

# Washington State Charter School Program Grant Guidance

*Guidelines for the administration of Washington's federal Charter School Program (CSP) grant for 2019-20*

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# TABLE OF CONTENTS

WASHINGTON STATE CHARTER SCHOOLS PROGRAM 2019–20 GRANT CALENDAR.....	4
BACKGROUND .....	5
PURPOSE OF THE GRANT .....	6
LAWS AND REGULATIONS .....	7
ELIGIBLE APPLICANTS.....	8
New Charter School Application 2020-21 .....	9
Section 30 .....	10
Grant Award Process.....	10
Guidance.....	11
AVAILABLE FUNDS.....	12
Type of Subgrant Awards .....	12
DURATION OF GRANTS.....	13
REIMBURSEMENT OF FUNDS.....	14
USE OF FUNDS.....	15
CSP GRANT BUDGET INSTRUCTIONS .....	16
General Guidance and Restrictions (Attachment 35) .....	16
Valid Program Activities .....	21
Budget Creation .....	22
Expenditures .....	22
Revisions.....	23
Carry-Over .....	23
Review .....	24
PARTICIPATION, EVALUATION AND REPORTING .....	25
Lea Process.....	25
Technical Assistance .....	26
Risk Assessment .....	28
Evaluation.....	28
Reporting .....	29

WEIGHTED ENROLLMENT PREFERENCES (WEIGHTED LOTTERIES) AND ENROLLMENT POLICY ..	33
CSP SUBGRANT MONITORING AND MANAGEMENT .....	34
CSP Subgrant Monitoring .....	34
Conflicts of Interest .....	35
Misuse of Funds and Grant Termination .....	35
SUBGRANT GOALS .....	36
Academic Goals .....	36
Operational Goals .....	37
Financial Goals.....	38
Budget Narrative .....	38
STUDENT RECORDS AND LAWS .....	41
GRANT CLOSEOUT .....	42
Final Report .....	42
Spend Down Planning and Annual Financial Report .....	42
FISCAL CONTROLS.....	44
NO-COST EXTENSION.....	45
APPENDICES.....	46
Attachment 34.....	46
Final Report Full Template .....	55

# **WASHINGTON STATE CHARTER SCHOOL PROGRAM 2019–20 GRANT CALENDAR**

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October 1, 2019	Deadline	New CSP No-Cost Extension Year 1 Begins	8:00 am
October 1, 2019	Reminder	Grant Award Notification in EDS/iGrants	5:00 pm
October 15, 2019	Deadline	Quarter 4 Subgrant Progress Report for Existing CSP Schools	5:00 pm
Month of October 2019	Deadline	Quarterly Board Meeting Participation by CSP Coordinator	5:00 pm
November 6, 2019	Event	Board Training Event at OSPI in Olympia, WA	8:00 am
November 10, 2019	Deadline	Submission of first Monthly Progress Report for the No-Cost Extension Year	5:00 pm
December 15, 2019	Deadline	Year End CSP Progress Report Review Meeting	5:00 pm
January 10, 2020	Deadline	Quarterly Board Observations Reported	5:00 pm
April 30, 2020	Event	CSP School Site Visit	5:00 pm
September 1, 2020	Deadline	CSP Final Report Submission	5:00 pm
September 30, 2020	Deadline	Close out for CSP No-Cost Extension Year and final spend down for subgrants	5:00 pm

\*Dates, Times, locations and activities are subject to change.

\*\*Grant Calendar updates can be found on OSPI/CSP website

# BACKGROUND

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Authorized by Title V, Part B of the Elementary and Secondary Education Act (ESEA) (P.L. 107-110), the federal Charter Schools Program (CSP) provides funding to State Educational Agencies (SEA) with the purpose to increase national understanding of the charter school model and expand the number of high-quality charter schools available to students across the national by providing financial assistance for planning, program design, and initial implementation of new charter schools, and to evaluate the effects of charter schools, including their effects on students, student academic achievement, staff, and parents.

The Office of Superintendent of Public Instruction (OSPI) was awarded a competitive CSP grant under this federal program for \$6,973,743. In order to improve efficiency, OSPI's federally approved grant application proposed that the New Charter School Application for both the Washington State Charter Schools Commission (Commission) and approved school district authorizer will serve as the application for the CSP subgrants. This portion of the new Charter School Application was designed to minimize redundancies in application preparation as both the CSP and New School Application require similar information.

# PURPOSE OF GRANT

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**Objective 1:** Increase and sustain the number of new, high-quality charter schools in Washington State through sub-grants for planning, program design and implementation.

**Objective 2:** Increase the number of high-quality charter school seats by enhancing the capacity of charter school leaders and board members at new and existing charter schools.

**Objective 3:** Increase the quality of the state's charter school authorizer infrastructure through technical assistance, training, and access to necessary resources.

# LAWS AND REGULATIONS

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The CSP Grant is a federal grant that provides funding to SEAs with the purpose to increase the national understanding of charter school model and expand the number of high-quality charter schools available to students across the nation.

For additional detailed information, please review the following information on the [United States Department of Education CSP Laws and Guidance website](#).

# ELIGIBLE APPLICANTS

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All applicants must have been authorized by an authorized public chartering agency (Washington State Charter School Commission or Spokane Public Schools) in order to be eligible to receive Washington State CSP Grant Funds. Additionally, applicants must demonstrate that they meet the following federal definition of a public "charter school" in the ESEA (P.L. 107-110, Section 5210(1)):

- A. In accordance with a specific State statute authorizing the granting of charters to schools, is exempt from a significant State or local rules that inhibit the flexible operation and management of public schools, but not from any rules relating to the other requirements outlined in subsequent paragraphs below;
- B. Is created by a developer as a public school, or is adapted by a developer from an existing public school, and is operated under public supervision and direction;
- C. Operates in pursuit of a specific set of educational objectives determined by the school's developer and agreed by the authorized public chartering agency;
- D. Provides a program of elementary or secondary education, or both;
- E. Is nonsectarian in its programs, admissions policies, employment practices, and all other operations, and is not affiliated with a sectarian school or religious instruction;
- F. Does not charge tuition;
- G. Complies with the Age Discrimination Act of 1975, Title VI of the Civil Rights Act of 1964, Title IX of the Education Amendment of 1972, Section 504 of the Rehabilitation Act of 1973, Title II of the Americans with Disabilities Act of 1990, as amended and Part B of the Individuals with disabilities Education Act;
- H. Is a school to which parents choose to send their children, and that admits students on the basis of a lottery, if more students apply for admission than can be accommodated;
- I. Agrees to comply with the same federal and State audit requirements as do other elementary and secondary schools in the State, unless such requirements are specifically waived for the purpose of this program;
- J. Meets all applicable federal, State, and local health and safety requirements.
- K. Operates in accordance with State law; and
- L. Has a written performance contract with the authorized public chartering agency in the State that includes a description of how student performance will be measured pursuant to state assessments that are required of other schools and pursuant to any other assessments mutually agreeable to the authorized public chartering agency and the charter school.

The school must provide to OSPI the executed charter contract between the school and its authorizer to ensure that all relevant documents and practices comply with the federal definition and requirements of a charter school.

## **Eligibility Requirements**

To be eligible for a CSP grant, a charter school:

1. Must be considered a public charter school by federal definition (ESEA [P.L. 107-110, section 5210 (1)]).
2. Must be an authorized charter school in Washington (RCW 28A.710.020, RCW 28A.710.040)
3. Signed a Charter Contract.
4. Receive Local Education Agency (LEA) status.
5. Have your application, budget, and goals approved by OSPI CSP Management staff.
6. Have not previously received another type of CSP grant (school- or Charter Management Organization-based).

## **Verification prior to subgrant application approval**

Prior to final approval of a subgrant application, the CSP grant coordinator will verify with the US Department of Education that the applicant has not previously received a CSP grant.

## **New Charter School Application**

The New Charter School Application, including *Section 30: Optional School Planning and Implementation Subgrant*, is how a non-profit organization applies to become a charter school in Washington State. A school can apply to become a charter school through the Washington State Charter School Commission or a school district that is currently an approved authorizer of charter schools in Washington State. As stated above, in order to be considered for the CSP subgrant, a school must be considered a public charter school under federal law and be an authorized charter school in Washington.

CSP Management staff evaluates the entirety of the New School Application along with *Section 30*. The CSP subgrant is a competitive grant, which means that more schools will apply for this subgrant than the funds will allow to cover.

Links to documentation that includes the entirety of the New Charter School Application for 2020-2021 are in the forms section of this Guidance Document.

## **Section 30**

*Section 30* of the New Charter School Application must be completed by schools applying for a grant. In 1500 words or less, the applicant must:

1. Provide specific CSP subgrant goals and objectives (no more than 5). State goals and objectives clearly in terms of the measures or assessments the school plans to use to evaluate progress. All goals must be specific, measurable, action oriented, realistic, relevant, time-bound, and include targets. Goals may be similar or identical to the school's mission-specific goals, however, they must directly correspond to the proposed subgrant budget line items;
2. A description of how the subgrant funds will be used, including a description of how such funds will be used in conjunction with any other federal programs administered by the US Department of Education;
3. A description of how the charter school will continue operation once the federal grant has expired;
4. A description of the administrative relationship between the charter school and the authorized public chartering agency and the charter school and the CMO (if applicable).

In addition to the above requirements, applicants must provide the following for the purposes of *Section 30* of the application to initially apply for a one-time planning grant:

- Attachment 34, a signed CSP grant Statement of Assurances;
- Attachment 35, the OSPI Project Budget Form and Budget Narrative with a line item detail of proposed expenditures. Applicants are expected to read the General Budget Guidelines & Restrictions in order to prepare these documents (you will find this attachment under the CSP Budget Instructions Section).

## **Grant Award Process**

Following the review of each subgrant application and authorization process, including the execution of a charter contract, award notification e-mails will be sent to applicants informing them of their award status. The notification may include a request for additional information which must be provided within 30 days. Once the final review is completed, the OSPI CSP grant management staff will provide necessary fiscal documents and instructions on the reimbursement process for the grant. Funds must not be spent or encumbered until the grant has received final approval. The approximate award date is September 1 of each grant cycle year.

All goals and objectives stated in the application must be completed within the allowed budget period.

## **Guidance**

Washington's CSP management staff will provide technical assistance to those who have submitted a Notice of Intent and/or application related to the CSP subgrant application. This typically occurs through webinar trainings, in-person trainings, and e-mail communication around general questions related to the CSP subgrant. The purpose of this technical assistance is not intended to provide oversight or an early review of a school's application for authorization or the CSP subgrant. This technical assistance in the application stage is intended to help guide applicants with any confusion around the qualifications, regulations, laws, application timeline or process related to the CSP subgrant.

# AVAILABLE FUNDS

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The Washington SEA CSP grant offers two types of subgrant awards:

- a. One-year *planning and design* of the new charter school educational program subgrants; and
- b. Up to two-year *initial implementation* of the new charter school subgrants.

Washington CSP Sub-Grant Awards CSP Grant Period (2016-2019)				
Award Type	Planning and Design	Year 1 Implementation	Year 2 Implementation	Total Possible Funds Awarded per School
Amount	\$200,000 (1 year only)	\$305,000	\$280,000	\$785,000 (Not to exceed \$800,000)

# DURATION OF GRANTS

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The federal CSP program stipulates that not more than 36 consecutive fiscal months of funding be provided to any one subgrant, with not more than 24 months in the implementation phase. Therefore, Washington's CSP grant has been set up to be awarded over two or three sequential fiscal years.

The CSP grant is competitive. Schools that are already in operation will have their funds distributed over the two years of implementation. New schools applying after initial authorization will have their funds awarded evenly split over a three-year period, with the first year designated for planning and the subsequent years for implementation.

The CSP grants are renewed as a result of the renewal process and are based on the school's initial CSP grant awarded amount. The renewal process to continue grant funding is not competitive, but is subject to available federal funds, appropriateness of the renewal proposal concerning the grant budget, student enrollment, need, student academic achievement and progress made toward grant goals as outlined in the application. Continuation funding may be terminated if substantial progress is not being made to accomplish the grant project goals articulated in the initial CSP grant application or if the charter school fails to make satisfactory student academic progress. Failure to draw down funds in a regular and timely manner, fulfill technical assistance requirements, or meet enrollment projects by a significant amount may potentially disrupt funding. Regular communication regarding changes in plans, administration, or ability to fulfill the obligation of the grant is encouraged to identify early solutions.

OSPI's CSP grant expires on September 30, 2019. Continued funding beyond this date requires the approval of an annual "No Cost Extension" by the US Department of Education. OSPI intends to apply for and anticipates approval of this extension, but applicants should understand that continued funding of subgrants is dependent upon this approval.

# REIMBURSEMENT OF FUNDS

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The CSP subgrant is a reimbursement program, which means recipients will be reimbursed following proof of spending on allowable, approved activities. This occurs through a several-step process, including first obtaining the LEA Status and Grant Award Notification through OSPI's iGrants system, then by setting up a budget with a clear set of objectives and academic, financial, and governance goals that meet the allowable qualifications within the parameters of the CSP subgrant, and, finally through a monthly, quarterly and year-end progress report submission. You'll find detailed instructions of how this occurs in the CSP Grant Budget Instructions section within this Guidance Document.

It is important to emphasize the reimbursement requirement of the CSP subgrant. No funds will be allocated in advance of a purchase. All receipts are required as part of the evidence given with the Monthly Progress Reports. If the type of activity does not fall within the allowable activities category based upon the oversight of the evidence and explanation given, then the reimbursement of those funds through the use of the CSP subgrant will be denied.

# USE OF FUNDS

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Under the allowable activities described in the ESEA, Title V, Part B, Section 5204(f)(3), grant funds must be used for the following:

- A. Post-award planning and design of the educational program, including refining results (standards) and measurements (evaluation) of progress toward those results.
- B. Research-based professional development for teachers and other staff that includes National Staff Development standards (please review the forms section for links to these standards).
- C. Initial implementation of the charter school including:
  - i. Informing the community about the school,
  - ii. Acquiring necessary equipment and educational materials and supplies,
  - iii. Acquiring, developing or aligning curriculum, and
  - iv. Other initial operational costs that cannot be met from State or local sources.

Additionally, applicants are responsible for obtaining and reviewing the federal CSP Regulations and Guidance. Applicants are also responsible for being aware of the following relevant provisions: January 2014 CSP Non-Regulatory Guidance; 2 CFR Part 180; Non-procurement Debarment and Suspension as adopted at 2 CFR Part 3485; Uniform Administrative Requirements, Cost Principles and Audit Requirements for Federal Awards under 2 CFR Part 200 as adopted at 2 CFR Part 3474 (BLOCK 8); and 34 CFR Parts 75, 77, 79, 81, 82, 84, 86, 97, 98, 99 (Education Department General Administrative Regulations, EDGAR).

The usage of funds for the CSP subgrant are applicable strictly to the fulfillment of the Planning and Design, Year 1 Implementation and Year 2 Implementation causes for the approved Charter School recipients. The use of these reimbursement funds for any other purpose is strictly prohibited and the violation of this may be subject to the loss of the subgrant and the disapproval of any additional funding.

# CSP GRANT BUDGET INSTRUCTIONS

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## General Guidance and Restrictions (Attachment 35)

The following CSP Grant Budget Instructions provides an outline of the steps that are to be taken to successfully implement the CSP subgrant budget.

The OSPI's CSP Grant management staff works closely with the schools—typically the school founder, school leader or CFO—in maintaining the budget implementation and management from month-to-month and year-to-year. CSP management staff and the school staff will also work closely with OSPI's general Grants Management team and IT Grants staff to accomplish the submission of online application, budgets, e-mails, and the like. OSPI staff who have access to and expertise in agency technology systems and programs work with and advise the CSP Grant management staff and the school personnel.

The various requirements and restrictions that occur within the CSP subgrant budget instructions include access to technology, what is and is not allowable under the various line item amounts, as well as activities for the CSP subgrant reimbursement. You'll find these requirements in Attachment 35, the OSPI Project Budget Form and Budget Narrative, which provides more specific instructions. (The maintenance management of the budget is described more thoroughly in the Preparation, Evaluation and Reporting section of this Guidance Document.)

## **Attachment 35, General Budget Guidelines and Restrictions**

*Please note that the Project Budget Form has lines for activities that are not allowed under the terms of the subgrant. Please follow the guidance provided to ensure that funds are used for approved activities as specified by the "uses of Funds" outlined in Section 30 and the information provided below.*

- Any single line item more than \$1,000 should have a detailed justification. Break down line items exceeding \$1,000 through notations of quantity, explanation or additional line items to clarify how funding will be expended.
- Performance Management and Professional Development requests must include sufficient detail to include number of participants, number of days, cost per person per day, topic, and provider.
- It is in the best interest of the subgrant applicant to request only reasonable funding levels in order to maximize the total award. Budget line items that are unrealistic will be cut or trimmed. For example, if \$8,000 is requested to send 6 individuals to a national conference, you may be asked to instead send 2 people each year over a three-year period.
- Salaries/benefits are eligible under the subgrant if the duties being performed are related to allowable activities:
  - Planning Subgrant
    - Post-award planning and design of the educational program, including refining results (standards) and measurements (evaluation) of progress toward those results.
    - Research-based professional development for teachers and other staff that includes National Staff Development standards.
    -
  - Implementation Subgrant
    - Informing the community about the school,
    - Acquiring necessary equipment and educational materials and supplies,
    - Acquiring, developing or aligning curriculum, and
    - Other initial operational costs that cannot be met from State or local sources.
- If an applicant chooses to use subgrant award to fund salaries/benefits, the applicant must submit information that includes name, title, a list of activities funded by the grant, percentage of time per week and length of time grant funding will be used to cover the salary. **Time and effort documentation is required for all personnel compensated with federal funds (see OMB A87 Attachment B(8)(h)).**

## **Attachment 35, General Budget Guidelines and Restrictions**

- Recurring costs are expected to gradually shift to the operating budget for years 2 & 3. Due to scale-up this might not always be possible, and so routine costs will only be allowed in years 2 & 3 for expenditure associated for newly added cohorts/grades/classrooms. Schools that are unable to cover all or part of recurring costs for years 2 & 3 with their operating budget can include the gap expense in their CSP budget, but this requires an explanation in the line item narrative and certification by the school that these costs cannot be covered by years 2 & 3 operating budgets.
- Site licenses for software are considered a recurring, operational cost and will not be allowed in year three of the award.
- Curriculum alignment expenditures are only allowed for initial training prior to the implementing of a new curriculum or existing curriculum for a new grade level.

The following items **CANNOT** be funded and should therefore not be requested:

- Activities
  - Field trips
  - Extracurricular activities, programs, etc.
  - Athletic (team/afterschool) equipment
  - Expenses outside the scope of the school's charter or K-12 education; i.e., before/after school programs and preschool
- Apparel
  - Student uniforms
  - Athletic & extracurricular uniforms and costumes
  - Staff uniforms
- Capital Improvements
  - Addition of permanent structural improvement or restoration of some aspect of a property that will either enhance the property's overall value or increase its useful life
- Construction
  - Construction of new facility
  - Construction on existing facility
  - Building renovations, refurbishments, and restoration
  - Activities for which an architect and/or engineer must be utilized
- Supplies
  - Cleaning supplies
  - Cafeteria/food service supplies
- Food
  - Food
  - Beverages
  - Equipment and supplies used exclusively for the service of food/beverages (cafeteria equipment)

## **Attachment 35, General Budget Guidelines and Restrictions**

- Incentives
  - Gift certificates
  - Food
  - Alcoholic beverages
  - Awards and gifts
- Lobbying
  - Lobbying or related expenses
- Promotional items
  - Non-educational/non-informative promotional/novelty item promotional materials (often imprinted), such as pencils, pens, balloons and notepads.
  - PROMOTIONAL ITEMS ARE NOT ALLOWABLE UNDER ANY CATEGORY, INCLUDING OUTREACH AND RECRUITMENT
- Professional Fees
  - Accounting, auditing and legal fees not related to organizational start-up and planning
  - Grant oversight
  - Professional fees or membership dues
- Recruitment
  - Placement fees (employment advertising okay)
  - Travel for prospective employees
- Recurring Expenses
  - Rent/leases on or after first day of school (*ONLY allowable under the Implementation subgrant and ONLY up to 3 months prior to the school opening*).
  - Operating expenses and utilities, equipment leases, monthly and annual contracts
  - Recurrent/repeated professional development and training
  - Software license renewals
  - Fees such as monthly insurance and payroll services, management company fees, service contracts, trash disposal, gas/electric/phone/water/utilities, cell phones, etc.
- Renovations
  - Structural (roofing, wall repair, electrical wiring/rewiring)
  - Room additions
  - Fixed partitions
  - Security (fences, alarms, cameras)
  - Painting
  - Carpeting
  - Landscaping
  - ADA compliance

## **Attachment 35, General Budget Guidelines and Restrictions**

- Salaries
  - See *allowable salary specifications listed above.*
  - Costs of continuing education credits for professional development coursework completed at a college or university, as this would be considered compensation.
- Student
  - Student membership fees
  - Student conferences
- Technology
  - No electrical installation or modification to room dividers or existing walls, floors, ceilings, or structural elements.
  - Installation of computer network cabling is only allowable when not already present and may not comprise a capital improvement to the property
- Travel
  - Travel costs must comply with the State of Washington's Office of Fiscal Management travel guidelines outlined in the [State Administrative and Accounting Manual Chapter 10](#)

## **Valid Program Activities**

There are specific Valid Program Activities that fall within the budgetary allowable categories within the Planning and Design, Year 1 Implementation and Year 2 Implementation. Please review Attachment 35 to make sure that the allowable costs match with the Valid Program Activity Categories. *Not all activities are applicable to all three years of the subgrant.*

21 - Supervision

22 - Learning Resources

23 - Principal's Office

24 - Guidance and Counseling

25 - Pupil Management and Safety

26 - Health Related Services

27 - Teaching

28 - Extracurricular

29 - Payments to School Districts

31 - Instructional Professional Development

32 - Instructional Technology

33 - Curriculum

62 - Grounds Maintenance

63 - Operation of Buildings

64 - Maintenance

65 - Utilities

68 - Insurance

91 - Public Activities

## Budget Creation

The CSP subgrant budget creation occurs in conjunction with the final application process in the EDS/iGrants system. The Grant Award Notification (GAN) is then provided once the application and budget has been reviewed as part of the form package process and there has been final approval of the CSP grant coordinator. There are several steps that occur that help to set up the technology requirements so that the CSP subgrant budget can be developed and created within the EDS/iGrants system, which is the main system used for all grants connected to Washington State Public Schools.

The CSP subgrant budget creation will occur in the month of September. Following the Attachment 35 instructions and Valid Program Activities outline, a Budget will be entered into the EDS/iGrants system that contains a "Contact" section, a "Budget" section, an "approval" section and a "Notes" section.

In order to complete this process for review and approval, the applicant will need to follow step-by-step instructions within the Planning, Evaluation and Reporting section of this Guidance Document. (Additional communication with the CSP management staff and OSPI General Grants Management and IT Grants staff will also be available via e-mail and phone). Official approval must take place before any CSP subgrant funds may be spent on approved activities

The budget outline form, as well as the link access to the EDS/iGrants system, can be found under the Forms section within this Guidance Document. Additional information is also provided within the Technical Assistance and Planning, Evaluation and Reporting section of this Guidance Document.

## Expenditures

With the CSP subgrant budget creation, the school will need to be mindful of the overall budget sections that fall within either the Planning and Design criteria or the Year 1 and Year 2 Implementation criteria and the Valid Program Activities within the EDS/iGrants system and how these will impact the expenditures that are submitted on a monthly basis for reimbursement. This information shapes the direction of the school's CSP subgrant budget for the year and the types of activities that are directly correlated to the purpose of the CSP subgrant.

Technical assistance and step-by-step instructions for implementing these expenditures (including the Monthly Expenditure Report) are found within the Planning, Evaluation and Reporting section of this Guidance Document.

## **Revisions**

Revision to the school's CSP subgrant budget are possible and can occur throughout the year in which you are designated for that particular portion of the subgrant (Planning and Design, Year 1 Implementation, Year 2 Implementation). After your CSP subgrant budget has been created and approved, a request can be made within the EDS/iGrants system for a Budget Revision. This request should be prefaced with written communication to the OSPI CSP grant management staff members prior to this request. Once the request is made with the changes to the expenditures within the budget, then an e-mail notification will be automatically sent to the OSPI CSP grant management staff and a review process will take place, with the conclusion requiring either an adjustment by the CSP subgrant recipient or approval of the revision. It is important to note that a revision should not exceed the originally approved CSP subgrant budget for that particular year.

## **Carry-Over**

A carry-over amount is permitted from the Year 1 Implementation to the Year 2 implementation CSP subgrant budget. The amount of the carry-over should not exceed more than 10% of your allowable amount of CSP subgrant funds given within the Year 1 implementation. Carry-over funds are not permitted from the Planning and Design year to the Year 1 Implementation year due to the differentiated purposes of each one of those years in the subgrant cycle. Additionally, although funds can be carried over from the Year 1 Implementation funds to the Year 2 Implementation funds, the expectation is that in the Year 2 implementation, all funds—including the carry-over funds—are to be spent down accordingly and in a timely fashion.

Within the CSP subgrant budget process, carry-over is a similar process to that of setting up an original budget with a revision in the EDS/iGrants system. There is a space within the system that identifies a carry-over amount. This amount, once agreed upon with the OSPI CSP's Grant management staff, can be added as an additional amount of funds for the budget and expenditure purposes for the Year 2 implementation. In order to systematically add this amount into your budget within the EDS/iGrants budget system, a revised budget may be necessary after an initial approval for Year 2 implementation funds.

Technical Assistance is provided within the Planning, Evaluation and Reporting section of this Guidance Document.

## **Review**

A budget review will take place initially within the EDS/iGrants system by the OSPI CSP grant management staff once a budget has been submitted for the CSP subgrant. Additional reviews take place for revisions to the budget or if a revision that includes carry-over funds is necessary. This budget review process includes reviewing the contact information provided, the outline of the allowable activities and comments for the use of those funds within those activities and any additional "needs work" elements that need to be addressed by the CSP subgrant fund financial representative themselves.

CSP subgrant reviews occur in the months of either September/October for each year in which the CSP school is within the CSP subgrant award cycle (the Planning and Design/Year1 Implementation/Year 2 Implementation).

Reviews include notes within the EDS/iGrants system related to the GAN and any additional work needed to the CSP subgrant budget. Additionally, reviews include the OSPI Grant and IT iGrants staff.

# PARTICIPATION, EVALUATION AND REPORTING

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The process of the CSP subgrant is centered around the participation, evaluation and reporting inclusion of the CSP management team, the CSP subgrant school representative and active participants that make up the board, school leadership team, OSPI IT team, etc. This section of the Guidance Document provides detailed instruction on various elements within the participation, evaluation and reporting of the CSP subgrant and the requirements that are necessary for all individuals involved within this three-year subgrant process.

This section is divided into five categories, including the LEA Process, Technical Assistance, Risk Assessment, Evaluation and Reporting. Additional communication regarding the five categories will be provided to subgrantees through e-mail, phone calls, monthly, quarterly, and yearly progress reports, board meetings and various other trainings. These categories outline the flow of work that is required for the school's active participation, evaluation and reporting of specific CSP subgrant requirements and who each recipient will be working with to complete all of these categories. Individual circumstances and new situations may cause the information within this Guidance Document to be altered depending upon the requirements of RCWs and WACs.

## LEA Process

One component of the CSP subgrant includes the LEA process which is required in association with becoming an authorized charter school in Washington State and for the technology component for the CSP subgrant. LEA stands for Local Educational Agency and is an entity with the authority and responsibility to operate public schools. In Washington State, charter schools are classified as their own individual LEA, even if they are authorized by an approved school district. All authorized charter schools in Washington State are provided an LEA status and number, which affect how charter schools receive federal, state and local funds for regular and special education purposes.

For the CSP subgrant, the subgrantee will need to submit LEA paperwork to OSPI in order to get an assigned LEA ID code with the OSPI IT team. Information on how to do that can be found in the [Enrollment Handbook](#). The assigned LEA ID code is a required part of submitting the CSP subgrant application and budget into the [Education Data System](#) (and iGrants system).

# **Technical Assistance**

OSPI places great value on providing high-quality support and training based upon research-proven best practices that are intentionally designed to improve each school's chance for success. This is why participation in technical assistance events is expected of grant recipients.

All subgrantees agree to participate in Technical Assistance (TA) and Professional Development (PD) as a condition of the CSP subgrant award. The goal of this training is to support subgrantees as they implement and manage their subgrant to ensure compliance with the terms set forth in the Section 30 and New Charter School Application. Trainings may be provided in conjunction with other TA and PD provided by OSPI or charter school authorizers as part of the school's pre-opening conditions, on-boarding process, or ongoing compliance with a charter contract. Additional subgrant training may be required.

Training topics may include operational process, board and staff development, subgrant compliance, data systems, and reporting requirements. Notifications will be sent out in advance and every effort will be made to accommodate the subgrantee's availability. Application for subgrant funds indicates acknowledgement and consent to these requirements.

There is additional information on Technical Assistance within the Grant Budget Section and Participation, Evaluation and Reporting section of this Guidance Document.

Specific information is provided below in regards to the technical assistance that is provided to CSP subgrant recipients for each of the three years of the CSP grant cycle.

## **CSP application support**

As a new school applicant prepares to submit its application for the CSP subgrant, the CSP grant coordinator provides a webinar training 3 months prior to the submission of the application. This webinar training outlines through a PowerPoint the process by which one applies to the CSP subgrant and integrates the CSP subgrant elements into the overall New School Application. These elements include the history of the CSP Grant, Washington CSP Grant Award and Management, eligibility, subgrant type and uses of funds, application and review, award timeline, and oversight and monitoring. During this training session, opportunities to ask questions will be provided, as well as follow up phone calls and e-mail support to the webinar for any necessary clarification.

## **New school and subgrantee support**

When New School CSP subgrantees are awarded, monthly webinar trainings are provided throughout the summer to provide guidance to submitting the Monthly Progress Report, submissions for reimbursement and technical assistance with the EDS and iGrants system. This

technical assistance helps to prepare the newly awarded subgrantee with skills to submit budget and progress report information to the CSP coordinator and work within OSPI's grant system and with the grant management staff to create the subgrantee's application and budget within the iGrants system and make any revised changes for approval.

### **CSP Website: Handbook and Modules**

The [OSPI/CSPGrant](#) website has been developed to support continued technical assistance for the CSP subgrantees. This website includes a handbook and specific web-based video modules—including various topics on board governance, New Charter School Application, Diversity/Equity/Inclusion, Professional Development, Charter Contract, Oversight and Responsibilities and Special Education—that help to give guidance, technical assistance and professional development for new CSP grant applicants and subgrtees. Additional information provided includes important technical links to OSPI and United States Department of Education documentation and trainings that are useful for the CSP subgrantees.

### **CSP communication**

The CSP grant coordinator will make every effort to support continued technical assistance through communication with the subgrantees throughout the CSP planning year, Year 1 implementation and Year 2 implementation grant cycles. This support will include e-mails, phone calls, Zoom conference meetings, and the like. The subgrantee can request technical assistance on a one-on-one basis with the CSP grant coordinator at any time.

### **Charter school support site visit**

The Charter School Support Site Visit is an evaluation process that occurs within Year 2 implementation of the grant cycle for schools that are working towards concluding their CSP subgrant. The Support Site Visit provides an opportunity for a comprehensive evaluation based upon the outlined requirements of the CSP grant. The purpose of engaging in this process is to set a course for sustainability for the school post-CSP grant. The CSP begins with a one-day site visit, after which the school receives a detailed report based upon a CSP site visit developed rubric, with recommendations for research-based steps to improve school performance.

### **Governing board support**

Effective leadership is the most important determinant for success for any enterprise, but this is especially true with charter schools where success hinges on the daily leadership capabilities of the administrator and the strategic direction provided by the governing board. Even before the school doors open, board members must begin building a strong foundation that will support the school through the trials of the start-up years and as the school grows and strives to meet its potential. To build a strong foundation, school boards must be effective in promoting the

school's vision and mission, planning for the future, setting sound policy, modeling professionalism, overseeing finances and evaluation, selecting and managing the school leader, and building relationships. Thus, the CSP board training options focus on building, strengthening, and sustaining these capabilities within charter school governing boards.

### **Board fundamentals**

OSPI, through a contract with the National Charter Schools Institute, provides free board fundamentals training in-person training days twice a year, as well as website modules and handbook training to:

- Support new board members by providing a sound introduction to board practice and responsibilities;
- Provide a refresher to continuing board members that are in leadership roles; and
- Introduce school leaders to general charter school governing board roles, practices and responsibilities.

## **Risk Assessment**

Under federal law, OSPI is required to assess subgrantees and their applications to identify potential fiscal and programmatic risks which may result in increased reporting, monitoring, additional technical assistance, corrective action, and/or grant suspension or termination. This assessment is primarily performed during monthly, quarterly and year-end evaluations with the subgrantee and during the Year 2 Support Site Visit.

Award amounts may be withheld if subgrantees do not adhere to their grant requirements, including whether projected enrollment is not met, technical assistance requirements are not met each year, funds are not spent in a timely manner and reporting is not completed. In order for programs to exit the program in good standing, it is imperative that subgrantees comply with all requirements of the program.

## **Evaluation**

As a condition of the federal grant, OSPI is responsible for evaluating subgrantees to ensure they adhere to federal requirements and accomplish their performance goals. This monitoring system reviews charter schools each year.

### **Planning Year**

A year-end review is conducted through a Zoom Conference call to ensure there is a signed contract and waivers on file, technical assistance is completed, grant award spending is timely and all audit reporting have been completed.

## **Year 1 Implementation**

A year-end review is conducted through a Zoom Conference call to ensure that all indicators towards progress of grant objectives through the Year End Progress Report are in alignment, spending is being conducted according to the budget and carry-over budget amounts are in alignment, and that educational programming, enrollment procedures, receipts of other federal funding and compliance with other federal regulations are being fulfilled (including the completion of the fulfillment of technical assistance, the review of staff employment, and all audit reporting).

## **Year 2 Implementation**

A Charter School Support Site Visit is conducted over a one-day visit of the charter school. This site visit is to further evaluate and monitor for quality assurance. This comprehensive review looks at academic performance, learning environment, organizational effectiveness, governance and quality leadership through the CSP grant lens. The review is conducted by the CSP grant coordinator. The school is provided with a final written report that includes suggestions for short- and long-term school improvements as it relates to the CSP subgrant and the post-exit of this grant. The CSP Support Site Visit is a requirement of the CSP grant program. More information can be found in the technical assistance of this guidance document.

# **Reporting**

The CSP subgrantees are responsible for submitting report regarding CSP activity on a monthly, quarterly and yearly basis. A monthly, quarterly and year-end spreadsheet has been developed by grant management staff for monitoring purposes of the CSP subgrantee.

### *Monthly Progress Report*

On a monthly basis, the subgrantee will submit a Monthly Progress Report that includes up-to-date demographic information, the monthly expenditure report and monthly project updates (which include specific questions related to oversight of the CSP subgrant). Along with this monthly progress report, the subgrantee will supply all receipts associated with the monthly expenditure report for all costs to be evaluated for reimbursed. (Salary evidence does not have to be provided unless requested by the CSP grant coordinator). The evaluation of the Monthly Progress Report will be done through e-mail communication unless further clarification is necessary and requires a phone conversation.

### **Monthly Expenditure Report**

One of the centerpieces of the CSP subgrant budget reporting is the list of expenditures that are a part of the reimbursement process for the subgrant funds. The expenditures occur when the

subgrantee purchases an item, professional development, or salary for the Planning and Design, Year 1 Implementation or Year 2 Implementation that fits within the allowable activities for the CSP subgrant. Once the allowable activity has been paid for, subgrantees may then submit for reimbursement expenditure through the monthly expenditure report.

The monthly expenditure report is a subset portion of your Monthly Progress Report that is submitted to the OSPI CSP management staff by the 10<sup>th</sup> of each month in which you are a CSP subgrant recipient. All expenditure items must also include the receipt (evidence) for the purchase to be considered for reimbursement. The CSP grant coordinator generally has up to five days to ask clarifying questions and approve the amount submitted within the monthly report (this may vary, if some items are not allowable). Once the subgrantee has received e-mail confirmation from the OSPI grant coordinator, the school may move forward within EDS/iGrants to submit the appropriate reimbursed amount. Expenditure reports are also subject to further conversation based upon questions and answers received during the quarterly review meetings and year-end meetings with the OSPI grant coordinator.

In Washington State, CSP grant management staff uses an Excel spreadsheet attachment for the monthly progress reports and monthly expenditure reports. Here is a visual representation of the monthly expenditure report documentation, followed in italics by a notation that accompanies the monthly expenditure report:

Object Code	Activity Code	Vendor	Description	Quantity Ordered	Payment Date	Check Number or Payment ID	Invoice Date(s)	Invoice Number	Total CSP Budget Amount For this Activity	Documentation Provided	Office use Expenditure Approved

*\*Monthly Progress Reports are due on the 10th of the following month. If the 10th falls on a weekend, they are due the Friday before. This allows the CSP Grant Coordinator to approve your expenditures so that you may submit them in EDS by the 15th and receive payment by the end of the month. If you submit your Monthly Progress Report after the 10th, the CSP Coordinator does not guarantee that approval will be granted in time to submit to EDS for timely reimbursement.*

*The CSP Grant Coordinator will notify you via e-mail as to the status of your monthly expenditure approval. You may not submit a request for reimbursement through EDS without first obtaining approval.*

*\*Expenditures will NOT be approved unless adequate documentation is submitted. Receipts and invoices must include the date of purchase, the quantity of items purchased, the vendor name, the unit cost, and the total cost. The CSP subgrant is a reimbursement grant. Documentation must indicate that items have been officially purchased or that payment has been made. In the case of personnel time, please provide documentation to show that corresponding budgets have been charged.*

*\*Time and effort documentation is not required each month; however, you must keep up-to-date records onsite for audit purposes. If you are reporting personnel time, please include the number of hours and the rate per hour (if applicable) in the expenditure description column. Please provide a brief description of personnel activities on the Monthly Project Update tab.*

*2 CFR PART 200 Uniformed Guidance: §200.302 Financial Management (b) system of each non-Federal entity must provide for the following:*

*(2) Accurate, current, and complete disclosure of the financial results of each Federal award or program in accordance with the reporting requirements set forth in 200.327 Financial reporting and 200.328 Monitoring and reporting program performance.*

*(3) Records that identify adequately the source and application of funds for federally-funded activities. These records must contain information pertaining to Federal awards, authorizations, obligations, unobligated balances, assets, expenditures, income and interest and be supported by source documentation.*

### **Quarterly Progress Reports**

Quarterly Progress Reports occur four times a year with the subgrantee and the CSP grant coordinator. The quarterly progress reports include a one-hour phone conversation to evaluate the Quarterly Project Update section of the progress report. This phone call also provides the opportunity to have any further conversations regarding demographic information provided or the timely draw down of funds.

### **Year-End Progress Report**

The year-end progress report occurs once a year with the subgrantee and the CSP grant coordinator. The year-end progress report includes specific questions in regards to the year-end project update questionnaire. This is conducted via a Zoom conference. Specific demographic, budgetary and academic assessment and oversight is conducted. In addition to

reviewing the prior year, the report provides an opportunity to evaluate the steps being taken for future use of CSP subgrant funds and the successful drawdown of those funds.

### **Final Grant Report**

A final grant report is due to OSPI within 90 days of the end of the Year 2 implementation. The final report should include the following:

- Executive Summary (not to exceed 1 page);
- Report on each grant project goal, including a summary on the progress made on each goal and objective;
- A report on the academic achievement and growth of the school, including a copy of the school's academic framework report;
- Financial narrative report on how the grant was expended over the course of the grant cycle;
- Final expenditure report that details 100% of awarded grant funds, including an inventory of all equipment and non-consumable goods purchased with CSP grant funds according to Education Department General Administrative Regulations (EDGAR) 80.32, 74.34.

*Note:* Completion of all of all CSP requirements are necessary to exit the program in good standing.

### **Change of Status**

Charter schools should report to OSPI any change in the charter status of their school. The continuation of CSP subgrant funds will be at risk with any change of status of the school. Additionally, schools that are not in good standing with their authorizer or on a corrective action plan may also be at risk to lose future subgrant funds.

### **Assurances for Financial Accreditation**

Charter schools are required to comply with all state financial and budget rules, regulations and financial reporting requirements with which each charter school is required to comply, including but not limited to two annual completion of a government audit. These audits include an independent financial audit and a compatibility audit by the State Auditor's Office (SAO).

# **WEIGHTED ENROLLMENT PREFERENCES (WEIGHTED LOTTERIES) AND ENROLLMENT POLICY**

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The enrollment policy of a charter school receiving CSP grant funds must include a lottery (random selection) process if more students apply for admission to the charter school than can be admitted. All eligible applicants for admission must be included in the lottery process, with the exception of siblings of students already enrolled in the charter school when provided for in the charter school's lottery policy. Once a student has been admitted to the charter school through an appropriate process, the student may remain in attendance through subsequent grades. Further, enrollment policies must include an open enrollment period that is advertised within the school's community so that all interested students have an equal opportunity to enroll in the school. More detailed information on lottery and enrollment requirements can be found in the [January 2014 CSP Non-regulatory Guidance](#).

In the event that a subgrant applicant plans to use or establish weighted lottery preferences (also known as weighed lottery) during their funding cycle, the school must submit a proposal, in advance, that is consistent with state and federal regulations, and receive approval by their authorizer, the Commission, the US Department of Education and the OSPI grant management staff in order to maintain eligibility for a subgrant award or renewal. Failure to comply with this requirement may result in the loss or non-renewal of this subgrant.

Please note that RCW 28A.710.050(3) requires that weighted enrollment preferences must be approved by the Commission regardless of the school's authorizer:

*If capacity is insufficient to enroll all students who apply to the charter school, the charter school must grant an enrollment preference to siblings of enrolled students, with any remaining enrollments allocated through a lottery. A charter school may offer, pursuant to an admissions policy approved the Commission, a weighted enrollment preference for at-risk students or to children of full-time employees of the school if the employee's children live within Washington State.*

# CSP SUBGRANT MONITORING AND MANAGEMENT

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## CSP Subgrant Monitoring

OSPI is committed to providing rigorous fiscal and programmatic monitoring of schools to ensure the proper use of public funds. Adherence to following the monitoring and compliance activities cannot be overstated. Failure to fulfill the requirements may lead to the denial of reimbursement of funds or rejection of continued funding of the subgrant.

***The OSPI grants management staff provides monitoring of CSP subgrant recipients. This process includes but is not limited to the following:***

- The grant management staff reviews and approves each subgrant budget within iGrants prior to the release of the funds.
- Monthly and Quarterly Progress Report submissions that include expenditure documentation, recipients' progress toward grants project goals and objectives, and authorizer oversight including any concerns or corrective action.
- Mid-year fiscal Desk Review protocols may include review of recipient's expenditure documentation and requests, inventory, amounts reported (allocations, cash receipts, monthly and total expenditures, and current accruals and obligations), and financial transparency compliance.
- Timely drawdown of subgrant funds is monitored on a quarterly basis at a minimum.
- Budget Revisions are reviewed and approved through iGrants.
- School Finance and Operations are reviewed as part of the Year 2 implementation Site Visit.
- Grant management concerns and any corrective action required are reported to the recipient's fiscal manager and authorizer.

***Elements of OSPI's programmatic management include:***

- A year-end progress report after every year of the CSP subgrant award year. The progress report describes the recipient's progress toward its subgrant project goals and objectives, reporting on subgrant expenditures, and school operations.
- A Site Visit by the OSPI CSP grants management staff to review progress toward its subgrant project goals, observe the educational program, confirm statutory compliance, discuss eligibility for and receipt of federal funds/programs, provide awareness of CSP grant requirements, certifications and assurances.
- Review of charter documents and performance data.
- Any complaints, concerns or findings brought to the attention of either charter authorizer or OSPI are investigated by OSPI and reported to the recipients and the authorizer, along with any technical assistance and corrective action requirement.
- The Final CSP Subgrant Report is a programmatic monitoring element. The report includes the final reporting of expenditures, EDGAR compliant asset inventory, and progress toward Grant Project Goals and project objectives, including educational outcomes.

## **Conflicts of Interest**

As a nonprofit and an entity receiving public funds, charter schools must avoid apparent and actual conflicts of interest when administering grants and entering into contracts for equipment and services. Both federal and state laws regarding conflicts of interest are very strict. It is the responsibility of the charter school governing board to be in compliance with conflicts of interest policies.

## **Misuse of Funds and Grant Termination**

If it is determined that any grant funds have been misused, grant funds must be returned to OSPI and OSPI may terminate the grant award upon 30-days' notice if it is determined that the applicant is not fulfilling the funded program responsibilities as specified in the approved application.

# SUBGRANT GOALS

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## Academic Goals

The CSP grant requires subgrantees to provide specific subgrant goals and objectives (no more than five). Goals and objectives are required to be clear, defined and must align to the measures or assessments the school plans to use in the evaluation progress of students. All academic goals and objectives must be specific, measurable, action-oriented, realistic, relevant, time-bound, and include specific targets. Goals may be similar or identical to the school's school-specific goals; however, they must directly correspond to the proposed subgrant budget line items.

### Sample of Academic Goals and Objectives

- Measure of Assessment:
  - Completed K-8 scopes and sequence documents for humanities, mathematics, Progress-Maker Space.
  - Completion of performance and paper-based assessment for all content areas for grades K-8.
  - Completion of relevant rubrics for each course and grade level, K-8.
  - Pre-and post- educator skills development rubric completion related to diversity, equity and inclusion (DEI) and culturally responsive practices.
  - Assessment for each project for cultural relevance and commitment to DEI.
- Objectives:
  - Develop a comprehensive project plan for each course for all grade levels by May 2020.
  - Develop curricula materials from January to April 2020.
  - Research learning management tools and platforms to support curriculum development.
  - Training registration by December 2019.
  - Complete self-assessment before training.
  - Complete Progress-Maker Space project plans and complete relevant assessment rubrics.

## **Operational Goals**

In addition to goals and measurements for the academic performance, the grant project goals may contain measurements pertaining to the operational framework. The CSP subgrant measures and evaluates how your operational goals are being accomplished based upon the allowable CSP subgrant funds. Additionally, it is important to include a description of how the charter school will continue to operate once the federal grant has expired. Oversight may align to your goals in areas such as:

- Financial Management and performance
- Strength and stability of leadership, governance and personnel
- Enrollment, attendance and retention
- Staffing and professional development
- Parent and community involvement

### **Sample of operational performance goals**

- By the end of Year 1 of operation, the school will maintain a reserve of 5% of the budget, 7% by the end of Year 2, and 10% by the end of Year 3.
- By the end of Year 1 of operation, the school will retain marketing consulting services to develop separate marketing plans for each year's enrollment to include recruitment and retention.
- By the end of Year 1 of operation, the school will establish a Professional Development contracted service to provide weekly one-to-one and group professional development on various vision and mission topics.
- By the end of April in each school year, satisfaction surveys will be administered to students, parents, teachers and the community. Ninety percent or higher of parents, 90% or higher of students, 90% or higher of teachers, and 80% or higher of community members will report an overall level of satisfaction with the school. Students and teachers will have a 98% participation rate.

## **Financial Goals**

In addition to the goals and measurements for the academic performance and goals that contain measurements pertaining to the operational framework., the grant project goals must also include a description of how the subgrant funds will be used, including a description of how such funds will be used in conjunction with any other federal programs administered by the U.S. Department of Education. The financial description of how subgrant funds will be used must align to the allowable types of use of the funds for each year of the grant and must be limited to the amount allowable for that designed year. (Year 2 implementation dollars can consist of a carry-over from Year 1 implementation, but financial goals must anticipate spending down all funds for Year 1 implementation in these outlined goals).

### **Sample of financial goals**

- \$5,000 of the CSP funds will be used to cover the cost of the professional development activities and related travel for the Co-Founder within the Planning Year of the CSP subgrant.
- \$3,000 of the CSP funds will be used to cover the cost of program fee cost for the DEI intensive session, including the facilitator travel and speaking fee cost.
- \$130,000 of the CSP funds within the Planning Year of the CSP subgrant will be allocated to the salaries for the School Founder and CFO of the school. These salaries will be 65% of the overall salary of the School Founder and CFO and will be specifically dedicated to fulfilling the academic and operational allowable activities within the CSP Planning Year.
- \$62,000 of the CSP funds will be allocated to help supplement the creation of the development of the school's curriculum to ensure a strong start to the academic program by the fall of 2021. These funds will ensure that curricula developed for the school is standards-aligned and that the school has developed aligned tools to measure student progress.

## **Budget Narrative**

Once three to five CSP Goals and Objectives have been identified and measures and metrics written as part of the application, the school needs to develop a plan to accomplish the goals that include interim goals to measure progress and a general outline of the type of purchases that will become necessary. The following sample goals are abbreviated; most grant project goals will have three to five measures and more expenditures. Remember, all grant spending must fit clearly within one of the project goals. The specific costs outlined below can be within budgetary categories in the EDS/iGrants System. Note that it is not required that the goals must include costs as specifically as these examples prior to the submission for reimbursement.

- Grant Project Goal 1 – Academic Achievement: School will develop a standards-aligned academic STEM model with specific supports for educationally disadvantaged students designed to build skills so students are postsecondary- and workforce-ready.
  - Measure 1.1: Open school with standards-aligned scope and sequence of STEM curriculum for each grade level that includes lesson plans, unit plans, and tests with the first three months in place and the remaining curriculum in place before Winter Break.
  - Measure 1.2: By the end of Year 1 of operations, 80% of students will meet or exceed individual MAP growth targets and 100% of students will meet or exceed individual MAP growth targets by the end of the Year 2 of operations.

Project Goal 1 Academic Achievement		
Year 2	Middle School Science: Foss Science kits: Next Generation Waves (\$1,000), Chemical Interactions (\$1,984), K-5 Geology Kits at \$6,000 (30 K-5 students at \$200 each).	\$8,984
Year 2	Support: Special Education Training: Breakthrough Learning Set (\$495), Edge for ELL at \$2870 (35 students at \$82 each) and one teacher edition at \$130	\$3,495
Year 2	Assessments: NWEA MAP at \$1,400 (100 total enrollment at \$14 each), Star Spanish at \$575 (25 students at \$23 each)	\$1975

- Project Goal 2 – Professional Development: School will develop a strong professional development plan for teachers, administrators, and board members designed to build a culture focused on growth and continuous improvement, ultimately ensuring successful implementation of the school's mission and vision.
  - Measure 2.1: Each school year, 100% of teachers with less than three years' experience will be provided with ongoing mentorship by experienced teachers with more than seven years' experience.
  - Measure 2.2: Each school year, 90% of governing board members will visit the school to attend two classes and eat lunch with students.

Project Goal 2 Professional Development		
Year 2	Mentoring: \$3,600 (\$100/hour, two hours/month for four teachers)	\$3,600
Year 2	Curriculum Training: It's about Time science training (2 days at \$1,800), Colorado eLearning Collaborative training (2 days at \$1,000)	\$2,800
Year 2	Student Support Training: Breakthrough Learning Set (\$495)	\$495
Year 3	Leadership Training: CSP visit at \$1800, National Charter School Conference (1000 registration, \$800 airfare, \$1,200 lodging for two people)	\$4,800

# STUDENT RECORDS AND LAWS

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The CSP subgrantee must maintain all student records, including all physical copies of student records on-site. The subgrantee must have a policy for the timely and orderly transfer of student records in the event of a transfer or school closure. Additionally, the subgrantee must have a student records policy, including a clear policy for the transferring of student records. This policy should be included in the new school application.

[RCW 28A.710.210](#) and [RCW 28A.710.220](#) provide further information in regards to the legal requirement of this policy.

# GRANT CLOSEOUT

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## Final Report

The closeout of the CSP subgrant requires the following elements to be completed.

- The Final Grant Report is to be completed and submitted to the OSPI grant coordinator no later than 15 days out from the completion of the CSP subgrant.
- All Year 2 implementation funds (including any carry-over funds from Year 1 implementation) are to be spent down to 100% completion by September 30.
- Each awarded charter school is responsible for annual fiscal audits including these grant funds. Federal audit requirements contained in the Single Audit Act of 1984 may also apply. The charter school is expected to provide the SAO with complete financial information to satisfy federal and state requirements.

Please see Appendix 2 for a full template of the Final Report.

## Spend Down Planning and Annual Financial Report

As a condition of this federal grant, OSPI is responsible for evaluating subgrantees to ensure that they adhere to federal rules and regulations and accomplish their performance goals. An essential element of this includes the assurance that CSP subgrantees are spending down their award in a timely fashion and according to their budget and outlined goals and objectives. This includes an annual CSP financial report that must be included at Year End and at the close of the subgrant.

The spend down of funds is monitored in the Monthly Monitoring and Expenditure Reports and Quarterly and Year End Monitoring Reports, as well as during the On-Site Visit Rubric Review and Report and through the Final Report submitted by the subgrantee.

The requirement is that all allowable funds are spent down within the allowable timeframe of each year of the assigned grant period. A carry-over from the Year 1 Implementation to the Year 2 implementation may occur, but must be requested and be a reasonable percentage.

By the end of the Year 2 implementation, all carry-over funds and Year 2 implementation funds are expected to be spent down. The final purchases must be made no later than September 30 of the Year 2 implementation year. However, the subgrantee has up to 90 days to submit funds for reimbursement after September 30 of the Year 2 implementation year. The submission for reimbursement will not be allowed after the 90-day period after September 30 of the Year 2 implementation. It is recommended that, if possible, all submissions for reimbursements be made by the October 30 deadline.

The annual financial report specifically for the CSP subgrant will be based on information in the submitted Monthly, Quarterly and Year End Progress and Expenditure Reports. This information should accurately match and align within the EDS/iGrants System CSP subgrant school budget (including any revisions that are requested and approved) and monthly reports submitted to the OSPI grants coordinator.

For schools in Year 2, the Final Grant Report must be submitted within 15 days of the grant end date and will need to fully reflect a financial report that includes all finances for years within the subgrant cycle.

# FISCAL CONTROLS

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As part of the CSP subgrant, it is a requirement that all CSP subgrant recipients follow the fiscal procedures for all independent audit reports and verify that they are completed in a timely fashion. This is a requirement of the Washington State Auditor's Office. Below, you'll find an example of this verification. Please ask the CSP grant coordinator for a copy if you have not received it.

## FISCAL AND PROCEDURES VERIFICATION

This verification form is for confirmation, granting assurance that the recipients submitted their independent audit reports in a timely fashion.

Please sign and date below, indicating the date and assurance for fiscal control and procedure guidelines that you submitted your independent audit reports within the time frame required by the Washington State Auditor's Office.

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Signature

date

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CSP Grant Coordinator Signature

date

## **NO-COST EXTENSION**

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The No-Cost Extension (NCE) process is one in which the approved Charter School Program Grant agency applies for an extension up to 12 months beyond the original granted 3-year timeline. The agency in charge of the CSP grant applies to the U.S. Department of Education for an NCE. Specific grant details are given as part of the application for this extension and each request for an NCE must be applied for one year at a time. No additional schools can be approved for CSP funds beyond the original granted three-year timeline. There is no guarantee that an extension will be approved each year or subsequent years beyond the original granted three-year timeline. Any approved CSP subgrant schools are not guaranteed funding beyond the original granted three-year timeline. Any remaining funding as an approved part of the CSP subgrant is subject to the application and approval of each yearly NCE request.

All required obligations of the CSP grant and subgrantees are required to be maintained throughout any NCE timeline period.

# APPENDICES

## Appendix 1: Attachment 34

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### WASHINGTON STATE CHARTER SCHOOL PROGRAM STATEMENT OF ASSURANCES 2018-19

*The Board President and Board-Appointed Authorized Representative must sign below to indicate their approval of the contents of the application, and the receipt of program funds.*

On \_\_\_\_\_ (date), the Board of \_\_\_\_\_ (Charter School Applicant) \_\_\_\_\_ (the Board) hereby applies for and, if awarded, accepts the federal program funds requested in this application. In consideration of the receipt of these grant funds, the Board agrees that the General Assurances form for all federal funds and the terms therein are specifically incorporated by reference in this application. The Board also certifies that all program and pertinent administrative requirements will be met. These include the Education Department General Administrative Regulations (EDGAR), the Office of Management and Budget Accounting Circulars, and the U.S. Department of Education's General Education Provisions Act (GEPA) requirement.

Charter schools that accept funding through the Washington State Charter School Program Grant agree to the following assurances:

The authorized representative possesses the legal authority to apply for this grant and agrees to the following terms:

1. The applicant will annually, for the life of the grant, provide the U.S. Secretary of Education and the Washington State Office of Superintendent of Public Instruction (OSPI) such information as may be required to determine if the charter school is making satisfactory progress toward achieving the funded activities. This includes participation in any federal or state funded charter school evaluations or studies.

2. The applicant will fully cooperate with the U.S. Secretary of Education and OSPI in evaluating the program being funded by the grant.
3. The charter school will have a fully independent governing board that will exercise autonomy in all matters, to the extent authorized by chapter 28A.710 RCW, in such areas as budget, personnel and educational programs.
4. The charter school is either a public benefit nonprofit corporation as defined in RCW 24.03.490, or a nonprofit corporation as defined in RCW 24.03.005 that has applied for tax exempt status under section 501(c)(3) of the internal revenue code of 1986 (26 U.S.C. Sec. 501(c)(3)), is not a sectarian or religious organization, meets all of the requirements for a public benefit nonprofit corporation before receiving any funding under RCW 28A.710.220, is governed by an independent governing board, and will be operated according to the terms of a charter contract executed with an approved Washington State charter school authorizer.
5. The charter school understands acknowledges the administrative power and duties of charter school authorizers as outlined in Chapter 28A.710.100 RCW
6. The charter school functions as a local education agency under applicable federal laws and regulations, is responsible for meeting, and will meet, the requirements of local education agencies and public schools under those federal laws and regulations, including but not limited to:
  - a. Compliance with the Individuals with Disabilities Education Improvement Act (IDEA, 20 U.S.C. Sec. 1401 *et seq.*);
  - b. Compliance with the Federal Educational Rights and Privacy Act (FERPA, 20 U.S.C. Sec. 1232g);
  - c. Compliance with the Elementary and Secondary Education Act, as amended (ESEA, 20 U.S.C. Sec. 6301 *et seq.*), including but not limited to provisions on school prayer, the Boy Scouts of America Equal Access Act, the Armed Forces Recruiter Access to Students and Student Recruiting Information, the Unsafe School Choice Option, and provisions regarding assessments;
  - d. Compliance with requirements that ensure a student's records, and, if applicable, a student's individualized education program, will follow the student, in accordance with applicable federal and state law;
  - e. Compliance with Title IX of the Education Amendments of 1972 (20 U.S.C. § 1681);
  - f. Compliance with Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. § 794); and
  - g. Compliance with Title II of the Americans with Disabilities Act of 1990 (42 U.S.C. § 12101).

i. Compliance with McKinney-Vento Homeless Assistance Act of 1987 (42 U.S.C. Sec. 11431 et seq.

7. The charter school hires, manages, and discharges any charter school employee in accordance with the terms of Chapter 28A.710 RCW and the charter school's charter contract;

8. The charter school will receive and disburse funds solely in accordance with the purposes of the charter school;

9. To the extent it enters into contracts with any school district, educational service district, or other public or private entity for the provision of real property, equipment, goods, supplies, and services, including educational instructional services and including for the management and operation of the charter school, the charter school will do so to the same extent as other non-charter public schools, as long as the charter school's board maintains oversight authority over the charter school;

10. The charter school will not enter into any contracts for management operation of the charter school except with nonprofit organizations;

11. To the extent it enters into contracts with other entities regarding real property, the charter school will include provisions regarding the disposition of the property if the charter school fails to open as planned or closes, or if the charter contract is revoked or not renewed;

12. To the extent it issues secured and unsecured debt, including pledging, assigning, or encumbering its assets to be used as collateral for loans or extensions of credit to manage cash flow, improve operations, or finance the acquisition of real property or equipment, the charter school will not pledge, assign, or encumber any public funds received or to be received pursuant to RCW 28A.710.220 or under this grant;

13. The charter school ensures that no debt incurred by the charter school is a general, special, or moral obligation of the state or any other political subdivision or agency of the state;

14. The charter school will not pledge either the full faith and credit or the taxing power of the state or any political subdivision or agency of the state for the payment of the debt;

15. To the extent it solicits, accepts, and administers for the benefit of the charter school and its students, gifts, grants, and donations from individuals or public or private entities, the charter school will not solicit, accept, and administer any such gifts, grants or donations from sectarian or religious organizations and will not accept any gifts or donations the conditions of which violate Chapter 28A.710 RCW or any other state laws;
16. The charter school will issue diplomas to students who meet state high school graduation requirements established under RCW 28A.230.090 even though the charter school board may establish additional graduation requirements;
17. The charter school will not levy taxes or issue tax-backed bonds and will not acquire or attempt to acquire property by eminent domain;
18. The charter school will operate according to the terms of its charter contract and the provisions of Chapter 28A.710 RCW;
19. The charter school will comply with local, state, and federal health, safety, parents' rights, civil rights, and nondiscrimination laws applicable to Washington State school districts and to the same extent as school districts, including but not limited to chapter 28A.642 RCW (discrimination prohibition), chapter 28A.640 RCW (sexual equality), RCW 28A.605.030 (student education records), RCW 28A.320.125 (safe school plans), and chapter 28A.210 RCW (health and screening requirements);
20. The charter school will provide basic education, as provided in RCW 28A.150.210, including instruction in the essential academic learning requirements and will participate in the statewide student assessment system as developed under RCW 28A.655.070 and in accordance with the requirements of chapter 28A.710 RCW;
21. The charter school will employ certificated instructional staff as required in RCW 28A.410.025, provided that the charter schools may hire non-certificated instructional staff of unusual competence and in exceptional cases as specified in RCW 28A.150.203 (7);
22. The charter school will comply with the employee record check requirements in RCW 28A.400.303;

23.. The charter school will adhere to generally accepted accounting principles and be subject to financial examinations and audits as determined by the state auditor, including annual audits for legal and fiscal compliance;

24. The charter school will comply with the annual performance report under RCW 28A.655.110;

25. The charter school will be subject to the performance improvement goals adopted by the Washington State Board of Education under RCW 28A.305.130;

26. The charter school will comply with the Open Public Meetings Act in chapter 42.30 RCW and public records requirements in chapter 42.56 RCW;

27. The charter school will be subject to and comply with all legislation governing the operation and management of charter schools;

28. The charter school will comply with all state statutes and rules made applicable to the charter school in the charter school's charter contract;

29. The charter school will not engage in any sectarian practices in its education program, admissions or employment policies, or operations;

30. The charter school will be subject to the supervision of the Superintendent of Public Instruction and the State Board of Education, including accountability measures, to the same extent as other public schools, except as otherwise expressly provided by law;

31. The charter school will not limit admission on any basis other than age group, grade level, or capacity and must enroll all students who apply within these bases and will be open to any student regardless of his or her location of residence;

32. The charter school will not charge tuition, but may charge fees for participation in optional extracurricular events and activities in the same manner and to the same extent as do other public schools;

33. If capacity is insufficient to enroll all students who apply to the charter school, the charter school will select students through a lottery to ensure fairness;

34. The charter school will give an enrollment preference to siblings of already enrolled students;

35. The Board will annually determine the capacity of the charter school in consultation with the charter school's authorizer, with consideration of the charter school's ability to facilitate the academic success of its students, achieve the objectives specified in the charter contract, and assure that its student enrollment does not exceed the capacity of its facility;

36. The charter school will comply with all federal, state, county, region, or community health and safety laws, rules, or regulations that may apply to its facilities and property;

37. The charter school has disclosed any real, potential or perceived conflicts of interest that could impact the approval or operation of the charter school;

38. If applicable, the charter school will meet any preopening and/or reopening requirements or conditions imposed by its authorizer, including but not limited to requirements or conditions to monitor the start-up progress of the charter school and to ensure that the charter school is prepared to open smoothly on the date agreed, and to ensure that the charter school meets all building, health, safety, insurance, and other legal requirements for school opening;

39. The charter school will comply with, and fully participate in, any activity by its authorizer that the authorizer deems necessary for it to monitor, engage in oversight, or engage in corrective action pursuant to RCW 28A.710.180;

40. The charter school will comply with any corrective actions or sanctions imposed upon it by its authorizer pursuant to Chapter 28A.710 RCW;

41. The charter school will comply with all renewal and nonrenewal actions required of it by its authorizer or by law, including but not limited to the requirements imposed by RCW 28A.710.190 and .200;

42. The charter school will comply with any nonrenewal of termination actions imposed by its authorizer pursuant to Chapter 28A.710 RCW and duly adopted rules of the authorizer;
43. The charter school will report student enrollment in the same manner and based on the same definitions of enrolled students and annual average full-time equivalent enrollment as other public schools;
44. The charter school will comply with applicable reporting requirements to receive state or federal funding that is allocated based on student characteristics;
45. The charter school will, at all times, maintain all necessary and appropriate insurance coverage;
46. The charter school will indemnify and hold harmless the authorizer and its officers, directors, agents and employees, and any successors and assigns from any and all liability, cause of action, or other injury or damage in any way relating to the charter school or its operation;
47. If there are exceptions to these assurances, the charter school has described them in full detail on a separate page attached to this document.
48. The Board's members will complete the financial affairs statement disclosures as required by law and address any conflicts identified by such disclosure.
49. The applicant will provide such other information and assurances as the U.S. Secretary of Education and OSPI and SEA may require.
50. All of the information submitted in the application is true, correct, complete, and in compliance with state and federal law.
51. These assurances are made by the Board through its duly authorized representative.

**The Board has reviewed and discussed these assurances and passed a motion affirming current and future compliance with these assurances.**

It is the responsibility of each local charter school that receives funds under this grant to comply with all required federal assurances. Funded sites will be expected to cooperate with the Department in the development and submission of certain reports to meet certain state and federal guidelines and requirements. All grantees are required to provide requested data to OSPI. In addition, funded projects will be required to maintain appropriate fiscal and program records. Fiscal audits of funds under this program are to be conducted by the recipient agencies annually as a part of their regular audit. Auditors should be aware of the Federal audit requirements contained in the Single Audit Act of 1984.

**IF ANY FINDINGS OF MISUSE OF FUNDS ARE DISCOVERED, PROJECT FUNDS MUST BE RETURNED TO THE WASHINGTON OFFICE OF SUPERINTENDENT OF PUBLIC INSTRUCTION. OSPI may terminate a grant award upon thirty (30) days' notice if it is deemed by OSPI that the applicant is not fulfilling the funded program as specified in the approved project application.**

Grant recipients will be required to keep and maintain all equipment purchased with grant funds in accordance with the requirements of federal law and regulation. Should the charter school close or be terminated by the sponsor, the charter school will work with OSPI and the school's authorizer regarding distribution of assets purchased with this grant.

The governing body of the charter school applicant has authorized the filing of this application and the undersigned representative has been duly authorized to file this application and act as the authorized representative of the applicant in connection with this application.

I do hereby certify that all facts, figures, and representations made in this application are true and are correct and are consistent with the statement of certifications. Furthermore, all applicable statutes, regulations, and procedures for program and fiscal control and for records maintenance will be implemented to ensure proper accountability of funds distributed for this project. All records necessary to substantiate these items will be available for review by state and federal monitoring staff. All progress reports and the final report requested through this grant program will be filed on time. I further certify that all disbursements will be obligated after the grant has been awarded and the revised budget (if applicable) is approved and prior to the termination date; all disbursements have not been previously reported; and disbursements were not used for matching funds on this or any special project.

Name of Applicant School: \_\_\_\_\_

Charter School Leader/Principal (Printed Name): \_\_\_\_\_

Charter School Leader/Principal Signature: \_\_\_\_\_

Date Signed: \_\_\_\_\_

Charter School Board President/Chair (Printed Name): \_\_\_\_\_

Charter School Board President/Chair Signature: \_\_\_\_\_

Date Signed: \_\_\_\_\_

## Appendix 2

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### Washington State Charter School Program (CSP) Subgrant

### Final Report

#### Purpose:

As a requirement to exit the Washington State Charter School Program (CSP) Subgrant, all Year 2 Implementation Schools must submit a Final Report on the project goals and objectives, budget, drawdown spending, student data report and activity evidence completed over the years in which the school was awarded and participated in the CSP Grant as a subgrantee.

In addition to fully answering the questions below, please provide an itemized budget of all items purchased and activities participated in, as a recipient of the CSP subgrant. Please submit this final report by September 10, 2019. This report can be submitted in conjunction with your final monthly progress report and can be included as an Excel Spreadsheet, Word Document, PDF or combination thereof. If any questions or clarifications are needed, please contact the CSP Grant Coordinator at the following e-mail address: [casey.caronna@k12.wa.us](mailto:casey.caronna@k12.wa.us)

#### Questions:

**Q1: Please give a detailed explanation of the progress made towards meeting the subgrant project goals and objectives over the course of your time within the CSP subgrant. If any goals were not met, or meaningful progress was not made, please give a detailed outline of the steps that remained unresolved and evidence for why this was the case.**

**Q2:** Are there any outstanding concerns or questions that need to be addressed from the monthly, quarterly or previous year end meetings with the CSP Grant Coordinator before the closeout of this subgrant? If so, please give a brief explanation or list of these concerns in regard to the subgrant project goals and objectives.

**Q3:** Were there any unanticipated circumstances that prevented the timely draw down of funds for the CSP subgrant? If so, please explain.

**Q4:** Have board members been updated and informed to the use of the CSP funds over the past year and throughout the subgrant cycle? If so, how have they been informed of the use of these funds? Additionally, has the board been informed that the end of these funds will occur and are they prepared to move forward without these funds in place?

**Q5:** Based upon your approved, allowable activities, how did the CSP subgrant provide support for student achievement over the past year and throughout your grant cycle? Please provide specific examples about how the CSP subgrant provided support for student achievement over the past year, including how the funds were used to expand opportunities for all students, particularly serving traditionally underserved student populations.

**Q6:** Please provide an outline for any collaborative work done with local school districts, or any other school districts, during the grant cycle. Please describe the outcomes of that collaboration.

**Q7: Have you had any compliance or performance issues with any other state agency over the course of the grant cycle, if so, have those issues been resolved?** Please give a brief description of any compliance or performance issues that remain and the action that will be taken to resolve any issue or concern.

**Q8: If you have had any compliance or performance issues during the grant cycle with your authorizer, have those issues been resolved?** Please give a brief description of any compliance or performance issues that remain and the action that will be taken to resolve any issue or concern.

**Q9: Did the CSP Grant Coordinator provide effective and timely communication about the CSP subgrant throughout the grant cycle?** Please provide a brief description with feedback on how this communication occurred and what could be done to improve this communication in the future.

**Q10: Do you have any suggestions or changes that you would like to see made to improve the Monthly/Quarterly/Year End Progress Report, Site Visit Process, Technical Assistance or Professional Development that you participated in as a subgrantee throughout the grant cycle?**

## CSP Final Report: Itemized Budget and Evidentiary Items

Two categorical items need to be attached to this final report.

1. Please provide an itemized budget that includes all expenditures for the entire grant cycle. This itemized budget should include all items purchased and all services paid for with reimbursed CSP funds. This itemized budget does not need to include salary itemization, however, a brief description on the type (categorical) of individuals who received partial funding for their salary from CSP reimbursed funds is required.
2. Please provide 5 – 6 examples of the CSP subgrant funds being used. Examples of evidence may include pictures of any new equipment or materials including chairs, desks, art or science equipment, artifacts of curriculum or professional development materials that informed the community about your school.

Please attach these two elements to this report within your final report e-mail. It is requested that one PDF document suffice for all elements of the report. If that becomes too large of a document, then separate e-mails with a separate PDF, Excel and/or Word documents are acceptable.

## Comparative Grant Cycle Student Data Report

Please provide comparative student data for the month in which you began using the CSP subgrant, compared to the end of the school year in your last year of using the CSP subgrant. This data includes the number of students and the percentage of students that make up these individual categories within your school.

Year Comparisons:	
School Name:	
LEA #:	
Date:	
Prepared By:	

October – First Student Enrolled Month Under CSP Subgrant

Student Demographic Data	Number	Percentage
Student Count Total:		
Male:		
Female:		
Asian:		
Hispanic/Latino of any race(s):		
American Indian/Alaskan Native:		
Black/African American:		
White:		
Two or More Races:		
Free or Reduced Price Meals:		
Special Education:		
Transitional Bilingual:		
Section 504:		

May – Last Student Enrolled Month Under CSP Subgrant

Student Demographic Data		
Student Count Total:		
Male:		
Female:		
Asian:		
Hispanic/Latino of any race(s):		
American Indian/Alaskan Native:		
Black/African American:		
White:		
Two or More Races:		
Free or Reduced Price Meals:		
Special Education:		
Transitional Bilingual:		
Section 504:		