sec. 210.21, 215.14a, 220.16)

Buy American -

The Charter School shall purchase, to the maximum extent practicable, domestic commodities or products for food service purposes.

Mandatory Contract Clauses -

The following provisions shall be included in all cost reimbursable contracts for food services purchases, including contracts with cost reimbursable provisions, and in solicitation documents prepared to obtain offers for such contracts: (7 CFR Sec. 210.21, 215.14a, 220.16)

1. Allowable costs will be paid from the nonprofit school food service account to the contractor net of all discounts, rebates and other applicable credits accruing to or received by the contractor or any assignee under the contract, to the extent those credits are allocable to the allowable portion of the costs billed to the school food authority;
2. (a) The contractor must separately identify for each cost submitted for payment to the school food authority the amount of that cost that is allowable (can be paid from the nonprofit school food service account) and the amount that is unallowable (cannot be paid from the nonprofit school food service account); or (b) The contractor must exclude all unallowable costs from its billing documents and certify that only allowable costs are submitted for payment and records have been established that maintain the visibility of unallowable costs, including directly associated costs in a manner suitable for contract cost determination and verification;
3. The contractor's determination of its allowable costs must be made in compliance with the applicable departmental and program regulations and Office of Management and Budget cost circulars;
4. The contractor must identify the amount of each discount, rebate and other applicable credit on bills and invoices presented to the school food authority for payment and individually identify the amount as a discount, rebate, or in the case of other applicable credits, the nature of the credit. If approved by the state agency, the school food authority may permit the contractor to report this information on a less frequent basis than monthly, but no less frequently than annually;
5. The contractor must identify the method by which it will report discounts, rebates and other applicable credits allocable to the contract that are not reported prior to conclusion of the contract; and
6. The contractor must maintain documentation of costs and discounts, rebates and other applicable credits, and must furnish such documentation upon request to the school food authority, the state agency, or the department.

Contracts with Food Service Management Companies -

Procedures for selecting and contracting with a food service management company (FSMC) shall comply with guidance provided by the Pennsylvania Department of Education, Division of Food and Nutrition, including standard forms, procedures and timelines for solicitation, selection and approval of proposals and contracts. (7 CFR Sec. 210.16, 210.19, 210.21, 215.14a, 220.16)

Pre-Plated Meals -

Procedures for selecting and contracting with contractors of pre-plated meals shall comply with guidance provided by the Pennsylvania Department of Education, Division of Food and Nutrition, including standard forms, procedures and timelines for solicitation, selection and approval of proposals and contracts. (7 CFR Sec. 210.16, 210.19, 210.21, 220.16)

The micro-purchase threshold and simplified acquisition threshold may be periodically adjusted for inflation. See 2 CFR §200.67. Changes in these thresholds are required to be published in the Federal Register.

Urban Pathways K-5 College Charter School

Board of Trustees Policy

FINANCES POLICY

The Board of Trustees (the “Board”) of the Urban Pathways K-5 College Charter School (“Charter School”) recognizes its responsibility to the taxpayers to be sure that public monies expended by the Charter School are utilized for the furtherance of pupil education in a manner that will ensure full value to the taxpayers, and that adequate constraints and records are established to ensure that end.

The Chief Executive Officer (“CEO”) has the authority and responsibility, in conjunction with the Board to prepare the budget. The Board has the authority and responsibility to approve the budget, winning bids, and resolutions authorizing certain expenditures of the Charter School.

To meet the goals of this policy, the Board requires the CEO to establish sound accounting procedures based upon State and federal recommended accounting procedures and upon the recommendation of the local, state, and federal auditors, and to institute effective business practices and recommend suitable accounting equipment, where necessary.

In accordance with State law, the Board will authorize an annual audit by an independent auditor. In addition, a Board audit committee may be established.

Neither federal funds received directly from the federal government or indirectly through the Pennsylvania Department of Education or other administrative agency nor state funds or any donations or gifts will be used for any partisan political activity.

TO THE EXTENT THAT ANYTHING IN THIS POLICY COULD BE CONSTRUED TO CONFLICT WITH THE SCHOOL’S CHARTER OR APPLICABLE STATE AND/OR FEDERAL LAWS, THE APPLICABLE STATE AND/OR FEDERAL LAWS AND/OR CHARTER CONTROL.

ADOPTED this day _____ of _____, 2023

President

Secretary

Urban pathways K-5 College Charter School

Board of Trustees Policy

FINANCIAL REPORTING POLICY

It is the purpose of this policy to establish financial reporting requirements to the Board of Trustees of the Urban pathways K-5 College Charter School (“Charter School”).

The Chief Executive Officer (“CEO”) or his/her designee shall, as soon as is practicable after the end of each fiscal year, submit to the Board of Trustees an annual financial statement for the Charter School for the past year. Such statement shall include itemized data with respect to all assets of the Charter School, outstanding indebtedness, if any, and such other information relating to the finances of the Charter School as the Board may deem necessary or proper.

On a monthly basis, the CEO or his/her designee shall prepare a monthly financial report for the Charter School’s operating fund including:

- a. Balance Sheet;
- b. Statement of Revenues, Expenditures and Budget Comparison;
- c. Listing of Disbursements; and
- d. Statement of Cash Flow.

TO THE EXTENT THAT ANYTHING IN THIS POLICY COULD BE CONSTRUED TO CONFLICT WITH THE SCHOOL'S CHARTER OR APPLICABLE STATE AND/OR FEDERAL LAWS, THE APPLICABLE STATE AND/OR FEDERAL LAWS AND/OR CHARTER CONTROL.

ADOPTED this day _____ of _____, 2023

President

Secretary

Urban Pathways K-5 College Charter School

Board of Trustees Policy

GASB 54 FUND BALANCE POLICY

The Board of Trustees of the Urban Pathways K-5 College Charter School (“Charter School”) recognizes that the maintenance of a fund balance is essential to the preservation of the financial integrity of and is fiscally prudent for the Charter School. This policy establishes goals and provides guidance concerning the fund balance maintained by the Charter School.

Fund Balance is a measurement of available financial resources. Fund balance is the difference between total assets and total liabilities in each fund.

GASB Statement 54 distinguishes fund balance classification based on the relative strength of the constraints that control the purposes for which specific amounts can be spent. GASB 54 requires the fund balance amounts to be properly reported within one of the fund balance categories list below:

- A. Nonspendable fund balance category includes amounts that cannot be spent because they are in an unspendable form or legally or contractually required to be maintained intact and property held for resale, such as fund balance associated with inventories, prepaids, long-term loans and notes receivable;
- B. Restricted fund balance category includes amounts that can be spent only for the specific purposes stipulated by constitution, external resource providers (i.e. creditors, grants or donations), or through enabling legislation;
- C. Unrestricted fund balance category which includes:
 - 1. Committed fund balance classification includes amounts that can be used only for the specific purposes determined by a formal action of the Board of Trustees (i.e. Board policy or action);
 - 2. Assigned fund balance classification includes amounts that are intended to be used by the Charter School for specific purposes, such as rate stabilization fund or segregation of an amount intended to be used at

some time in the future, but do not meet the criteria to be classified as restricted or committed; and

3. Unassigned fund balance is the residual classification for the Charter School's general fund and includes all spendable amounts not contained in the other classifications, these funds are not restricted in any manner.

3. Guidelines

The Board directs the development of the following fund balances in accordance with GASB 54. The disposition of the fund balances shall include the following guidelines.

A. Order of Use of Fund Balances - When amounts are available in the fund balances for a particular purpose, there are no restrictions on the order of the fund balances used for disbursements. Order of the fund balances used for disbursements is at the discretion of the Chief Executive Officer ("CEO") and/or their designee.

B. Order of Use of Unrestricted Fund Balances - When amounts are available in the Unrestricted Fund Balances for a particular purpose, there are no restrictions on the order of the Unrestricted Fund Balances used for disbursements. Order of the Unrestricted Fund Balances used for disbursements is at the discretion of the CEO and/or their designee.

Disposition of Fund Balances - The Charter School shall establish the following specific Unrestricted Fund Balances in accordance with GASB 54: Committed, Assigned and Unassigned fund balances.

a. Committed Fund Balance - Establishment and purpose of Committed Fund Balances must be for the purpose approved by the Board. Specific disbursements are at the discretion of the CEO and/or their designee. By June 30 of each year Committed Fund Balances will be determined in accordance with GASB 54 and shall include, but not limited to, the following:

i. New Initiatives Fund

- Purpose - To pay for new and innovative services with future potential.
- Annual Funding - Board discretion for annual committed balance.

ii. New Building / Building Improvement Fund

- Purpose – To fund future building purchase and renovations.
- Annual Funding – The Board will determine amount assigned to this fund. Funds can be used to pay for the cost of major capital projects, building purchase or renovations, or debt service payments on loans used to finance the construction or renovations.

iii. Capital Equipment/Software/Hardware

- Purpose – To pay for capital purchases as needed for increased enrollments and staff expansion.
- Annual Funding – The Board will determine amounts assigned to this fund.

iv. Curriculum Development

- Purpose – To pay for development of online curriculum which is the intellectual property of the Charter School.
- Annual Funding – The Board will determine the amount committed to this fund.

v. Program Stabilization Fund

- Purpose – To provide funding which will allow for business continuation given a pandemic event.
- Annual Funding – Board discretion for annual committed balance.

vii. PSERS Stabilization Fund

- Purpose – To provide funding to lessen the impact of PSERS projected increases/changes in rates on Charter School.
- Annual Funding – Additional retirement expense based on a percentage of salaries. Determined annually by the Board.

b. Assigned Fund Balances –Expenditures from Assigned Fund Balances to be used for a specific purpose, but not considered restricted or committed. Expenditures from the Assigned Fund balances are at the discretion of the Board. By June 30 of each year Assigned Fund Balances will be determined in accordance with GASB 54.

c. **Unassigned Fund Balance** – Total fund balance in the General Fund in excess of Nonspendable, Restricted, and Committed and Assigned Fund Balances. Expenditures from Unassigned Fund Balances may be used for any purpose at the discretion of the CEO and/or their designee.

TO THE EXTENT THAT ANYTHING IN THIS POLICY COULD BE CONSTRUED TO CONFLICT WITH THE SCHOOL’S CHARTER OR APPLICABLE STATE AND/OR FEDERAL LAWS, THE APPLICABLE STATE AND/OR FEDERAL LAWS AND/OR CHARTER CONTROL.

ADOPTED this day _____ of _____, 2023

President

Secretary

Urban Pathways K-5 College Charter School

Board of Trustees Policy

INVESTMENTS POLICY

The Urban Pathways K-5 College Charter School (“Charter School”) shall optimize its return through investment of its unencumbered cash balances in such ways as to minimize non-invested balances and maximize return on investments in accordance with and as permitted by state and federal law. All investments of the Charter School shall be in accordance with the following policy:

Funds of the Charter School may be invested in U.S. Treasury Securities or placed in time accounts or share accounts of institutions insured by the FDIC to the extent such certificates are insured by a proper bond in accordance with law and Board of Trustees (“Board”) policy.

Investment of Charter School funds may be made in the sole discretion of the Board when operating within applicable statutes, provided that no commitment of this Board may be put in default at time due but be paid properly and promptly.

Delegation of Responsibility

The Board shall delegate to a designated individual the responsibility to manage the Charter School’s investment program, in accordance with written, Board approved rules and procedures for operation of the investment program. The Board requires that the Business Manager report to the Board monthly:

- Amount of funds in investments;
- Interest earned to date and anticipated interest on investments;
- Types and current market value of each investment and the interest rate on each;
- Transactions occurring since the last report;
- Collateralization of deposits exceeding insurance limits.
- Other information required by the Board.

The Business Manager working with the Treasurer and President of the Board shall, as soon as is practicable after the end of each fiscal year, and prior to the annual meeting of the Board submit to the Board an annual financial statement for the Charter School for the past year. Such statement shall include itemized data with respect to all assets of the Charter School, outstanding indebtedness, if any, and such other information

relating to the finances of the Charter School as the Board may deem necessary or proper.

The Board shall, consistent with law, determine which officers and employees shall be required to furnish surety bonds, conditioned on the faithful performance of their respective duties, to determine the amount of such bonds, and to approve the surety or sureties in each case.

The Board shall have the power to amend the budget to authorize the transfer of any unencumbered balance or portion thereof from one appropriation to another.

The Board shall have the power to make additional appropriations or increase existing appropriations to meet emergencies which could not be anticipated when the budget was adopted, the funds therefore to be provided from unexpended balances in existing appropriations, from unappropriated revenues if any, or from temporary loans. Under no circumstances may the Board increase the aggregate total of budget appropriations unless unappropriated revenues become available in sufficient amount to maintain the budget in balance, in which event the Board may make additional or increased appropriations.

The Board shall, at least thirty (30) days before the end of the fiscal year, adopt by majority vote of all its members an operating budget setting forth in lump sum amounts the proposed expenditures of the Board during the next fiscal year and the estimated receipts of the Board during the next fiscal year including approximate estimates of proposed revenues and all other receipts. The total amount of proposed expenditures shall not exceed the amount of funds available for the Charter School's purposes.

Funds of the Board may be withdrawn from approved public depositories, or negotiable instruments owned by the Board may be sold before maturity at the sole discretion of the Board so long as such withdrawals or sales are beneficial to the Charter School and are permissible in accordance with applicable state and federal law.

All securities shall be purchased in the name of the Charter School.

All investment advisors or bidders shall verify in writing that they have received a copy of this Board policy. Such written statement shall indicate that they have read and understand this policy and all applicable laws related to Charter School investments, along with their intent to comply fully with these requirements. The Charter School shall require all investment advisors/bidders to submit annually any or all of the following, as appropriate:

1. Audited financial statements.
2. Proof of National Association of Securities Dealers (NASD) certification.
3. Proof of state registration.
4. Rating from a recognized rating agency.

Disclosure

Designated officers and employees involved in the Charter School's investment process shall disclose any personal business activity that could conflict with the proper execution and management of the investment program or could impair their ability to make impartial decisions.

Audit

The Board directs that all investment records be subject to annual audit by the Charter School's independent auditors. The audit shall include but not be limited to independent verification of amounts and records of all transactions, as deemed necessary by the independent auditors.

It shall be the responsibility of the investment advisor and/or bidder to maintain necessary documents to permit independent audit of the Intermediate Unit's investments.

Bond Proceeds

Bond proceeds shall be invested in accordance with the Local Government Unit Debt Act and applicable federal and state laws, subject to approval by the solicitor and/or bond counsel and the Board. Investment transactions arising from bond proceeds shall be reported monthly to the Board, in accordance with policy.

Compliance With GAAP

The following is intended to guide Charter School investments as limited by law:

1. Charter School funds shall not be invested in foreign currency and shall have no related risk that would require disclosure pursuant to GASB Statement 40.
2. Charter School investments shall limit the exposure to loss of principal due to market changes in interest rates.
3. Charter School investments in authorized instruments that are not backed by the "full faith and credit" of the federal or state government shall be limited to those with the highest two (2) credit ratings available for such instruments issued by a recognized organization. If, after purchase, the rating of any instrument is reduced and no longer in compliance with Board policy, the individual responsible for Charter School investments shall make appropriate adjustments and advise the Board at the earliest opportunity.
4. When Charter School funds are invested in any one (1) issuer other than designated depository accounts (which includes external investment pools), and securities issued or explicitly guaranteed by the U.S. Government, owned

directly by the Charter School, the amount of the investment shall be unlimited, but the Board shall be notified of such investment monthly.

5. For purposes of interest rate disclosure in the annual financial report, the method of determining interest rate risk shall be based on weighted average maturity.

Protection Of Bank Balances In Excess Of FDIC Limits

When Charter School cash is deposited in an authorized depository, if the cash balance exceeds the insurance limits, Charter School funds shall be collateralized pursuant to law. The collateral shall be limited to investments authorized by law. It shall be the responsibility of the CEO or designee to verify with the depository the value of the instrument(s) based on the instrument being “marked to market.” Verification of the value of the collateral instrument(s) shall occur no less than quarterly. Following a review of valuation, the CEO or designee may request an additional review by the Charter School’s investment advisors or financial consultant, and shall require additional collateral if the existing collateral has declined in value and exposes the Charter School to potential loss of principal. The Board shall be advised of the status of the valuation review and any additional collateral at the first meeting following the review.

TO THE EXTENT THAT ANYTHING IN THIS POLICY COULD BE CONSTRUED TO CONFLICT WITH THE SCHOOL’S CHARTER OR APPLICABLE STATE AND/OR FEDERAL LAWS, THE APPLICABLE STATE AND/OR FEDERAL LAWS AND/OR CHARTER CONTROL.

ADOPTED this day _____ of _____, 2023

President

Secretary

Urban pathways K-5 College Charter School

Board of Trustees Policy

PAYMENT OF CLAIMS POLICY

It is the purpose of the Board of Trustees (the "Board") of the Urban pathways K-5 College Charter School ("Charter School"), to effect the prompt payment of bills but, at the same time, to ensure that due care has been taken in the review of such bills.

Each bill or obligation of the Charter School must be fully itemized and verified by the Business Manager before a check can be drawn for its payment.

It shall be the responsibility of the Business Manager upon receipt of an invoice to verify that the purchase invoice is in order, the goods were received in acceptable condition or services were satisfactorily rendered, funds are available to cover the payment, the item is in a classification for which the Board budgeted, and the invoice is for the amount contracted.

Upon the approval of an order, the Business Manager shall prepare a check for payment and cancel the commitment placed against the appropriate account.

No check shall be made out to cash and all checks shall be executed in accordance with the Bylaws and Internal Controls Policy.

Have the persons signing the check (Board members, Chief Executive Officer ("CEO")) initial the invoice to indicate review of the invoice. Two signatures are required for all checks above the amount approved by the Board for CEO signature alone. These two signatures shall consist of the CEO or his/her designee, if applicable, and an authorized Board Trustee.

Signed checks shall be handed over to the secretary and/or administrative assistant to be mailed out. Such checks are to be mailed without allowing them to be returned to the employee(s) responsible for accounts payable.

TO THE EXTENT THAT ANYTHING IN THIS POLICY COULD BE CONSTRUED TO CONFLICT WITH THE SCHOOL’S CHARTER OR APPLICABLE STATE AND/OR FEDERAL LAWS, THE APPLICABLE STATE AND/OR FEDERAL LAWS AND/OR CHARTER CONTROL.

ADOPTED this day _____ of _____, 2023

President

Secretary

Urban Pathways K-5 College Charter School

Board of Trustees Policy

PAYROLL AUTHORIZATION POLICY

Employment of all permanent, temporary, and part-time Urban Pathways K-5 College Charter School (“Charter School”) personnel must be approved by the Board of Trustees (the “Board”). Authorization to pay follows therefrom.

Actions by the Board to employ or re-employ on a contractual basis (i.e., for a fixed period of time) shall include the name of the individual, the position title, the period of employment and whether such employment is “at will”.

Actions by the Board to employ temporary or part-time personnel (i.e., by the hour or day) shall include the name of the individual, the position title and the rate of pay.

Daily sign-in and sign-out procedures adequate to meet wage and hour requirements and Board policy are required of all employees.

Salary or wages may be withheld for unapproved time off in accordance with Board policy by the **(INSERT POSITION)** to the extent permitted by applicable law.

TO THE EXTENT THAT ANYTHING IN THIS POLICY COULD BE CONSTRUED TO CONFLICT WITH THE SCHOOL’S CHARTER OR APPLICABLE STATE AND/OR FEDERAL LAWS, THE APPLICABLE STATE AND/OR FEDERAL LAWS AND/OR CHARTER CONTROL.

ADOPTED this _____ day of _____, 2023

President

Secretary

Urban pathways K-5 College Charter School

Board of Trustees Policy

PER PUPIL ALLOTMENT POLICY

The Urban pathways K-5 College Charter School (“Charter School”), receiving pupils who are residents of a school district other than the Charter School’s chartering school district, shall assess the per pupil allotment in accordance with the Pennsylvania School Code.

It shall be the responsibility of the Charter School Chief Executive Officer or designee to invoice the per pupil allotment for approved students. Such rates shall be determined annually. Billings based upon such rates will be made immediately following the billing period.

TO THE EXTENT THAT ANYTHING IN THIS POLICY COULD BE CONSTRUED TO CONFLICT WITH THE SCHOOL’S CHARTER OR APPLICABLE STATE AND/OR FEDERAL LAWS, THE APPLICABLE STATE AND/OR FEDERAL LAWS AND/OR CHARTER CONTROL.

ADOPTED this _____ day of _____, 2023

President

Secretary

Urban Pathways K-5 College Charter School

Board of Trustees Policy

PETTY CASH POLICY

Petty cash funds may be used for designated purposes so long as such funds are subject to adequate controls and safeguards.

The Board of Trustees ("Board") of the Urban Pathways K-5 College Charter School ("Charter School") authorizes the establishment of petty cash funds in the care of the Chief Executive Officer or other administrators charged with the responsibility for the management and administration of budgetary allocations/ appropriations or to those serving in acting capacities.

Each responsible person shall ensure that petty cash funds are spent only for designated purposes for which the fund was established, no single purchase for petty cash exceeds \$500, each request for funds is made in writing with any confirming papers attached and is signed by the requestor, funds are not used to circumvent the regular purchasing procedure, and the petty cash box is secured daily.

A responsible custodian may choose to select an employee from the Charter School staff to carry out the functional operations on his/her behalf related to the maintenance, disbursement, record keeping, and safekeeping of the imprest funds. The functional custodian is directly accountable to the responsible custodian.

The responsible custodian shall provide for the safekeeping of funds and records.

TO THE EXTENT THAT ANYTHING IN THIS POLICY COULD BE CONSTRUED TO CONFLICT WITH THE SCHOOL’S CHARTER OR APPLICABLE STATE AND/OR FEDERAL LAWS, THE APPLICABLE STATE AND/OR FEDERAL LAWS AND/OR CHARTER CONTROL.

ADOPTED this day _____ of _____, 2023

President

Secretary

Urban Pathways K-5 College Charter School

Board of Trustees Policy

PREVAILING WAGE POLICY

The Charter School Law requires Boards of Trustees of charter schools to comply with the Pennsylvania Prevailing Wage Act. This Act requires every public entity to ensure that the prevailing wage rates are paid to workers employed on any construction, reconstruction, demolition, alteration, or repair work in excess of \$25,000. The prevailing wages, as determined by the Department of Labor and Industry, must be incorporated into the bidding specifications and the final contract for any work that falls under the Pennsylvania Prevailing Wage Act.

Definitions

Maintenance Work means the repair of existing facilities when the size, type or extent of such facilities is not thereby changed or increased.

Public Work means construction, reconstruction, demolition, alteration and/or repair work other than maintenance work, done under contract and paid for in whole or in part out of the public body's funds where estimated cost of total project is in excess of \$25,000. Note that this does not include work under a rehabilitation or manpower training program.

Whenever a project is to be undertaken that includes work on the Urban Pathways K-5 College Charter School ("Charter School") property, the administration of the Charter School shall determine whether the work qualifies as Public Work as defined by this policy before presenting the proposed project to the Board of Trustees for approval. If in doubt, the administration shall seek an opinion from the Charter School's legal counsel.

If the administration has determined that a project is subject to the Pennsylvania Prevailing Wage Act, before drafting public bidding specifications for the project, the administration will request a determination of the general prevailing minimum wage rates from the Department of Labor and Industry. Generally this will be done by completing the electronic form maintained on the Department of Labor and Industry's website. Once obtained from the Department of Labor and Industry, the prevailing

minimum wage rates are good for one hundred twenty (120) days only. If the contract is not awarded within one hundred twenty (120) days from the determination rate, a new request must be submitted with the Department of Labor and Industry.

Appealing the Prevailing Minimum Wage Rates

On receipt of the prevailing minimum wage rates from the Department of Labor and Industry, the administration shall immediately review the rates with the architect, construction manager, or other construction professional to determine if the rates are appropriate. If the rates do not appear to be appropriate, the administration shall instruct legal counsel for the Charter School to file a petition to review the determination of the prevailing minimum wage rates with the Secretary of Labor and Industry. This must be done within ten (10) days of the issuance of the specifications for the particular contract.

Once the specifications are published, a potential bidder or union representatives may also file a challenge to the prevailing minimum wage rates issued for the project. If the Charter School receives notice of a challenge, it will issue a notice telling all potential bidders that the prevailing minimum wage rates contained in the specifications have been challenged, and that the closing date for submission of bids will be extended until five days after the final determination by the Secretary of Labor and Industry of the prevailing minimum wage rates.

Required Contract Provisions

The administration shall ensure that the general prevailing minimum wage rates (including contributions for employee benefits) obtained from the Department of Labor and Industry are contained in the specifications for any project that is subject to the Pennsylvania Prevailing Wage Act.

In addition, the specifications for a project should contain the form of the contract that will be signed with the prevailing bidder. In addition to the prevailing minimum wage rates, this contract must also include:

- A) A requirement that the workers shall be paid at least the prevailing minimum wage rates as determined by the Department of Labor and Industry;
- B) A requirement that the prevailing minimum wage rates apply to work performed both by the contractor and by any subcontractors hired by the contractor;

- C) A requirement that the contract inserted into each subcontract contains the same requirements with respect to the prevailing minimum wage as are included in the contractor's agreement with the Charter School;
- D) A prohibition from contractor employing any workers on the project except for those for whom a prevailing minimum wage rate has been obtained. The contract will further provide that if the contractor must employ such an employee to complete the contracted work, that the contractor will notify the Charter School, which will then obtain a determination of the prevailing minimum wage rate for the omitted trade.
- E) A requirement that the contractor and each of its subcontractors post for the entire period of construction the prevailing minimum wage rates obtained from the Department of Labor and Industry in a prominent and easily accessible place at the work site and at the places used to pay workers their wages. This posting shall contain at least the name of the project, the name of the Charter School, the crafts and classifications of workers in the determination made by the Department of Labor and Industry, and the prevailing minimum wage rate for each craft and classification, and a statement advising workers that if they have been paid less than the prevailing minimum wage rate for their job classification or that the contractor or subcontractor is not complying with the Pennsylvania Prevailing Wage Act, they may file a protest in writing with the Secretary of Labor and Industry within three (3) months of the date of the occurrence, objecting to the payment to a contractor to the extent of the amount due or to become due to them as wages for work performed on the public work project. Any changes in the prevailing minimum wage rate shall also be posted.
- F) A requirement that the contractor and subcontractors keep an accurate record showing the name, craft or classification, number of hours worked per day and the actual hourly rate of wage paid, including employee benefits, to each worker employed on the project. The contract shall require the contractor to include the deductions from each worker. The contract shall further require the contractor to keep the records for two (2) years from the date of payment, and it shall require the contractor to make the records available to the Charter School or the Department of Labor and Industry on request.
- G) A requirement that apprentices shall be limited to numbers in accordance with a bona fide apprenticeship program registered with an approved by the Pennsylvania Apprenticeship and Training Council.

- H) A requirement that wages shall be paid without deductions except authorized deductions and that employers who are not parties to a contract requiring contributions to employee benefits which the Department of Labor and Industry has determined to be included in the prevailing minimum wage rate shall pay the monetary equivalent directly to the workers.
- I) A prohibition from paying workers on a lump sum basis, a piece work system, or a price certain for the completion of a certain amount of work regardless of the average hourly earnings that result from these payment methods.
- J) A requirement that the contractor and each of its subcontractors file a statement each week and a final statement at the conclusion of the work, under oath, on the form drafted by the Department of Labor and Industry, certifying that workers have been paid wages in strict conformity with the provisions of the contract as required by the Pennsylvania Prevailing Wage Act or if wages remain unpaid to set forth the amount of wages due and owing to each worker respectively.
- K) A provision allowing the Charter School, if directed by the Secretary of Labor and Industry, to withhold the amount of unpaid wages for the benefit of the workers whose wages have not been paid and to pay those wages directly to the worker, and that payments made directly to workers under an order from the Secretary of Labor and Industry shall be treated as if they were payments made to the Contractor.
- L) A provision allowing the Charter School to terminate the contract if the Secretary of Labor and Industry determines that the contractor has failed to comply with the Pennsylvania Prevailing Wage Act and directs the Charter School to terminate the contract. An additional provision shall be included stating that in the event of a termination of the contract for failure to pay the prevailing minimum wage, regardless of any other provision of the contract, the Charter School shall only be required to pay the contractor for work actually performed as of the date of termination for which the required wages were paid.

In addition, the contract shall incorporate, by reference, the provisions of the Pennsylvania Prevailing Wage Act and the Department of Labor and Industry's prevailing wage regulations.

During the course of the project, the administration of the Charter School shall periodically check to ensure that the prevailing minimum wage rates are being posted in accordance with the Pennsylvania Prevailing Wage Act.

Requirements before Final Payment

Before final payment is made to any contractor, the administration of the Charter School will ensure that the final statement under oath from the contractor and each of its subcontractors has been received. If such a final statement has not been received, or if the statement shows that the prevailing minimum wage rates have not been paid, the administration will inform the Treasurer of the Board of Trustees, who shall withhold final payment to the contractor until a satisfactory statement is received.

However, if a contractor complies with the Pennsylvania Prevailing Wage Act but a subcontractor fails to do so, the Charter School shall make the final payment to the contractor despite the subcontractor’s failure to comply. If the contractor or subcontractor does not comply with the requirements of the Pennsylvania Prevailing Wage Act, the Treasurer will then inform the Secretary of Labor and Industry.

TO THE EXTENT THAT ANYTHING IN THIS POLICY COULD BE CONSTRUED TO CONFLICT WITH THE CHARTER OR APPLICABLE STATE AND/OR FEDERAL LAWS, THE APPLICABLE STATE AND/OR FEDERAL LAWS AND/OR CHARTER CONTROL.

ADOPTED this _____ day of _____, 2023

President

Secretary

Urban pathways K-5 College Charter School

Board of Trustees Policy

Procurement Cards Policy

Authority

The Board of Trustees of Urban pathways K-5 College Charter School (“Charter School”) approves the use of procurement cards for permissible purchases and/or services to be purchased for the official use of Charter School by designated employees to improve the efficiency of purchasing activities, reduce processing expenses, improve controls for small-dollar purchases, and streamline vendor payment. The Board directs the administration to establish safeguards to prevent misuse of such cards.

The Board shall approve the list of employees authorized to use Charter School procurement cards.

The Board shall purchase adequate insurance coverage for procurement card misuse.

Definition

Procurement card - a corporate charge card designed to reduce the cost and administrative burden of small-dollar purchases.

Delegation of Responsibility

A list of authorized users of procurement cards shall be maintained in the business office and shall include employees in designated positions.

All use of procurement cards shall be supervised and monitored on a regular basis by the Business Manager and CEO who shall ensure the use of such cards is in accordance with the funds budgeted for this purpose.

Proper accounting measures for the use of procurement cards shall be developed, distributed, implemented, and monitored by the Business Manager and CEO.

An employee authorized to use a procurement card shall maintain adequate security of the card while it is in his/her possession. Under no circumstances may the card be used by another individual.

Guidelines

Each employee using a Charter School procurement card shall sign a card usage agreement and receive training on applicable policies and procedures.

Procurement cards shall be used only for authorized Charter School purchases and shall not be used for personal purchases, or other use that is contrary to laws, regulations, or internal policies. The Charter School retains the authority to revoke any procurement card used for unauthorized or personal purposes.

Violations of this policy by an employee shall result in disciplinary action, in accordance with Board policy.

The established procedure for processing purchases by employees using procurement cards shall be as follows:

- a. Employee deals directly with the authorized vendor, for any disputed transactions including sales tax.
- b. Business office receives the consolidated invoice for payment.
- c. Cardholder verifies receipt of purchased items, reconciles the billing statement with purchases, attaches receipts, and signs as correct.
- d. Supervisor assigns appropriate account code, reviews the reconciled statement, and signs for approval, with receipts attached.
- e. Business office will conduct random audits of cardholder statements to justify purchases.

Purchases on his/her assigned procurement card by an individual employee shall not exceed the following:

- a. Single transaction dollar limit, \$4,000.00.
- b. Budget cycle limit established yearly.

The following list includes but is not limited to items authorized for purchase, without obtaining bids or quotes, by employees using procurement cards:

- a. Stationery, office supplies.
- b. Minor repair items.
- c. Computer equipment, parts, and accessories.
- d. Food for use in curriculum.
- e. Food and specialty items for cafeteria.
- f. Industrial arts supplies.
- g. Recurring utility bills.
- h. Sheet music.

Procurement cards shall not be used to circumvent the required bidding process.

Procurement cards shall not be used for purchases that could be anticipated at the beginning of the school year and would circumvent the required bidding process.

TO THE EXTENT THAT ANYTHING IN THIS POLICY COULD BE CONSTRUED TO CONFLICT WITH THE SCHOOL'S CHARTER OR APPLICABLE STATE AND/OR FEDERAL LAWS, THE APPLICABLE STATE AND/OR FEDERAL LAWS AND/OR CHARTER CONTROL.

ADOPTED this _____ day of _____, 2023

President

Secretary

Urban Pathways K-5 College Charter School

Board of Trustees Policy

PUBLIC CHARTER SCHOOL AUDIT POLICY

The Board of Trustees the (the “Board”) of the Urban Pathways K-5 College Charter School (“Charter School”) recognizes the importance of the right of the public to have access to the public records of the Charter School. This includes public financial records. The public has the right under law to inspect and procure copies of the annual audit conducted by the Charter School’s independent auditor and the audit conducted by the Commonwealth’s Auditor General’s Office.

The Board also recognizes its obligation to represent the best interests of all of its constituents. Therefore, the Board will make the results of both Charter School’s accountants’ audit and the Auditor General’s audit available to the public at Charter School.

The Board believes that the two (2) available audits – local and state– provide adequate safeguards for the public interest.

TO THE EXTENT THAT ANYTHING IN THIS POLICY COULD BE CONSTRUED TO CONFLICT WITH THE SCHOOL’S CHARTER OR APPLICABLE STATE AND/OR FEDERAL LAWS, THE APPLICABLE STATE AND/OR FEDERAL LAWS AND/OR CHARTER CONTROL.

ADOPTED this _____ day of _____, 2023

President

Secretary

Urban Pathways K-5 College Charter School

Board of Trustees Policy

PURCHASES BUDGETED POLICY

It is the policy of the Board of Trustees (the "Board") that when funds are available, all purchases contemplated within the current budget and not subject to bid be made in a manner that ensures the best interests of the Urban Pathways K-5 College Charter School ("Charter School").

All purchases that are within budgetary limits and were originally contemplated within the budget may be made upon authorization of the Chief Executive Officer ("CEO") unless the contemplated purchase is for more than \$5,000.00 in which case prior approval is required from the Board.

All purchase requests must be referred to the CEO or to his/her designee, who shall check as to whether the proposed purchase is subject to bid, whether sufficient funds exist in the budget, and whether the material might already be available.

There shall be a reasonable effort made to obtain, in writing, at least three quotations from independent sources for the supplies, equipment or services desired whenever possible.

Purchase requests shall be submitted on an approved requisition form. Upon the placement of a purchase order, the CEO's designee shall encumber the expenditure against a specific budget line item to guard against the creation of liabilities in excess of appropriations.

TO THE EXTENT THAT ANYTHING IN THIS POLICY COULD BE CONSTRUED TO CONFLICT WITH THE SCHOOL'S CHARTER OR APPLICABLE STATE AND/OR FEDERAL LAWS, THE APPLICABLE STATE AND/OR FEDERAL LAWS AND/OR CHARTER CONTROL.

ADOPTED this day _____ of _____, 2023

President

Secretary

Urban Pathways K-5 College Charter School

Board of Trustees Policy

Purchases Subject to Bid Policy

Purpose

It is the policy of the Board of Trustees ("Board") to advertise and obtain competitive bids for products and services where such bids are required by law or where such bids may be believed to bring about a cost saving to the Urban Pathways K-5 College Charter School ("Charter School").

The amounts contained in this policy regarding competitive bid and price quotation requirements are subject to adjustments based on the Consumer Price Index.

When seeking competitive bids, the Board shall advertise once a week for three (3) weeks in not less than two (2) newspapers of general circulation.

All construction, reconstruction, repairs, maintenance or work of any nature upon any school building or upon any school property or upon any building or portion of building, made by Charter School where the entire cost, value, or amount of such construction, reconstruction, repairs, maintenance or work, including labor and material is in excess of \$22,500.00, subject to adjustment under Section 120 of the Public School Code, shall be done under separate contracts to be entered into by Charter School with the lowest responsible bidder, under proper terms, after due public notice has been given asking for competitive bids.

Written or telephonic price quotations from at least three (3) qualified and responsible contractors shall be requested by the Board for all contracts that exceed \$12,200.00, subject to adjustment under Section 120 of the Public School Code, but are less than the amount requiring advertisement and competitive bidding, or, in lieu of price quotations, a memorandum shall be kept on file showing that fewer than three (3) qualified contractors exist in the market area within which it is practicable to obtain quotations. A written record shall be made of these quotations and shall contain the date of the quotation; name of contractor; contractor's representative; the construction, reconstruction, repair, maintenance or work of the quotation. The written price quotations, records or telephonic price quotations and memoranda shall be kept on file for a period of three (3) years.

Any construction, reconstruction, repairs or work of any nature, where the entire cost or value, including labor and material, is less than \$12,200.00, subject to adjustment under

Section 120 of the Public School Code, may be performed by Charter School's own maintenance personnel. The Board may authorize the Secretary of the Board or CEO to award contracts for construction, reconstruction, repairs or work of any nature, where the entire cost or value, including labor and materials, is \$22,500.00 or less, without soliciting competitive bids, subject, however, to the provisions set forth above in paragraph number 2.

As required by code, every contract for construction, reconstruction, alteration, repair, improvement or maintenance of public works shall comply with the provisions of the Act of March 3, 1978, known as the "Steel Procurement Act."

No person, consultant, firm or corporation contracting with Charter School for purposes of rendering personal or professional services to Charter School shall share with any Charter School Board member or employee, and no Charter School Board member or employee shall accept, any portion of the compensation or fees paid by Charter School for the contracted services provided to Charter School except under the following terms and conditions:

Full disclosure of all relevant information regarding the sharing of the compensation or fees shall be made to the Board.

The Board must approve the sharing of any fee or compensation for personal or professional services prior to the performance of said services.

No fee or compensation for personal or professional services may be shared except for work actually performed.

No shared fee or compensation for personal or professional services may be paid at a rate in excess of that commensurate for similar personal or professional services.

The Board prohibits the practice of splitting purchases to avoid advertising and bidding requirements.

Bid specifications shall be approved by the Board before being published.

The Public School Code requires Charter School to comply with the Pennsylvania Prevailing Wage Act. This Act requires every public entity to ensure that the prevailing wage rates are paid to workers employed on any construction, reconstruction, demolition, alteration, or repair work in excess of \$25,000.00. The prevailing wages, as determined by the Department of Labor and Industry, must be incorporated into the bidding specifications and the final contract for any work that falls under the Pennsylvania Prevailing Wage Act.

The Board recognizes that emergencies may occur when imminent danger exists to persons or property or the continuance of existing school classes is threatened, and time for bidding cannot be provided because of the need for immediate action in accordance with the Pennsylvania School Code. Such emergency must be declared by the Board and stated by resolution at an emergency meeting which does not require public notice pursuant to the Sunshine Act.

Whenever a contractor shall submit a bid for the performance of work and the contractor later claims a mistake, error or omission in preparing said bid, the contractor shall, before the bids are open, make known the fact and in such case the bid shall be returned unopened and the contractor may submit a revised bid proposal at the discretion of Charter School or the contractor may lose the right to bid if circumstances as determined by the Board require.

Bids shall be opened by the Board Secretary and/or an appointed Board Member at the next regularly scheduled Board Meeting after the closing date of the bids. The Board shall accept the bid of the lowest responsible bidder, kind, quality, and material being equal, but shall have the right to reject any and all bids, or select a single item from any bid.

There are exceptions to contracts or purchases which do not require advertising, bidding or price quotations and are set forth at 16 Pa.C.S.A. sec. 1802(h) and include but are not limited to professional service contracts involving professional expertise (i.e., medical, legal, architects, engineers, CPAs) and specifically those involving construction management services.

Electronic Bidding

The Board shall receive bids electronically for competitive contracts, except for construction and design services, in compliance with applicable laws and Board policy. The Charter School shall electronically maintain the confidentiality of the bid until the bid opening.

The Board shall adopt a resolution approving the use of competitive electronic auction bidding for contracts for supplies or services, but not for construction or design services.

An invitation for bids shall be issued and shall include:

1. Procurement description.
2. All contractual terms, when practical.
3. Conditions applicable to procurement, including a notice that bids will be received in an electronic auction manner. Public notice and advertisement of the

invitation for bids shall be given in the manner required for non-electronic bidding. Bids shall be accepted electronically at the time and in the manner designated in the invitation for bids. During the auction, bidders shall be able to review their bid rank or the low bid price, and may reduce their bid prices during the auction. At the conclusion of the auction, the record of the bid prices received and the name of each bidder shall be open to public inspection.

NOTE: The Department of Labor and Industry shall publish notice, in the Pennsylvania Bulletin prior to January 1 of each calendar year, of the annual percentage change and the unadjusted or final adjusted base amounts at which competitive bidding is required and written or telephonic price quotations are required, respectively, for the calendar year beginning the first day of January after publication of the notice. This policy will be adjusted annually based on the notice published in the Pennsylvania Bulletin.

TO THE EXTENT THAT ANYTHING IN THIS POLICY COULD BE CONSTRUED TO CONFLICT WITH APPLICABLE STATE AND/OR FEDERAL LAWS, THE APPLICABLE STATE AND/OR FEDERAL LAWS CONTROL. THIS POLICY IS NOT INTENDED TO CONFLICT WITH CHARTER REQUIREMENTS.

ADOPTED this _____ day of _____, 2023

President

Secretary

Urban Pathways K-5 College Charter School

Board of Trustees Policy

SPECIAL PURPOSE FUNDS POLICY

It is the purpose of this policy to establish financial supervision and controls for the administration of the various activities that involve the Urban Pathways K-5 College Charter School ("Charter School") Special Purpose Funds.

Special Purpose Funds are not part of the Charter School funds but shall be supervised by the Chief Executive Officer ("CEO"), approved by the Board of Trustees (the "Board"), and the CEO shall countersign all checks drawn upon them.

Such Special Purpose Funds may include any Charter School student body organization. Such funds may be deposited or invested in banks whose accounts are insured by FDIC and approved by the Board.

Funds collected by a Student Body Organization shall be turned in to the student organization's custodian of the fund or to the CEO before the end of each school day to be safeguarded until they are deposited as soon thereafter as possible.

The custodian of such funds shall furnish a bond in such amount and with surety as the Board may approve conditioned upon the faithful performance of the duties as custodian.

Records shall be maintained of the receipts and disbursements of all such funds in designated accounts according to the activity involved.

Disbursements from such funds shall be made by check only upon the request of the authorized advisor and the approval of the custodian of the fund.

All checks shall be signed by the person authorized to approve such disbursements.

All funds should be of an exchange nature and large balances should not be permitted to accumulate. Money should not be raised or collected unless there is a definite purpose for doing so and only the CEO may authorize the collection of monies by a student organization.

No funds shall be expended without the approval of the faculty advisor of the organizations, a student representative of the organization and the CEO.

A financial report of the condition of each Special Purpose Fund organization shall be submitted to the Board, no less than every other month.

TO THE EXTENT THAT ANYTHING IN THIS POLICY COULD BE CONSTRUED TO CONFLICT WITH THE SCHOOL'S CHARTER OR APPLICABLE STATE AND/OR FEDERAL LAWS, THE APPLICABLE STATE AND/OR FEDERAL LAWS AND/OR CHARTER CONTROL.

ADOPTED this day _____ of _____, 2023

President

Secretary

Urban Pathways K-5 College Charter School

Board of Trustees Policy

TRAVEL EXPENSE REIMBURSEMENT POLICY

To establish the policies and procedures governing the reimbursement of travel and other reasonable and proper expenses incurred by employees in the performance of official and necessary Urban Pathways K-5 College Charter School (“Charter School”) business.

To establish procedures for the reimbursement of travel expenses for necessary Charter School-related business and activities.

Authorization and Approval of Travel and Reimbursements

The Chief Executive Officer (“CEO”) or his/her designee(s) is responsible for authorizing travel on necessary and essential Charter School business and the subsequent approval of incurred expenditures. The intent of reimbursement is to defray those expenses the employee would not ordinarily have incurred had the employee not been on travel status.

Those designees considered agents of the CEO, and those designees alone, have the authority to approve expenditures for this purpose for their direct reports. It shall be their responsibility to see that their subordinates are familiar with these procedures and that their approval is obtained *before* such expenditures are incurred. An Administrator may not authorize his/her own travel or approve expenditures, but must obtain the approval of his/her supervisor.

All out-of-town travel for educational personnel must be approved by the CEO to ensure that the purpose is consistent with the Charter School’s educational goals and focus. Additionally, expenditures for all out-of-town travel require the prior approval of the CEO or his/her designee(s).

Expenditures in excess of the limitations established in these procedures will be approved only if fully documented and a review of the circumstances indicates that such expenditures are necessary and in the best interests of the Charter School. Approval of the CEO for review and written approval for reasons set forth here. Limited instances outside of established limitations set forth in these procedures when

necessitated by business circumstances are subject to *advance* written approval of the CEO for reasons other than those set forth here. The CEO may delegate approval to his/her designee for amounts under \$200.00.

Federal Grant Recipient Reimbursement

The Board of Trustees shall reimburse administrative, professional and support employees and school officials for travel costs incurred in the course of performing services related to official business as a federal grant recipient.

Conference Participation

Participation in any one conference will be limited to *two (2) participants* absent express written consent of the Board of Trustees.

The Charter School will reimburse employees, directly involved in educating students, for no more than up to two (2) conferences per fiscal year. For all non-instructional employees, the Charter School will reimburse for not more than up to one (1) conference per fiscal year.

For all employees, attendance at the conference must be essential to job performance. For instance, travel to participate in meetings of professional, civic, or social associations will only be approved if their content is deemed to be specifically aligned with and critical to job performance. Employees may attend additional conferences on their own time and at their expense.

To share helpful information, attendance at a conference by any employee, including an employee who has been invited to a conference as a presenter, is conditioned upon the employee providing a written report and, if requested by his/her supervisor, a presentation to colleagues regarding conference content within thirty (30) days after the conference.

Waiver of any or all of the limitations set forth above in Conference Participation may be granted only by the CEO.

Request for Reimbursement

Employees will be reimbursed for approved expenditures within the policies and limitations established herein. The "Charter School Travel Reimbursement Form" (hereinafter referred to as "Reimbursement Form"), properly executed and signed, will be used to request reimbursement for routine or out-of-state travel. Receipts for transportation, hotel accommodations, taxi fares, tolls, etc., must be obtained and

attached to the form. Reimbursement will be included in the employee's paycheck for a subsequent pay period.

All requests for reimbursement of travel expenses are subject to review by the Board of Trustees ("Board") to determine the official nature of the expenditure and the propriety and reasonableness of the charges. Expenditures not deemed necessary or reasonable will not be reimbursed.

Reimbursable Expenses

- **Routine Travel**

The Reimbursement Form should be submitted for reimbursement on a monthly basis.

- **By Automobile**

The shortest distance to the destination should generally be taken. Exceptions may be made when expressways or other highways are more convenient or require less time. Records must be kept of the distances between stops so that entries on the Reimbursement Form will be accurate. In listing trips on the Reimbursement Form, indicate the start destination (school/location) of each trip and the miles covered. Show the total reimbursable miles covered for the day in the prescribed block, rounding the total to the nearest mile. Attach a computer map showing the miles of the route. The Charter School's mileage reimbursement rate is the rate allowed by the Internal Revenue Service. Parking fees are reimbursable when parking at commercial parking areas is necessary. Parking fees are *not* reimbursable with respect to the regular or normal work location.

Mileage reimbursement will not be granted for the first stop of each workday or for the trip home from the last work location of the day. These two trips are equivalent to going to work and returning home after work each day and are not reimbursable. Mileage after the first stop through the last official stop of the day is reimbursable.

Travel mileage reimbursement will not be granted to employees who are eligible to earn overtime or compensatory time and who work on a non-scheduled workday, i.e., weekends, holidays, snow days or summer days for ten-month employees, etc.

Indicate on the Reimbursement Form each place visited via public transportation and the cost of each trip. Generally, the least expensive mode of travel should be used. Enter the total fares for the day in the amount column on the Reimbursement Form. The cost of travel to and from home and an employee's school or office is not an allowable expense.

- **Non-Routine Travel**

Travel within the states of Pennsylvania, Ohio, Maryland, and West Virginia, which does not include an overnight stay, and is less than 150 miles (*one-way*), is considered routine. The same guidelines established for routine travel as outlined above apply. Overnight stay is not permitted within the local Pennsylvania Region unless an exception is granted by the CEO or his/her designee(s).

- **Out-of-Town Travel**

Out-of-town travel includes any travel that is (a) over 150 miles (one-way), or (b) includes an overnight stay, or (c) is outside the states of Pennsylvania, Ohio, Maryland, or West Virginia. All out-of-town travel must be authorized *in advance* by the CEO or his/her designee(s), even where reimbursement of expenses is not being requested. The Reimbursement Form should be used for this purpose.

The authorizing administrator must be aware of the difference between the costs for automobile, train and air travel before approving a trip and authorize only that travel plan most advantageous to the Charter School. Car-pooling should be required by supervisors wherever possible.

Employees are required to forward a completed Reimbursement Form to the CEO or his/her designee.

Conference registration fees for conventions, professional or trade association meetings are reimbursable by use of the Reimbursement Form. Payment of registration fees must be documented by cancelled check, credit card receipt, or money order receipt.

Transportation to a terminal for the purpose of beginning a trip, transportation to and from the destination terminal, and transportation home from the terminal must always be made at the lowest possible cost. Public transportation, shuttle service, or private automobile, if less costly, must be used in preference to taxi service. Reasonable, long-term airport parking costs will be reimbursed.

Bridge and highway tolls incurred in official travel will be reimbursed when receipts are attached to the Reimbursement Form.

- **Meals While In Travel Status**

Meal allowance will be made for travel of over four (4) hours.

All meals while on travel status are reimbursable, without documentation, at the following rates (taxes and tips included):

A) **Meal Allowances:**

Breakfast:	\$5.00
Luncheon:	\$10.00
Dinner:	\$20.00
<i>Total Per Day:</i>	<u>\$35.00</u>

In order to qualify for meal allowances, an employee must be in a travel status during at least one half hour between the following time limits:

Breakfast:	7:30 am and 9:30 am
Luncheon:	11:30 am and 1:30 pm
Dinner:	5:30 pm and 7:00 pm

Meals that are part of an official function (conventions, etc.) will be reimbursed in the amount actually expended and should not be included in the meal allowance. A receipt must accompany the reimbursement request for such meals. Meals that are included in the registration fee may not be included in the request for meal allowance.

Other Expenses

Telephone costs in the conduct of official business are reimbursable. Personal calls home (for employees on out-of-town travel) are reimbursable up to \$5.00 per trip with receipts.

Valet expenses (dry cleaning, laundering) and other such personal expenses are not reimbursable.

Reasonable tips for carrying luggage *will be allowed of \$5.00 per stay.*

Use of a rental car is not reimbursable unless it can be shown that it was essential in the conduct of the official business and/or in the best interests of the Charter School. Approval for use of a rental car must be secured in advance of travel on the Reimbursement Form.

Upon conclusion of travel, and within ten (10) business days, a Reimbursement Form must be completed and signed by the CEO or his/her designee. Additional requests for travel will be denied to an employee who has not submitted a Reimbursement Form in a timely fashion.

Vacation Preceding/Following Travel

When an official period of travel is preceded or followed by an approved employee vacation or other non-work day, only such expenses that are an integral part of the official travel may be charged.

Transportation costs will be reimbursed up to the approved value of the roundtrip cost to and from the point of destination of the official travel.

CEO and Board Expense Reimbursements

The CEO is the only eligible employee authorized to use an executive credit card and/or debit card to incur reasonable and necessary expenses related to conducting official Charter School business in accordance with the reimbursement guidelines and the policies and procedures for utilization of the Charter School.

When traveling out-of-town on official Charter School business, charges for transportation and accommodations for the CEO can be charged directly to the executive credit card and/or debit card by the CEO and on the personal credit card of choice for Board Members.

Requests for payment of executive credit card expenses by the CEO must be submitted to the Board. All requests for payment require the credit card statement, original itemized receipt(s) of charges and an explanation of the business purpose(s). Request for reimbursement of expenses by Board Members must follow the same procedures.

Late fees will NOT be reimbursed by the Charter School, but will be the responsibility of the CEO and/or Board Member to pay using non- Charter School funds.

All requests for payment by the CEO must be reviewed and approved by the Board prior to being paid.

All requests for reimbursement of expenses by the Board must be reviewed and approved by the CEO or his/her designee.

All requests for credit card payment or reimbursement of expenses are subject to review by an internal audit service to determine the official nature of the expenditure and the propriety and reasonableness of the charges.

Policies and Procedures for Air Travel

Airline reservations will be booked by the employee at the lowest available coach rate requiring as few transfers as possible.

Many airlines offer substantially reduced fares when a Saturday evening stay-over is booked. Approval for early arrivals and extended stays at the expense of the Charter School will be granted if the employee can demonstrate that the additional cost for lodging and meals is more than offset by reduced airfares.

Paper tickets will not be issued. All tickets will be electronic, requiring the employee to present two forms of identification at the check-in. Employees will receive a printed itinerary prior to traveling. This itinerary and appropriate receipts must be submitted along with the properly completed Reimbursement Form.

An employee's frequent flier mileage account can be credited for official travel. Employees cannot reject a booking if the lowest available fare is with an airline other than that of which they are a frequent flier member.

Charges for change of flights will be the responsibility of the employee unless the change was in the interest of the Charter School and approved by the CEO or his/her designee prior to or after completion of travel.

Lodging will be booked at government rates *or at the lowest available rate if government rates are not available within a ½-mile radius* except as noted in below. Employees will be required to present identification and a credit card at the time of arrival. Reimbursement of room charges will be through the Reimbursement Form.

Regularly scheduled conferences and meetings usually provide for special lodging rates for participants. Employees should check to see if they can book lodging at the designated conference or meeting hotels at a price that is less than the conference or meeting rate. If a lower rate cannot be secured, the employee should book lodging through the conference or meeting facility.

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ADOPTED this day _____ of _____, 2023

President

Secretary