Explore Knowledge Academy of Public Speaking

Fiscal Policy and Procedures

PURPOSE

Explore Knowledge Academy of Public Speaking (EKAPS) has established procedures to maintain internal control over all assets. The purpose of establishing internal controls is to provide a reasonable assurance that the school will accomplish its objectives of safeguarding assets, ensuring validity of financial reports and records, promoting operational efficiency, and ensuring compliance with laws, regulations and established charter school and state policies and procedures.

§ 200.303 INTERNAL CONTROL OBJECTIVES

Establish and maintain effective internal control over the Federal award that provides reasonable assurance that the non-Federal entity is managing the Federal award in compliance with Federal statutes, regulations, and the terms and conditions of the Federal award. These internal controls should be in compliance with guidance in "Standards for Internal Control in the Federal Government" issued by the Comptroller General of the United States or the "Internal Control Integrated Framework", issued by the Committee of Sponsoring Organizations of the Treadway Commission (COSO).

a. Comply with the U.S. Constitution, Federal statutes, regulations, and the terms and conditions of the Federal awards.

b. Evaluate and monitor the non-Federal entity's compliance with statutes, regulations and the terms and conditions of Federal awards.

c. Take prompt action when instances of noncompliance are identified including noncompliance identified in audit findings.

d. Take reasonable measures to safeguard protected personally identifiable information and other information the Federal awarding agency or pass-through entity designates as sensitive or the non-Federal entity considers sensitive consistent with applicable Federal, State, local, and tribal laws regarding privacy and responsibility over confidentiality.

COMPONENTS

- Control Environment
- Risk Assessment
- Control Activities
- Information and Communication
- Monitoring

INTRODUCTION

Explore Knowledge Academy of Public Speaking (EKAPS) is responsible for establishing and maintaining an internal control structure, including policies and procedures, and is also responsible for ensuring that the school complies with laws and regulations applicable to state and federal programs.

All internal control policies are based on the 1994 report issued by the Committee of Sponsoring Organizations of the Treadway Commission (COSO) and standards adopted by the American Institute of Certified Public Accountants and the Federal Office of Management and Budget.

The COSO report defines **internal control** as *a process established to provide reasonable assurance to specific school objectives such as effectiveness and efficiency of operation, reliability of financial reporting, and compliance with applicable laws and regulations will be achieved.* Internal controls include the plans, methods, and procedures used to meet goals and objectives. Effective internal control serves as the major defense in safeguarding assets and preventing and detecting errors, fraud, waste, and abuse.

The COSO report recognizes that internal control is affected by people. People are involved in every process that calls for specific internal controls. The responsibility for good internal control rests with the leadership of a school district or charter school. The Chief Education Officer with the approval of the school board or governance council sets the objectives, puts the control mechanisms and activities in place, and monitors and evaluates the control and sets the general “tone” of the organization. However, all personnel in the organization play important roles in an effective and efficient operation.

Explore Knowledge Academy of Public Speaking (EKAPS)’s internal control structure consists of the five following elements:

- Control Environment
- Risk Assessment
- Control Activities
- Information and Communication
- Monitoring

These elements set the minimum standard acceptable for internal control and provide the basis against which internal control is to be evaluated. These standards apply to all aspects of a school’s operations, both problematic and financial, and provide a general framework for developing and organizing policies and procedures.

CONTROL ENVIRONMENT

The control environment is the collective effect of various factors in establishing, enhancing, or mitigating the effectiveness of specific policies and procedures. The control environment reflects the overall attitude, awareness, and actions of the school board, leadership, and others concerning the importance of control and its emphasis in Explore Knowledge Academy of Public Speaking (EKAPS).

The control environment sets the tone of Explore Knowledge Academy of Public Speaking (EKAPS). By providing discipline and structure, it is the foundation for all other components of internal control. Control environment factors include integrity, ethical values, and competence of the school's staff; the school's management's philosophy and operating style; the way management assigns authority and responsibility; the way management organizes and develops its staff; and the attention and direction provided by the board.

Explore Knowledge Academy of Public Speaking (EKAPS) has implemented an internal control system based on its internal and external needs, including elements modeled according to the COSO model. It is the policy of the school to ensure that its control environment provides for strong administrative governance. The school's internal control system is a relevant evaluation tool for internal control over financial reporting.

It is the policy of Explore Knowledge Academy of Public Speaking (EKAPS) that its own internal control system and review evaluations:

- Be free from bias,
- Permit reasonably consistent qualitative and quantitative measurements of the school internal control system,
- Are sufficiently complete so that those relevant factors that would alter a conclusion about the effectiveness of the school internal controls are not omitted.

Philosophy and Code of Ethics

Explore Knowledge Academy of Public Speaking (EKAPS) makes every effort to set an honest and ethical tone for the school that is demonstrated at every level. The school operations reflect the overall attitude, awareness, and actions of the school board, leadership, and others concerning the importance of how the school views internal control and the management of these controls.

Nondiscrimination

Explore Knowledge Academy of Public Speaking (EKAPS) is committed to nondiscrimination in educational programs/activities and employment, as required by applicable federal and state laws and regulations, on the basis of: race, color, national origin or ethnic group identification, marital status, ancestry, sex, sexual orientation, gender identity or expression, genetic information, religion, age, qualifying mental or physical disability, based on the Americans with Disabilities Act as Amended (ADAA), Section 504 of the Rehabilitation Act of 1973, or the Individuals with Disabilities in Education (IDEA) Act; or Military or veteran's status. Any claims of discrimination may be submitted as a grievance.

Appeal/Grievance

A grievance must be filed as soon as possible, but no longer than 30 days after disclosure or discovery giving rise to the grievance. A parent/student who has a grievance must provide the following information in writing to the principal and/or assistant principal.

- The name of the school employee or other individual whose decision or action is at issue.
- The specific decision(s) or actions at issue.
- Any board policy or law that the parent or student believes has been misapplied, misinterpreted, or violated, and the specific resolution desired.

- Upon receiving the written grievance, and/or principal or assistant principal will then
  - Schedule and hold a meeting with the students within five school days of receiving the grievance request.
  - Conduct any investigation of the facts necessary before rendering a decision; and provide a written response to the grievance within ten days of the meeting.

Commitment to Competence

All personnel need to possess and maintain a level of competence that allows them to accomplish their assigned duties, as well as to understand the importance of developing and implementing good internal control. Leadership at Explore Knowledge Academy of Public Speaking (EKAPS) will identify appropriate knowledge and skills needed for various jobs and provide needed training, as well as candid and constructive monitoring, and performance appraisals.

The school makes every effort to maintain communication with all employees regarding policies and procedures of the school, including, but not limited to, periodic training for personnel, both at school sites and online, and regular meeting of the school board. The board policies and meeting agendas are maintained by the school website along with other information necessary to the requirements for safekeeping of various assets and transparency of financial operations for both employees and taxpayers. Supervisory hierarchies are maintained to ensure proper approvals and processes are in place.

Organizational Structure

Leadership at Explore Knowledge Academy of Public Speaking (EKAPS) will devise, establish, and maintain an effective organizational structure to consider the following matters:

- Devise a system of measurement and accountability for employee performance.
- Establish a policy in which the delegation of the responsibility for employee actions is combined with sufficient authority to perform the assigned activities.
- Create and maintain budgets and financial reports which facilitate the discharge of assigned responsibilities and monitor activities at each level of the organizational structure.
- Operates a system of checks and balances which separates incompatible activities to preclude absolute control by any individual and provides for supervision by higher levels of management and for the monitoring of overall school activities.
- Provide an organizational structure to support the school's framework for planning, directing, and controlling operations to achieve objectives.

CONFLICT OF INTEREST/ANTI-FRAUD

Standards of Conduct

School employees are considered public employees and must comply with the Code of Ethical Standards of the State of Nevada as codified in the Nevada Revised Statutes (NRS) 281A.400 through NRS 281A.665. The purpose is to engage in school; business activities in a fashion designed to avoid any conflict of interest or the appearance of impropriety. The determination as to whether a conflict of interest exists is to be made by the school board. All employees of the Explore Knowledge Academy of Public Speaking (EKAPS) shall be governed by the laws of the state of Nevada. No employee shall, under penalty of law, receive unlawful compensation, commission, or personal profit in the course of performing school duties nor shall the position of any employee be used for unlawful purposes or for personal gain. Explore Knowledge Academy of Public Speaking (EKAPS) is committed to providing a work environment governed by the highest ethical and legal standards. In all situations, employees are expected to conduct all activities with integrity, ethically and in accordance with applicable laws and regulations. Part of maintaining an ethical workplace is providing employees with the opportunity to provide honest feedback. Explore Knowledge Academy of Public Speaking (EKAPS) will not tolerate retaliation of any kind against an employee who reports in good faith a violation of law or of this policy. Chapter 281A, NRS Chapter 288, NRS Chapter 289, and NRS Chapter 391.

Prohibition of Fraud:

- EKAPS has zero tolerance for fraud or fraudulent activities. Fraud is defined as any intentional act or omission designed to deceive others, resulting in the victim suffering a loss and/or the perpetrator achieving a gain.
- Examples of fraud include, but are not limited to theft, embezzlement, falsification of records, financial misconduct, misuse of school resources, and conflicts of interest.

Conflicts of Interest:

- No employee, officer, or agent of the organization may participate in the selection, award, or administration of a contract if they have a real or perceived conflict of interest.
- A conflict of interest arises when the employee, officer, or agent— or any of their immediate family members, partners, or organizations with which they have a financial or personal interest—stands to benefit from the contract.

Organizational Conflicts:

- The organization must also avoid any organizational conflicts of interest, where it has a financial interest in the vendor or contractor being selected.

Disclosure Requirements:

- Employees, officers, and agents are required to disclose any potential conflicts of interest in writing.
- These disclosures must be evaluated, and steps must be taken to eliminate or manage conflicts before proceeding with procurement activities.

Gifts and Gratuities:

- Employees involved in procurement must not solicit or accept gifts, favors, or anything of monetary value from contractors, potential contractors, or parties to subcontracts. However, an exception can be made for unsolicited items of nominal value (e.g., items worth less than $25).

Disciplinary Actions:

Violations of these standards may result in disciplinary actions, up to and including termination, depending on the severity of the conflict or ethical breach.

F1: INTERNAL CONTROLS SYSTEM CFR §200.303:

EKAPS will maintain a robust internal controls system to prevent, detect, and respond to fraud. This system will include:

- **Segregation of Duties:** Ensuring that no single individual has control over all aspects of any critical financial transaction, such as purchasing, receiving, and accounting.
- **Authorization and Approval:** All transactions must be authorized and approved by appropriate personnel in accordance with established policies and procedures.
- **Reconciliation and Monitoring:** Regular reconciliations and reviews of financial records, bank statements, and reports to detect discrepancies or irregularities.
- **Access Controls:** Restricting access to financial systems and records to authorized personnel only.
- **Independent Reviews:** Periodic internal and external audits to evaluate the effectiveness of internal controls and identify potential areas for improvement.

The internal controls system will be evaluated regularly by the Finance Manager, in collaboration with the Superintendent, to ensure its effectiveness in preventing and detecting fraud.

Anti-Bribery

It is our policy to conduct our educational activities in an honest and ethical manner. We take a zero tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our dealings and relationships wherever we operate and to implementing and enforcing effective systems to counter bribery.

Reporting Fraud:

- Employees are encouraged to report any suspected fraud or unethical behavior immediately. Reports can be made confidentially and anonymously to the Finance Manager, Superintendent or the School Board.
- EKAPS will not tolerate retaliation of any kind against an employee who reports, in good faith, a violation of law or this policy.

Investigation of Fraud:

- All allegations of fraud will be investigated promptly and thoroughly by designated personnel or external investigators, as appropriate. The investigation will be conducted confidentially to protect the rights of all parties involved.

- If fraud is confirmed, EKAPS will take appropriate disciplinary action, which may include termination of employment, referral to law enforcement, and legal action to recover losses.

Personnel:

The recruitment of competent, honest individuals is administered through the services of the principal and Human Resources. The training of staff regarding the established policies and procedures governing all financial transactions is administered through leadership.

Segregation of Duties/Authorization/Approval

To ensure proper internal control, no single individual shall have control over all aspects of any critical financial transaction. The following roles are segregated to comply with 2 CFR §200.303 and NRS 281A.400:

- <u>Accounts Payable:</u> Managed by the Finance Manager. Responsible for processing payments after receiving approval from the Superintendent or the Principal.
- <u>Cash Receipts:</u> Managed by the OfficePersonnel (Registrar, Office Specialist) who does not participate in reconciliation activities.
- <u>Bank Reconciliation:</u> Handled by the Finance Manager, which does not have check-signing authority. The Superintendent will verify these transactions.
- <u>Oversight and Monitoring:</u> The Superintendent will monitor these activities to ensure compliance with the established segregation of duties and to prevent any potential conflicts of interest.

Superintendent

<u>Responsibilities</u>**:**

- Overall authority and oversight for the management of grant funds.
- Reviews and approves large financial transactions (e.g., those exceeding $5,000) and budget modifications.
- Signs off on grant applications and final financial reports.
- Approves any grant-related contracts or agreements.
- Performs monthly verifications of grant-related accounts (e.g., comparing ledger entries with bank statements).

<u>Authorization/Approval:</u>

- Final approver of all major expenditures and budgetary changes.
- Authorizes grant applications and final financial reports before submission to grantor agencies.
- Provides the final signature on grant-related contracts, including vendors and service agreements.
- Ensures alignment with the school's strategic goals and federal guidelines.

Finance Manager

Responsibilities:

- Responsible for recordkeeping and maintaining accurate financial records.
- Tracks grant funds received and expended, ensuring transactions comply with the approved budget and federal guidelines.
- Prepares and processes payments related to grant expenses.
- Performs monthly reconciliations of grant-related accounts (e.g., comparing ledger entries with bank statements).
- Prepares regular financial reports for submission to the Superintendent and the board.
- Manages the day-to-day administrative operations related to grant-funded purchases.
- Collects and organizes supporting documentation for all grant expenses (invoices, receipts).
- Create purchase orders and submit them for approval by the Superintendent.
- Initiates purchase requests for office supplies, services, and other grant-related operational needs.

Authorization/Approval:

- Enters financial data and processes approved transactions.
- Reconciles bank statements and financial records to identify discrepancies and ensure accurate reporting.
- Cannot approve transactions—ensures the separation of recordkeeping from approval.
- Processes payments for approved expenses and documents all transactions.
- Initiates purchase requests but cannot approve expenditures.
- Maintains documentation for auditing and financial reviews.

Finance Manager/Superintendent

Responsibilities:

- Coordinates the overall management of grants, ensuring that grant activities are carried out according to federal and grantor requirements.
- Prepares and submits grant proposals, including budget narratives and financial forecasts.
- Reviews and tracks the budget to ensure allowable, reasonable, and allocable costs under the grant.
- Prepares and submits interim and final grant financial reports.

- Communicates with federal grant agencies or donors to clarify any financial or programmatic requirements.

Authorization/Approval:

- Monitors spending to ensure costs are within the approved budget and meet grant requirements.
- The Finance Manager can review and propose budget adjustments, but cannot authorize expenditures or approve payments.

Methods of Assigning Authority and Responsibility

EKAPS's organizational structure clearly defines key areas of authority and responsibility and establishes appropriate lines of reporting. The environment is also affected by the way the school delegates authority and responsibility throughout the organization for operating activities, reporting relationships, and authorization protocols.

Audits

Explore Knowledge Academy of Public Speaking (EKAPS) Superintendent and Finance Manager are responsible for the following:

- Evaluate the request for proposal for annual financial audit services,
- Recommend the selection of the financial auditor,
- Attend the entrance and exit conferences for annual and special audits,
- Meet with external financial team at least monthly after audit field work begins until the conclusion of the audit,
- Be accessible to the external financial auditors as requested to facilitate communication with the board and the Superintendent,
- Track and report progress on the status of the most recent audit findings and advise the school board on policy changes needed to address audit findings,
- Provide other advice and assistance as requested by the school board; and
- Be subject to the same requirements regarding the confidentiality of audit information as those imposed upon the school board by The Audit Act and rules of the state auditor.
- Above all, the Superintendent's role primarily is to aid in fulfilling its responsibilities with respect to its oversight of the following:
    - The quality and integrity of the school's accounting and reporting practices and controls, and the financial statements and reports of the school,
    - The school's compliance with legal and regulatory requirements,
    - The independent auditor's qualifications and independence; and

- The performance of both the school's internal audit function and independent auditors.

Personnel Policies and Practices

Explore Knowledge Academy of Public Speaking (EKAPS)'s Leadership stakeholders are charged with establishing appropriate practices for hiring, orienting, training, evaluating, counseling, promoting, compensating, and disciplining personnel. Providing sufficient supervision is also a requirement.

External Influences

Because governmental, economic, regulatory, and operating conditions continually change, systematic reviews should be established to identify and address any special risks prompted by such changes that are external to the school.

Transaction Authorization

Budgets are prepared annually, based on estimates of revenues and expenses. The budget is allocated to each school program area and the authorization or expending of funds is assigned to the Superintendent and Finance Manager for monitoring. The Finance Manager reviews and approves the receipt of the order and invoice, ensuring the appropriate amount is charged. The manager of technology will add all new equipment purchased to the inventory list. All proposed transactions are authorized when they are consistent with policies, procedures, regulations, and laws.

Transaction Recording

Transactions are recorded at the time of authorization resulting in the encumbrance of the budget. The Finance Manager is responsible for verifying the amounts, the classification to the appropriate account codes, and the proper authorization of all transactions prior to posting to the Financial Management System. All source documents (checks, warrants, etc.) used to record transactions are official school forms and are sequentially numbered by the accounting system for accountability. All voided check warrants are marked VOID and kept on file for the auditor's review. All voided Purchase Orders are marked VOID and are reflected in the Financial Management System. The check signatory must not be the person who creates checks or who does the bookkeeping. The Finance Manager reconciles the bank statement. The Superintendent verifies the bank statements. The Finance Manager prepares deposit documentation and reconciliations.

Safekeeping Assets

The access to assets is limited by assigning primary custodians for the assets at the school. The primary custodian is responsible for monitoring the access of the building, cash, and other assets.

Record Reconciliation

Administration and the board will manage the comparison of actual assets on hand with the amounts recorded in the financial management system. Monthly reconciliation of bank statements, fixed asset records, and other financial records are prepared and verified during the quarterly board meetings. All discrepancies found during the reconciliation process are researched and corrected at the time they are detected. Reconciliation of bank accounts is handled by the Finance Manager. Verification of bank accounts is handled by the Superintendent. All records are examined and reconciled to determine that transactions were properly processed and approved.

It is the policy of EKAPS to have the bank statements addressed to the administrative offices. Bank statements shall be reviewed and reconciled monthly by the Finance Manager. *All employees of EKAPS are required to comply with the Code of Ethical Standards of the State of Nevada, as well as other relevant laws and regulations, including NRS Chapter 281A, NRS Chapter 288, NRS Chapter 289, and NRS Chapter 391.*

Section 427 of the General Education Provisions Act (GEPA) (20 U.S.C. 1228a)

Explore Knowledge Academy of Public Speaking (EKAPS) recognizes the importance of equitable access to, and participation in, federally assisted programs for students, teachers, and their beneficiaries with special needs. Potential barriers that can impede equitable access to and participation in these programs include gender, race, national origin, color, disability, and/or age.

Individuals who are members of special populations will be provided with equal access to enrollment and placement in educational programs available to individuals who are not members of special populations, including specific courses, apprenticeship programs, Title I, and to the extent practicable, comprehensive career guidance and counseling services, and shall not be discriminated against on the basis of their status as members of special populations.

Descriptions of the steps Explore Knowledge Academy of Public Speaking (EKAPS) will employ to overcome these barriers are as follows:

- Ensuring accessibility of facilities and programs for all students, teachers, and other stakeholders, by eliminating natural barriers for the enhancement of mobility and accessibility.
- Staff Development for teaching students in the least restrictive environment.
- Providing academic adjustments and modifications in curriculum and instruction.
- Equipment adaptation to ensure special populations can use equipment appropriately.
- Providing related services such as occupational and physical therapy services, transportation, etc., to enhance participation programs.
- Utilizing classroom assistants and tutors to enhance inclusionary practices.

GAAP (GENERALLY ACCEPTED ACCOUNTING PRINCIPLES)

These principles are designed to ensure consistency, transparency, and comparability in financial statements, allowing stakeholders like investors, regulators, and management to understand and trust financial information.

Key elements of GAAP include:

1. **Principle of Regularity:** Adherence to GAAP standards is mandatory.
2. **Principle of Consistency:** Financial reporting methods must be consistent over time.
3. **Principle of Sincerity:** Financial statements must reflect the true financial condition of the entity.
4. **Principle of Materiality:** All material information must be disclosed.
5. **Principle of Prudence:** Financial data should not be overly optimistic or pessimistic.

6. **Principle of Periodicity:** Financial statements should be reported over consistent time periods (e.g., quarterly, annually).
7. **Principle of Full Disclosure:** Financial reports should include all information that may affect a reader's understanding of the financials.

GRANT FUNDING

Under Nevada state law, the State Public Charter School Authority (SPCSA) is required to function as the Local Education Agency (LEA) for charter schools it approves and oversees. Effective April 4, 2022, the U. S. The Department of Education (USED) transitioned away from DUNS numbers and began to use Unique Entity Identifiers (UEIs). UEIs will be administered through SAM.gov, and EKAPS will automatically be assigned a UEI. As an LEA that receives subgrants from NDE, the SPCSA could be subjected to various enforcement measures from NDE. Grants are typically awarded to schools for many different reasons. At Explore Knowledge Academy of Public Speaking (EKAPS), we have applied to grants that:

- help EKAPS meet the goals in our School Performance Plans (SPP)/Continuous Improvement Plans (CIP)
- help EKAPS raise the achievement of students as a low/underachieving school
- support the diverse needs of our special populations of students
- help EKAPS address the impacts of COVID-19
- assist with Teachers' school supplies

STATE PUBLIC CHARTER SCHOOL AUTHORITY (SPCSA) A PASS THRU AGENCY

The Explore Knowledge Academy of Public Speaking (EKAPS) is committed to ensuring the responsible management and use of federal funds received as a subrecipient through the State Public Charter School Authority (SPCSA).

This policy outlines the procedures and controls that EKAPS will implement to manage pass-through funds in compliance with applicable federal, state, and local regulations. By adhering to this policy, EKAPS aims to maintain transparency, accountability, and integrity in the administration of these funds, supporting its mission to provide quality education while meeting all regulatory requirements.

Compliance with Subaward Requirements

EKAPS will comply with all terms and conditions specified in the subaward agreement, including federal regulations under the Uniform Guidance (2 CFR Part 200), applicable federal statutes, and any state or local requirements.

EKAPS will ensure that all expenditures of pass-through funds are allowable, allocable, reasonable, and necessary for the performance of the federal program.

Financial Management and Internal Controls

EKAPS will maintain a financial management system that provides accurate, complete, and timely disclosure of financial results for each federal award. The system will include records that identify the source and application of funds for all grant activities.

EKAPS will implement internal controls to safeguard federal funds, ensure compliance with federal regulations, and prevent fraud, waste, and abuse.

Documentation and Reporting

EKAPS will maintain thorough documentation for all costs charged to the grant, including invoices, receipts, contracts, and other supporting materials. Documentation will be retained for a minimum of five years or as required by the grant agreement.

EKAPS will submit financial and performance reports to the SPCSA as required by the subaward agreement. These reports will be submitted accurately and on time, reflecting the actual use of funds and progress toward program objectives.

Use of Funds Within Period of Availability

EKAPS will ensure that all expenditures are incurred during the award's period of availability, as specified in the subaward agreement. Any expenditures outside of this period will not be charged to the grant.

Pre-award costs will not be incurred or charged to the grant unless explicitly allowed by the subaward agreement or with prior written approval from SPCSA.

Monitoring and Oversight

EKAPS will monitor all activities funded by the subaward to ensure compliance with applicable requirements. This includes regular reviews of financial transactions, program performance, and adherence to the terms of the subaward.

EKAPS will cooperate with any monitoring, site visits, audits, or reviews conducted by SPCSA or other authorized entities to assess compliance with federal regulations and the terms of the subaward.

Corrective Actions

If noncompliance is identified through internal reviews, audits, or external monitoring by SPCSA, EKAPS will promptly develop and implement a corrective action plan to address the issues. This plan will be submitted to SPCSA for approval, if required.

EKAPS will take timely corrective actions to prevent future noncompliance and ensure ongoing compliance with all grant requirements.

Training and Capacity Building

EKAPS will provide ongoing training to staff involved in managing pass-through funds to ensure they understand and comply with all applicable federal, state, and local regulations. Training will cover topics such as financial management, internal controls, documentation, and reporting.

Record Retention

EKAPS will retain all records related to the subaward, including financial records, supporting documents, and communications with SPCSA, for at least five years from the date of submission of the final expenditure report or as required by the subaward agreement.

GRANT EXPENDITURES, INSTRUCTIONS & REQUIREMENTS (GEIR)

EKAPS will comply with all government requirements under each grant as approved by the board of directors, which includes, but is not limited to the proper expenditure of allocated grant awarded funds.

2 CFR 200.302 This includes funding for building contracts, travel and lodging, equipment and supplies, salaries and benefits, time and effort stipends and professional development training payments.

Request for Proposals Process

The SPCSA will work on behalf of the Nevada Department of Education to notify all charter schools about the availability of grants through the Request for Proposals (RFP) process. The Requests for Proposals, also known as 'funding opportunities', each provides specific and related information about the included grant program(s).

Grant Availability

There are several kinds of grants available from the Department and include entitlement, allocation, continuation and competitive.

- Entitlement grants are awarded to recipients based on formulas set forth in laws or regulations. Recipients are entitled to receive funds if they comply with the programmatic requirements outlined in the RFP.
- Allocation grants are awarded to recipients based on formulas developed to promote Department priorities. The programmatic requirements outlined in the RFP must be met before the grant will be awarded.
- Continuation grants are those in which the recipients of grants in one year are awarded funds at the same level for the following year. These are grants that were initially competitive and are funded for multiple years on a continuation basis.
- Competitive grants are open to applicants that meet eligibility criteria listed in the RFP. Rating sheets are used in the review process to ensure a fair and open competition among eligible applicants.

DATA PRIVACY AND SECURITY AND FAMILY EDUCATIONAL RIGHTS AND PRIVACY ACT (FERPA)

Explore Knowledge Academy of Public Speaking (EKAPS) takes seriously its obligations to secure information systems and protect the privacy of data collected, used, shared, and stored. Personally identifiable information includes a student's name and other direct personal identifiers, such as the student's identification number. Personally identifiable information also includes indirect identifiers, such as the name of the student's parent or other family members; the student's or family's address; and personal characteristics or other information that would make the student's identity easily traceable. With some exceptions, such PII is considered confidential and cannot be disclosed without the parent's or student's (if the student is 18 or older) written consent. All staff are trained on FERPA policies and procedures annually.

CFR §200.303 - Internal Controls

- Requires the non-federal entity to establish and maintain effective internal controls that provide reasonable assurance that assets, including grant funds, are managed properly and in compliance with federal statutes and regulations.

2 CFR §200.302(b)(4) - Financial Management

- Requires the use of effective control over and accountability for all funds, property, and other assets. This includes adequately safeguarding assets and ensuring they are used solely for authorized purposes.

Information Security and Privacy Policy

This policy, approved by the State Board of Education on January 29, 2015, covers the following topics: staff training on data use, security breaches, personally identifiable student data, and requirements for data sharing agreements.

File Security

The Registrar will:

- Be responsible for the establishment, security and maintenance of the retention of records and inventory records.
- Only collect, use or disclose personal information with the consent of the individual student or legal guardian, unless otherwise authorized under FERPA.
- On or before collecting personal information, disclose to the individual verbally or in writing the purposes for the collection of personal information.
- Only collect, use or disclose personal information for purposes that a reasonable person would consider appropriate in the circumstances and that fulfill the purposes disclosed by the school or are otherwise permitted under FERPA.
- Secure records and files with access within the school authority restricted to those individuals who, by the nature of their work, are required to have access to the information.

The Registrar has immediate responsibility for the day-to-day work of the records office and the service it provides to users of records. They will initiate regular meetings with office personnel to take immediate action to make improvements when problems are reported.

All employees are trained annually on FERPA and student privacy best practices annually, including the consent (or not) to disclosures of personally identifiable information (PII).

CYBERSECURITY

To protect sensitive data, including PII and federal/grant-related information, the following cybersecurity measures are implemented 2 CFR §200.303(b)(4):

- Role-based Access Control: Only authorized personnel have access to systems and data necessary for their roles. Access is restricted based on user roles to minimize exposure to sensitive grant and personal information.
- Multi-factor Authentication (MFA): MFA is required for all users accessing grant management systems, financial data, and any systems that store or process PII.
- Encryption in Transit: Data is encrypted during transmission across networks using secure protocols to prevent interception by unauthorized parties. (Password Protection)
- Firewall Protection: Network firewalls are implemented to prevent unauthorized access to internal systems that handle sensitive data, ensuring grant assets and PII are shielded from external threats.
- Data Loss Prevention Tools (DLP): DLP solutions are deployed to prevent unauthorized sharing, downloading, or transmission of sensitive data, including PII and grant information.
- Monitoring: Continuous monitoring of network traffic and endpoints for potential data exfiltration is performed to ensure that grant assets and PII are not mishandled. (NAC 388A.515)
- Reporting and Notification: Any breach of PII or grant asset information will be reported to relevant authorities within required timeframes, and affected individuals will be notified promptly.
- Cybersecurity Awareness: All employees are trained annually on cybersecurity best practices, including the protection of PII and financial data, phishing prevention, and secure data handling.

Family Educational Rights and Privacy Act (FERPA)

FERPA requires that a consent for disclosure of education records be signed and dated, specify the records that may be disclosed, state the purpose of the disclosure, and identify the party or class of parties to whom the disclosure may be made. 34 CFR § 99.30. As such, oral consent for disclosure of information from education records would not meet FERPA’s consent requirements. Only school staff with a need to know will have access to student files and all identified staff will be trained regarding FERPA and appropriate school procedures in regard to maintaining student confidentiality.

Our FERPA responsibilities:

- Records are always kept in a secured location accessible only to School Administration or approved personnel.
- Ensure confidential folders in and out of the office filing room where records are kept. (Information contained in these folders is available only to approved and listed personnel in the school who have legitimate need of the information for educational planning.)
- Records are not to be removed from school property at any time unless at the request of a school that the student has enrolled.

- Records are sent to the new school if the school provides an official Records Request.
- Copies of records may be given to parents or students over the age of 18. Copies of records may be given to third parties only if the parent has given a signed authorization to release records to the third party.
- Confidential folders are developed for any student evaluated and participating in special education programs, including speech services. The folder is used to maintain a student's special education records. Our Special Education Team is responsible for the development of the confidential folder.
- Password Protection on all confidential electronic documents are required.
- Every legal guardian should identify themselves by confirming their name, their students name, DOB, and address.
- That is the minimum to ask of the legal guardian. If you still do not feel comfortable, keep verifying student information.
- Only work issued electronics may be used to access student information. Personal cell phones, iPad, iPod, iPhone, smartphones, personal laptops, personal computers should not be used to access or share information.

PERFORMANCE EVALUATIONS

EKAPS will conduct annual evaluations of all federally funded grant programs. These evaluations will assess:

- Programmatic Performance: Assess the alignment of grant expenditures with program objectives.
- Financial Performance: Evaluate budget vs. actual expenditure to ensure that funds are spent as per grant guidelines.
- Compliance: Ensure compliance with all applicable federal, state, and local laws (NAC 387.720). Results of the evaluation will be presented to the Board of Trustees annually, and corrective actions will be implemented as necessary to improve program efficiency

The Superintendent will initiate the evaluation process by setting deadlines and collecting necessary data. Finance Manager will gather operational data and performance metrics (e.g., participant numbers, outputs, milestones achieved) that are tied to grant objectives. Finance Manager will prepare a detailed financial overview, showing how grant funds were spent and whether those expenditures align with the program's goals. The Superintendent will review the operational data to ensure it accurately reflects the implementation of grant funded activities. Once approved, the Superintendent will submit the performance evaluation to the grantor agency in compliance with 2 C.F.R. §200.329, which requires accurate and timely reporting of grant performance. The Superintendent and Finance Manager review the feedback from Nevada Department of Education/State Public Charter School Authority and implement any required corrective actions.

RISK ASSESSMENT

A risk assessment is a process to identify, analyze, and manage risk. A school needs a plan to identify both external and internal risks. The plan will help Explore Knowledge Academy of Public Speaking (EKAPS) to understand how those risks affect activities, to assess their significance, to manage their effect, and to provide for continuous monitoring. Risk identification can often be integrated with a school's planning activities.

It is important to implement the most cost- effective measures that will result in minimizing risk. Critical success factors include but are not limited to:

- Obtaining leadership support and involvement
- Designating focal points
- Defining procedures
- Involving business and technical experts
- Holding operating departments responsible
- Limiting the scope of individual assessments
- Documenting and maintaining results

Explore Knowledge Academy of Public Speaking (EKAPS) analyzes all processes to determine inherent risks in each of its accounting processes. Emphasis is on communication to ensure that each employee is aware of necessary processes to meet certain objectives.

MONITORING

Explore Knowledge Academy of Public Speaking (EKAPS) systems and internal activities require monitoring to assess the quality of the system's performance over time.

Monitoring of financial reporting and spending is done at quarterly meetings (as a minimum) with the Finance Manager, and Superintendent. This includes a discussion on key topics to include review of the Budget, Accounting, Payroll, Financial and Compliance Reporting, and Grant Allocations/Spending.

External audits are conducted annually. External audits include a review of the school's internal control system. Internal control weaknesses and deficiencies are immediately corrected by the school.

F2: ALLOWABILITY OF COSTS POLICY AND PROCEDURES

EKAPS must expend and account for all Federal awards in accordance with state laws and procedures for expending and accounting for the state's own funds. 2 CFR §200.402 (b)(6); §200.402; §200.405

ALLOWABILITY OF COSTS AND COST PRINCIPLES

In accordance with EKAPS's Internal Controls Policy, the school ensures compliance with federal guidelines pertaining to the treatment of costs on sponsored project activities. 2 CFR 200.402 (b)(7);

Allowable Costs

A cost must be:

- Necessary, reasonable, and allocable to the award.
- Aligned with award terms and exclusions.

- Consistent with policies for both federal and non-federal activities.
- Not double-counted for cost-sharing.
- Properly documented.

Reasonable Costs

To determine reasonableness:

- Is the cost necessary and efficient for the program?
- Does it comply with laws, regulations, and award terms?
- Does it align with market prices in the area?

EKAPS keeps documentation to confirm all costs meet the criteria of 2 CFR §200.402(b)(7), §200.403, and §200.405.

ALLOWABILITY OF COSTS/COST REVIEW PROCESS

1. **Pre-Expenditure Review:** Superintendent and Finance Manager evaluate costs for reasonableness and allocability.
2. **Cost Allowability Assessment:** The Superintendent ensures the request aligns with the grant's objectives and checks whether the costs are allowable, allocable, and reasonable under 2 C.F.R. §200.403 and §200.405. The Superintendent must review and give final approval. The Superintendent ensures all costs are allowable and in line with grant objectives.
3. **Written Justification:** The narrative/justification developed by the Finance Manager to show how the cost benefits the federal program. The superintendent must review and give final approval.

These procedures align with both (Generally Accepted Accounting Principles) GAAP and federal regulations under Subpart E—Cost Principles.

Program Specific Rules and Segregation of Duties/Authorizations

The Superintendent and Finance Manager will review grant specific rules to ensure state and federal spending is in compliance with the supplement, not supplant provision. Most programs, including ESEA Title I, Part A, Title II, Part A, Title III, and IDEA contain the "supplement, not supplant" provision means that federal funds must be used to supplement the level of funds from non-federal sources by providing additional services, staff, programs, or materials.

Explore Knowledge Academy of Public Speaking (EKAPS) Procurement Process

Planning - The Superintendent reviews school needs and alignment to school improvement goals. The school improvement team ensures grant narratives are reviewed for what is allowable, reasonable and necessary.

Research – School Improvement Committee provides input regarding suggested items to be purchased with grant narrative. The Superintendent and Finance Manager reviews the suggestions and approves them.

Execution – The Finance Manager looks for best prices and requests quotes, if needed. Finance Manager creates P.O. to include funding program, price, quantity & fiscal year. Purchases are placed.

Tracking - Items are received and checked in by the Front Office. Finance Manager checks in the items and creates packets to include P.O. proof of purchase, and Packing Slips. Finance Manager or IT Director updates inventory spreadsheets.

Monitoring – Superintendent and Finance Manager ensure that grants tracking spreadsheet and inventory spreadsheet are in alignment. They additionally ensure funds are spent down throughout the fiscal year.

Submission and Alignment – Finance Manager completes monthly grant submission as applicable. The Finance Manager supplies supplemental documents as needed. The Superintendent reviews and completes submission and ensures reimbursements are reflected in the budget

The six-step process—Planning, Research, Execution, Tracking, Monitoring, and Submission and Alignment—is designed to ensure alignment with both school goals and federal guidelines, particularly those outlined in 2 CFR §200.402(b)(7), §200.403, §200.405, and §200.303.

Planning

The Superintendent, Principal and Finance Manager develop procurement plans that align with programmatic goals. The Finance Manager ensures that the procurement narratives are carefully reviewed to determine that all costs are allowable, reasonable, and necessary as per 2 CFR §200.403. This upfront review helps ensure that all expenses meet federal guidelines for necessity and reasonableness.

Research

The Superintendent collaborates with the Finance Manager to research vendors, pricing, and product specifications. This phase ensures that purchases are cost-effective and meet the principles of allocability outlined in 2 CFR §200.405. Through this process, the school confirms that costs are proportional and allocable to the federal award, ensuring compliance with federal cost principles.

Execution

The formal purchasing process is initiated with the creation of purchase orders (P.O.s). Each P.O. includes vendor information, price, quantity, and fiscal coding to ensure traceability and proper allocation to the grant. This step reinforces compliance with 2 CFR §200.402(b)(7) and §200.405, ensuring that all expenses are allowable and allocable to the federal award based on the benefit received by the project.

Tracking

Items received are meticulously tracked by the Office Personnel and Finance Manager, who verify that they align with the purchase orders. The Finance Manager confirms that all items match the specifications listed in the P.O.s and resolves any discrepancies. This tracking mechanism supports §200.303, ensuring proper internal controls and accurate records of costs associated with the federal awards.

Monitoring

The Superintendent continuously monitors grant expenditures, verifying that they stay within the approved budget and are charged to the correct fiscal codes. This phase involves real-time monitoring and adjustment to ensure that purchases remain reasonable, necessary, and allocable. The internal controls set forth in §200.303 are observed, ensuring compliance, and reducing the risk of errors or fraudulent expenditures.

Submission and Alignment

The Finance Manager conducts monthly reconciliations of grant-related expenses, ensuring they align with the grant's budget and financial reporting requirements. The monthly reports are submitted to the Superintendent for verification, review and approval. This process ensures compliance with 2 CFR §200.403 and §200.405, as costs must be supported by proper documentation and be reasonable, necessary, and allocable to the federal grant.

Oversight by Board of Directors

The Board of Directors plays a critical role in maintaining oversight of the entire process. Quarterly accounting reviews are performed, and the Board Treasurer reviews all reports to ensure accurate reflection of the school's financial activity. This aligns with 2 CFR §200.303, ensuring that robust internal controls are in place to safeguard federal funds and maintain compliance with federal reporting and record-keeping requirements.

TIME AND EFFORT

EKAPS keeps accurate records of personnel time. EKAPS will maintain written procedures for time and effort reporting as required by 2 CFR §200.430. Employees whose compensation is charged to federal grants will maintain records that reflect the total activity for which the employee is compensated. These records will:

- Accurately reflect the work performed,
- Be incorporated into the official records of the school,
- Be approved (digital signature) by both the employee and HR Payroll Manager and/or Finance Manager. Records will be reviewed quarterly to ensure compliance with federal regulations. Noncompliance will trigger corrective action.

The Stipend Request Form identifies the Extra Duty Pay by services rendered, time period, and % of time expended. It is signed by the employee and supervisor. It is validated by the Superintendent and submitted to payroll by the HR Payroll Manager. The Finance Manager and HR Payroll Manager track any Extra Duty Pay on a Stipend Tracker. Stipend tracker is shared with the Superintendent for review for monthly grant submissions. Documentation is passed to the Finance Manager for reimbursement, if applicable.

Supervisors create scheduled work hours for each employee. HR Payroll Manager certifies time and effort reports to confirm that employees' time allocations reflect actual work performed. Certification will occur at least monthly.

Time and Effort Compliance

In accordance with federal regulations, time and effort records must meet the following requirements:

- <u>Incorporation into official records</u>: Time and effort reporting must be incorporated into EKAPS's official payroll system and retained as official records.

- Reflect total activity: The documentation must reasonably reflect the total activity for which an employee is compensated, covering both federal and non-federal activities.
- Reasonable assurance: Time and effort reporting must provide reasonable assurance that charges are accurate, allowable, reasonable, and properly allocated to the federal program/cost objective.

The Finance Manager and/or HR Payroll Manager performs periodic reconciliations of time and effort reports against actual payroll data to ensure consistency and accuracy. Any discrepancies identified will be investigated and resolved promptly.

Semi-Annual Certification (Time and Effort)

EKAPS keeps semi-annual certification for grant funded employees who have worked solely on a single cost objective. Reimbursement requests for salaries, hourly wages, and benefits will be supported by periodic certifications that the employees worked solely on that program for the period covered by the certification.

- Semi-Annual Fall Certification Period: July - December (DUE January)
- Semi-Annual Spring Certification Period: January-June (Due July)
- Semi-Annual Summer Certification Period: July-August (Due September -if needed)

TITLE I FUND POLICY (2 U.S.C. §6321 (b)(1))

In compliance with EKAPS State and local educational agencies (SEAs and LEAs) must use federal Title I funds only to supplement the educational services that would normally be provided with State and local funds, not to supplant (replace) them.

Title I Fund Review and Compliance Process

To establish a final, fully compliant plan, the school adheres to a rigorous, multi-level review and approval process. This structured progression ensures that all Federal Title I funds are strategically allocated to **supplement—rather than supplant—standard educational services**.

The sequential development and approval pipeline consists of the following steps:

- **Step 1: Administrative Needs Assessment & Drafting:** The school administration conducts an initial meeting to evaluate student needs, determine the most impactful allocation of Title I funds, and construct the preliminary draft plan.
- **Step 2: Superintendent Compliance Review:** The Superintendent reviews the initial draft plan specifically to verify regulatory compliance, ensuring that federal dollars provide additional, targeted resources beyond baseline state and local funding.
- **Step 3: Community Council Collaboration:** The draft plan is presented to the Community Council—a stakeholder group comprising school administration, support staff, teachers, board members, and family

participants. The Council reviews the proposal and provides actionable recommendations for refinement.

- **Step 4: Stakeholder Input & Final Alignment:** Within the first 30 days of the new school year, two critical reviews occur simultaneously to finalize the draft:
  - **Title I Parent Meetings:** Parents review the proposed plan and offer feedback regarding fund utilization.
  - **Staff Comprehensive Review:** School staff meet to evaluate all Title I through Title IV grants and plans, aligning them into a cohesive final draft.
- **Step 5: Governing Body Final Approval:** The integrated draft plan, incorporating feedback from all previous committees and stakeholder groups, is submitted to the school's highest governing body for definitive approval.

Documentation and Evidentiary Trail

To maintain full compliance and accountability, transparency is maintained throughout the entire life cycle of the planning process. Every stage of development is thoroughly documented and archived using:

- **Official meeting agendas and comprehensive minutes** for each committee and stakeholder assembly.
- **Iterative versions of the draft plan**, illustrating the specific modifications made after each successive review level.

GENERAL TRAVEL POLICY

All travel expenses incurred in connection with federally funded grant activities must be reasonable, necessary, and directly related to the performance of the federal award. This policy applies to all employees who travel for school-related purposes using federal funds.

Compliance with Federal Guidelines

Travel costs will be subject to the conditions of 2 CFR §200.475 and must:

- Be necessary for carrying out the federal award program.
- Be reasonable and reflect prudent travel decisions.
- Be allocable to the federal award, meaning the costs directly benefit the program or project.
- Be supported by proper documentation.

Allowable Travel Costs

Allowable travel-related costs are those incurred by EKAPS employees while performing activities necessary for the federal grant program. These include transportation, lodging, meals, and incidental expenses. The costs must comply with the federal award's terms and EKAPS's internal policies.

Transportation

Travelers are expected to use the most economical form of transportation available, considering both time and cost. The following transportation costs are allowable:

- Airfare: Employees must book economy or standard fare for air travel, unless a valid reason exists for a higher fare (e.g., disability accommodation).
- Ground transportation: Costs for taxis, rideshares, rental cars, and public transportation are allowable if they are reasonable and necessary. Mileage reimbursement for the use of personal vehicles will be based on the current IRS standard mileage rate.
- Rental cars: Employees may rent cars if it is more economical or necessary for the performance of grant-related activities. Car rental costs must be approved in advance.

Lodging

Lodging costs are allowable when overnight stays are necessary for attending grant-related conferences, meetings, or training. Lodging expenses must be reasonable and should not exceed the per diem rates established by the U.S. General Services Administration (GSA) for the travel destination.

Meals and Incidental Expenses

Meals and incidental expenses are allowable, but they must comply with the GSA per diem rates for the travel location. If the event or meeting provides meals, employees may not claim reimbursement for those meals. Alcohol is never reimbursable under federal grants.

Travel Approval Process

All travel must be approved in advance by the appropriate supervisor and must include documentation showing:

- The purpose of the travel and its relation to the federal grant.
- Estimated costs, including transportation, lodging, meals, and other anticipated expenses.
- Any alternative travel options considered.

Grant-Specific Approval

For travel costs that will be charged to a federal grant, additional approval from the Finance Manager is required. This ensures that the travel is directly related to the performance of the federal award and that the costs comply with the Uniform Guidance.

Post-Travel Reimbursement Procedures

Upon returning from travel, employees must submit a travel expense reimbursement form with supporting documentation within 30 days of the trip’s completion. The following documentation is required:

- Receipts: Employees must provide itemized receipts for all expenses, including airfare, lodging, ground transportation, and meals. Only actual expenses with supporting documentation will be reimbursed.

- Expense Report: The report must detail the total travel costs and compare them to the approved pre travel estimate. Discrepancies between the estimated and actual costs must be explained.
- Travel Form: This form will be completed by the Finance Manager outlining all travel expenses. The form is certified by an employee.

Documentation Requirements

To comply with 2 CFR §200.475, documentation must include:

- Proof that the travel was directly related to grant activities.
- A breakdown of expenses by category (e.g., transportation, lodging, meals).
- Any relevant meeting agendas, conference brochures, or registration confirmations that support the necessity of the travel.

FRINGE BENEFITS POLICY

At Explore Knowledge Academy of Public Speaking (EKAPS), our approach to fringe benefits is to maintain compliance with federal and state regulations, including 2 CFR 200.431. This policy ensures consistent application, accurate cost allocation, and compliance with requirements related to compensation, leave and benefit administration.

It applies to all employees of Explore Knowledge Academy of Public Speaking (EKAPS). Eligibility for fringe benefits is determined by employment status, length of service, and job role, as outlined below. Distinctions may be made between full-time, part-time, temporary, and contract employees, consistent with applicable laws and organizational needs.

Fringe Benefits Offered

Explore Knowledge Academy of Public Speaking (EKAPS) provides the following categories of benefits:

Statutory Benefits

- Workers’ compensation
- Unemployment insurance
- Public Employees’ Retirement System (PERS) participation

Leave Benefits

- Personal (PTO) leave
- Sick leave
- Bereavement leave
- Holidays (as published annually in the school calendar)

- Court leave, military leave, and administrative leave

Insurance and Health Benefits

- Health, dental, and vision insurance
- Life insurance and long-term disability insurance (where applicable)

Retirement and Savings Plans

- Employer retirement contributions through PERS or approved plans
- 403b plans

Voluntary Benefits

- Flexible spending accounts, short-term disability, accident, cancer, critical illness, hospital indemnity, term life insurance, legal counseling and identity theft protection

ELIGIBILITY, ENROLLMENT, AND CONTRIBUTIONS

Eligibility: Full-time employees are eligible for fringe benefits the first of the month after hire date, unless otherwise specified. Part-time or temporary employees may be eligible for certain statutory benefits only.

Enrollment:

- **New Hires**: Enrollment is completed during onboarding, within 30 days of eligibility.
- **Annual Open Enrollment:** Employees may modify benefit elections once per year during the designated open enrollment period.
- **Special Enrollment Period:** Employees may add or remove dependents during a Life Qualifying Event.

Employer Contributions: Explore Knowledge Academy of Public Speaking (EKAPS) contributes a percentage of health insurance premiums and retirement contributions as outlined in the annual budget.

Vesting: Retirement contributions follow PERS vesting schedules.

Leave Administration

- **Administration:** Leave is awarded when hired in accordance with state law and employee classification.
- **Carryover:** Annual limits and caps on accrual are specified in the Employee Handbook.
- **Requests:** Qualifying employees must submit leave requests online in the ADP Payroll system and are required for use of any sick leave or PTO leave.

Accounting And Allocation

- Fringe benefit costs are allocated to funding sources proportionally based on actual payroll distribution.

- Direct charges to federal awards will be documented with justification and maintained in accordance with 2 CFR 200.403–405.

Documentation And Recordkeeping

The following records will be maintained:

- Payroll and time/effort reports
- Benefit invoices and PERS contribution reports (Forms 502 and 503 with proof of payment)
- Leave accrual and usage records
- Audit reports related to benefits

All records will be stored in the Explore Knowledge Academy of Public Speaking (EKAPS)'s secure financial management system and retained for the period required under 2 CFR 200.334 and applicable state requirements.

Communication Of Policy

This policy will be included in Explore Knowledge Academy of Public Speaking (EKAPS)'s Employee Handbook and made accessible to all staff via internal communication systems. Updates will be distributed to all employees in a timely manner.

Responsibilities

- **HR Payroll Manager:** Administers enrollment, processes changes, and communicates benefits.
- **Finance Manager:** Calculates, reviews, and applies fringe benefit rates; allocates costs; and maintains documentation.
- **Superintendent / Designee:** Ensures overall compliance with this policy and applicable federal regulations.

EMPLOYEE HEALTH AND WELFARE POLICY

At Explore Knowledge Academy of Public Speaking (EKAPS), our approach to employee health and welfare costs is to maintain compliance with federal and state regulations, including 2 CFR 200.437. The objectives of this policy are to:

- Promote a safe, healthy, and productive workplace.
- Support employee well-being through health, wellness and safety programs.
- Ensure equitable and compliant allocation of costs across organizational activities.

This policy applies to all employees of Explore Knowledge Academy of Public Speaking (EKAPS). Covered costs include those related to health programs, workplace safety initiatives, employee assistance and wellness programs, and other activities designed to improve employee morale, performance and working conditions.

Explore Knowledge Academy of Public Speaking (EKAPS) affirms its commitment to maintaining a safe and supportive environment in accordance with OSHA, the Affordable Care Act (ACA) and other applicable regulations.

Allowable Employee Health And Welfare Costs

Explore Knowledge Academy of Public Speaking (EKAPS) may incur the following allowable costs:

Employee Wellness Programs: Costs associated with health screenings, fitness challenges, smoking cessation, stress management workshops and similar initiatives.

Safety Programs: Training sessions, personal protective equipment (PPE) not tied to specific grants, ergonomic assessments and safety committee activities.

Employee Relations Activities: Non-entertainment recognition programs, internal communications, and activities designed to improve morale and efficiency.

Food Services: Costs for snack bars, or other facilities for employees when operated on a break-even basis.

Other Related Activities: Additional costs that consistently improve employee health, morale, or performance, provided they are allowable and reasonable.

Each type of cost must be reasonable, necessary, and clearly tied to improving working conditions or employee performance.

Cost Allocation

Indirect Costs: No Indirect costs are charged to grants.

Direct Costs: If any health and welfare costs are directly charged to a federal award, justification and documentation must demonstrate direct benefit, prevent double charging, and comply with allocation standards under 2 CFR 200.403–405.

Equitable Distribution: Costs will be apportioned fairly to all benefiting activities to ensure no disproportionate allocation to federal awards.

HEALTH AND WELFARE PROVISIONS

Benefits: Explore Knowledge Academy of Public Speaking (EKAPS) provides health insurance coverage, wellness resources, sick leave, and reasonable accommodations for disabilities in accordance with law.

Safety: Regular workplace safety assessments, required training and emergency preparedness drills are implemented.

Responsibilities: Employees must adhere to safety practices and participate in wellness initiatives as appropriate. The employer ensures compliance, provides resources and enforces standards.

POLICY IMPLEMENTATION

- This policy will be included in the Employee Handbook, presented during new hire orientation and reinforced through ongoing staff communications.

- Training programs and resources will be provided to support employee participation.
- The Superintendent and HR Manager will review and update the policy annually to maintain compliance and effectiveness.

DOCUMENTATION AND RECORDKEEPING

The following records will be created and retained:

- Invoices, receipts, and contracts for health, safety and wellness programs.
- Financial reports showing revenues, expenses and cost allocations.
- Payroll records supporting direct cost allocations.
- Logs of employee participation in health and welfare programs.
- Documentation of internal controls and approvals by the Board or leadership.

Records will be securely stored in the Business Office systems and retained in accordance with 2 CFR 200.334 and applicable state retention laws.

Responsibilities

HR Manager: Administers wellness, health, and safety programs; communicates benefits; and monitors employee participation.

Finance Manager: Calculates, reviews, and applies allocation methodologies; maintains financial documentation.

Superintendent/Designee: Ensures overall compliance with this policy, federal regulations, and applicable state laws.

F3: ACCOUNTING AND FINANCIAL MANAGEMENT

ACCOUNTING SYSTEM MANUAL

At EKAPS, financial stewardship and transparency are key components of our commitment to delivering high-quality education. A strong partnership with the school's Financial Management System has been established to ensure robust financial management practices and compliance with all applicable regulations. This collaboration is anchored by the AptaFund Accounting System Manual, a comprehensive guide that serves as the cornerstone for all financial operations.

Financial Management Standards

According to 2 CFR §200.302(b), non-federal entities must maintain effective financial management systems that meet the following seven standards:

A. Identification: Accurate identification of federal awards received and expended.

B. Financial Reporting: The production of financial reports that comply with the terms of federal awards.

C. Accounting Records: Maintenance of accurate accounting records, including source documentation, to support all financial transactions.

D. Internal Controls: Effective internal controls to safeguard federal funds and ensure compliance with federal statutes and regulations.

E. Budget Control: Processes to ensure that expenses are within the approved budget for each federal award.

F. Cash Management: Procedures to manage the drawdown of federal funds and ensure compliance with cash management requirements.

G. Cost Allowability: A process for ensuring that all costs charged to federal awards comply with cost principles.

1. TRANSACTION IDENTIFICATION & PURCHASING RECORDING

The Superintendent is responsible for assuring that all purchases against the assigned budgets are appropriate and necessary and shall approve all requests for purchasing. The requests for purchase orders (requisitions) is the initial electronic document submitted to the Finance Manager and once approved, the document is assigned a purchase order number from the Finance Manager and the amount is encumbered into the encumbrance ledger. Purchases in excess of $10,000 must be preapproved by two of the following people, Superintendent, Finance Manager or Principal.

All transactions related to federal awards must be identified by specific codes that correspond to the federal award, grant program, or cost objective. This ensures that each expenditure can be directly traced to the appropriate federal funding source. Transactions must be entered into the financial management system within 5 business days of the transaction date.

Components Required for Federal Fund Tracking 2 CFR §200.302(b):

The following components must be tracked for each federal award received:

- Assistance Listing Number (ALN):
  - Formerly known as CFDA (Catalog of Federal Domestic Assistance), the ALN is a unique identifier assigned to federal programs. Each federal grant must be tracked with its ALN to ensure compliance with program-specific requirements.
- Title and Number of the Federal Award:
  - The official title and number of the federal award must be recorded to ensure clarity and accuracy in the accounting system and financial reports.
- Federal Award Identification Number (FAIN):
  - The FAIN is assigned by the federal awarding agency and must be recorded and used for tracking and reporting purposes. It helps distinguish between different federal awards and subawards.
- Award Year:
  - The year in which the federal award is made must be tracked to ensure that funds are used within the allowed period of performance and that time-based restrictions are adhered to.

- Pass-Through Entity (PTE):
  - If the federal funds are received through a pass-through entity (e.g., the State Public Charter School Authority), the name and identifying information of the PTE must be tracked to ensure proper reporting.
- Federal Awarding Agency:
  - The name of the federal agency that made the award must be tracked and associated with the respective federal funds.

Micro-Purchases

Micro-purchase means a purchase of supplies or services using simplified acquisition procedures, the aggregate amount of which does not exceed the micro-purchase threshold. Purchases within the micro purchase threshold can be awarded without soliciting competitive price quotations if the price is reasonable. Ways to verify the reasonableness of a price is to compare previous purchases, have personal knowledge of the item being purchased, or compare to similar items being purchased.

Encumbrances

The initiating department forwards all requisitions over $500 for respective fund approvals as designed in the Financial Management System's security. The person responsible for the various funds verifies account code, fund number and checks to see if all necessary approvals are in place. Once receipt of the order has been verified as complete and correct, a copy is returned to the Finance Manager. This "OK" is attached to the purchase documents (including applicable invoices) and the payment can be issued. All invoices should be mailed directly to the school by the vendors.

The Finance Manager will regularly review all encumbrances to ensure that they are allowable, allocable, and in accordance with the terms of the federal grants or awards. Encumbrances must be liquidated within the allowable time frame specified by the grant, typically within 90 days of the grant end date, unless otherwise stated in the grant agreement.

Spenddown of Funds:

The Finance Manager, in collaboration with the Superintendent, will monitor the expenditure rate of federal funds to ensure that funds are spent within the period of performance. Expenditures will be reviewed monthly to prevent under- or over-expenditure.

Program managers will develop spenddown plans to ensure timely use of funds, avoiding large unspent balances at the end of the grant period. Any significant deviations from spenddown plans will be documented, justified, and reported to the Finance Manager for appropriate action.

Carryover Funds:

The LEA will comply with all federal and state regulations regarding limitations on carryover funds. Carryover of funds will only be permitted when allowable under the specific grant terms and conditions. If carryover is allowed, the Finance Manager will work with the SPCSA to calculate the allowable carryover amount at the end of each grant period, ensuring it does not exceed any limitations set by the federal agency.

The Finance Manager and Superintendent will establish a monitoring system to ensure compliance with all applicable encumbrance, spenddown, and carryover rules. This system will include regular reviews of financial records, expenditure reports, and programmatic needs.

Receiving & Opening the Mail:

The product/merchandise ordered is delivered directly to the front offices for tracking purposes. Individuals at the school site and/or Finance Manager verify receipt and indicate this on a copy of the Purchase Order. Once this document has been received by the Finance Manager, release of payment can be made to the vendor by the Accounts Payable personnel.

Accounts Payable:

All vendor invoices are mailed to the Finance Manager. The vendor invoice is matched to the receiving copy of the Purchase Order. Once the documents are matched, the items invoiced are checked back to the items listed on the approved copies of the purchase order. The Finance Manager checks each invoice carefully to verify amounts due, shipping and handling costs, and any other applicable discounts, etc. After these verifications are in place, payment can be processed.

The Financial Management System generates a check register, a purchase order report, and a journal of entries. These are completed for each fund as applicable. These reports are verified for accuracy before the checks are printed. Then, the checks are forwarded to the Superintendent for review. A listing of all checks written is created from the Financial Management System and is presented to the Board for approval.

Bank Reconciliations:

It is the policy of EKAPS to have the bank statements addressed to the Finance Manager. Bank statements shall be reviewed and reconciled monthly by the Finance Manager. Bank statements shall be verified monthly by the Superintendent. The Finance Manager cancels all checks as the checks clear the bank (as indicated on each bank statement) in the Financial Management System bank reconciliation software and locates any discrepancies in the balances and makes any journal entries necessary for correction. The monthly check registers, transactions journals, and general ledger may be accessed from the Financial Management System for review by the Superintendent and other interested parties. All journal entries needed for correction are detailed on the edit report from the Financial Management System.

Per Diem & Mileage Act:

Employees and Board members of Explore Knowledge Academy of Public Speaking (EKAPS) are entitled to reimbursement of costs associated with authorized trips and expenses for official school business. To properly control reimbursement activities, the Finance Manager is responsible for approving all expense reimbursements submitted by school staff. The Finance Manager is responsible for entering all payments into the appropriate general ledger and creating the checks. The approved check signers sign the checks and expense reports approved through the procedure as defined above.

Employees never approve actions affecting their own reimbursement. The check signers and Superintendent have signature authority. Expenses must be recorded in the month they are incurred. For audit purposes, it is extremely important that expense reports get turned in monthly with current expenses. Leaving information out or giving incorrect information will delay the reimbursement of expenses.

Use of EKAPS Expense Report:

Employees are to provide detailed descriptions so that expenses are correctly classified. An attachment to a receipt must be turned in for every expense. Number receipts with the corresponding line item on the expense report and sign the expense report in ink. Handwritten expense reports will not be accepted. Tech supplies such as ext. cords, USB cables, routers are the responsibility of the employee.

In District Travel:

Employees may, under certain circumstances, find it necessary to use their personal vehicles for travel in the performance of their duties. The rate of reimbursement is in accordance with GSA regulations for grant funding allocations and is reviewed by the Superintendent.

In-State Travel:

All in-state trips must have administrative approval, prior to traveling. This approval is requested on the leave request form. The business purpose of the trip must be justified, and all costs associated with the trip must be itemized, if reimbursement is expected. The school will process the reimbursement travel form only with sufficient approvals and required documentation such as agendas and invoices attached to the reimbursement request.

Out-of-State Travel:

All out-of-state travel requires prior approval by the Superintendent. The travel reimbursement form will be processed with sufficient documentation only and personnel will follow the same procedures as listed with in-state travel. If, in the event, personal vehicles are utilized, proof of insurance will be required and submitted to the school prior to the trip. All reimbursements through grant funding are processed in accordance with the Per Diem and Mileage act, as outlined in the GSA regulations. All receipts for out-of-pocket expenditures for transportation, registration, and miscellaneous expenses are required for reimbursement. Any meals and/or lodging cost included in the registration fee are deducted from the per diem reimbursement. All school employees are eligible for reimbursement of travel related expenses upon return from their approved trip but must submit reimbursement requests within 10 days of returning from the trip in accordance with the district's reimbursement plan. Any requests for reimbursement not made within this time frame are forfeited.

Home Office Expenses:

Some office expenses will be provided at EKAPS's expenses, such as phones. All supplies should be ordered through the office. Employees will not be reimbursed for supplies purchased individually unless they receive approval in advance from school administration.

EKAPS will provide each teacher with a laptop computer to use while employed with the school. The computer and any other supplemental devices will be maintained by the school. Employees will not be reimbursed for purchasing new equipment. Costs associated with computer maintenance must be preapproved by the Superintendent.

Cash Receipts:

All operational monies received are receipted in the school. All monies are receipted using pre-numbered receipts and are deposited into the school bank account within 24 hours, and according to the 24-hour rule.

The Finance Manager verifies all receipts posted as being deposited as part of the reconciliation of the bank account.

The school Finance Manager, under the supervision of the Superintendent, records all funds received in the school to the Financial Management System. The recording of these receipts is rotated by Office Personnel so that no one employee handles all receipts. Each receipt has a description of payment and has sufficient documentation for review by the IPA or Independent Public Accountant.

Prompt Logging of Cash Receipts:

All cash receipts, whether received electronically or in physical form, must be logged promptly into the school's accounting system by the Finance Manager.

- Receipts will be logged on the same business day they are received or, in the case of electronic funds transfers, monthly after funds are confirmed to have been deposited in the school’s bank account.
- The logging process includes recording the source of the funds, the amount, the date received, and the purpose of the payment (e.g., federal grant reimbursement, program income, etc.).

Documentation of Receipts:

For each receipt, the Finance Manager will generate a receipt log or record in the financial management system that includes:

- The source of the funds (e.g., federal agency, state agency).
- The amount received.
- The federal award information (ALN, FAIN, etc.).
- The date the funds were received.
- The purpose of the receipt (e.g., grant reimbursement, tuition, donations).

Verification and Review:

The Finance Manager will review all logged receipts on a monthly basis to verify their accuracy and confirm that all receipts have been entered into the accounting system. If discrepancies are identified between the physical receipts or bank deposit records and the entries in the accounting system, the Finance Manager will investigate and resolve the discrepancies promptly.

For monies received by ACH transfer and/or electronically, the same process is utilized, but the accompanying documents are generated by the bank and/or Public Education Department and attached as appropriate. The original Financial Management System receipt is attached to the documents posted and recorded into the Financial Management System. There is no need for a separate, manually written receipt.

Pre-Numbered Checks Requirement:

All disbursements, except petty cash or electronic funds transfers (EFT), must be made using pre-numbered checks to ensure that every transaction is uniquely identified and easily traceable in the accounting system. The checks will be ordered from a secure vendor, with check numbers recorded in the school’s financial management system to maintain an audit trail and supporting documents will accompany the checks submitted for signature by the Superintendent or check signers. For checks exceeding $5,000 or other sensitive transactions, both the Superintendent must be one of the signers.2 CFR §200.302; §200.302(b)(6)

Tracking of Check Numbers:

The Finance Manager is responsible for maintaining a log of all pre-numbered checks. The log must include the check number, the date of issue, the payee, the amount, and the purpose of the disbursement. Any voided or canceled checks must also be recorded and retained for audit purposes.

Reconciliation of Checks:

The Finance Manager will reconcile the check numbers on a monthly basis, ensuring that all issued checks are accounted for and that there are no missing or unauthorized checks.

Credit Card:

The Superintendent, Principal and Maintenance Manager are in possession of the company credit card and are responsible for all purchases on the card and for ensuring that the card is not used by unauthorized personnel. Card numbers may not be distributed and should not be saved in online accounts. The credit card must be used for business purposes only, and for purposes in conjunction with the employee's job duties.

The Finance Manager is responsible for receiving, printing, and retaining all receipts related to purchases made on the company credit card. If a receipt is lost, a written description of the items and cost of the purchase must be maintained and submitted in the same way a receipt would be maintained and submitted. Any purchases in the amount of $10,000 or above must be reviewed by the Finance Manager and Superintendent prior to purchase.

Donations:

As a public school, we are excited to have the community participate in providing necessary support to Explore Knowledge Academy of Public Speaking (EKAPS). Given that we are a responsible and accountable academic institution, we want to ensure that all processes and donations support the needs of our students/staff. With that, the process to acquire donations (ex: Donors Choose) is as follows:

- Staff members must talk with his/her supervisor about the need and request.
- Supervisor must give permission to the staff member before moving forward with the request.
- All donations (finances and/or material) must be delivered to the school for tracking purposes.
- Donations will be allocated to the staff members and/or students based on the goals of the request.
- All donations will be tracked for auditing purposes.

Accounts Receivable:

The accounts receivable system is maintained centrally. The Finance Manager is responsible for monitoring the collection of all amounts due from other departments and/or outside agencies inducting the Public Education Department. Invoices are prepared by the proper department and approved by the Superintendent.

Inventory:

Equipment, inventories, and other assets are secured physically, counted periodically and compared with amounts shown on control records. It is the responsibility of the Finance Manager or IT Manager to ensure that all equipment is appropriately marked. The IT manager is responsible for taking yearly inventory of all materials, computers, and supplies. The report is reviewed and approved by the Superintendent for final approval.

The Finance Manager maintains fixed asset inventory records. The inventory database includes the inventory tag number, a description of the item, the serial number, the purchase order number, the acquisition date, the fund code, the location number and the building room/department number and the site code.

Annual review of the current year's purchases is made by the Superintendent and the Finance Manager. All requests for removal of surplus property, deletions, and discards must be approved by the Board of Education if the amount is over $10,000. The school utilizes the forms provided by the Department of Finance and Administration for processing these items.

Audits are conducted periodically during the year by the Superintendent periodically to verify assets are correctly recorded and available for inspection.

Reporting:

Monthly reports are prepared and maintained by the school. The Superintendent and school Board review bank statements and a monthly reconciliation is performed by the Finance Manager. The Finance Manager then reconciles each fund's activities on a year to date basis to determine all adjustments have been made to the Financial Management System correctly. Any discrepancies are reported immediately to the Finance Manager for correction.

Segregation of Duties:

The main duties to be separated are the authorization to execute a transaction, the recording of the transaction, and the custody of assets involved in the transaction. Duties are divided so that no one person has complete control over a key function or activity. The Finance Manager is responsible for maintaining all accounts receivable records, receiving or handling incoming payments, and billing.

The Finance Manager is responsible for reconciling receivable records to the general ledger and Chart of Accounts.

A system of authorization and recording procedures shall be adopted by the school board and implemented by the school. Leadership will ensure that protection of the public trust is a major focus when granting the authorization to execute business of the school. Proposed transactions are authorized when they are consistent with policies, procedures, regulations, and laws.

- Sound accounting practices in performance of duties and functions shall be implemented to include varied error-checking routines that may be performed in connection with record keeping and by comparing recorded amounts with existing budgets. Appropriate action shall be taken with respect to any differences.

- Sequential numbering of receipts, checks, purchase orders, and vouchers either on pre-printed forms or by the financial accounting system as appropriate is required. Sequences should be examined to determine any skips in numbers or any duplicate numbers.
- Proper safeguards to protect unused checks and other pre-numbered forms, cash prior to deposit, and other receipts, and facsimile signature plates shall be in place.
- Transactions shall be properly recorded on a timely basis in order to permit preparation of financial statements in conformity with Generally Accepted Accounting Principles (GAAP). In addition, schools shall establish any other criteria applicable to such statements to maintain accountability for assets.
- Independent performance checks and proper valuation of recorded amounts such as clerical checks, reconciliations, comparison of assets with recorded accountability, computer- programmed controls, management review of reports that summarize the detail of account balances, and user review of computer-generated reports will be performed.

Vendors:

Explore Knowledge Academy of Public Speaking (EKAPS) has contracted with vetted and approved vendors. Only approved vendors, determined to meet the criteria set forth in the EKAPS annual notification of FERPA rights for a school official and have ensured a legitimate educational interest in educational records are allowed to partner to provide services. Suspended/Disbarments vendors are reviewed through Sam.gov (Exclusions).

Subcontractors:

To ensure that contractors are "in good standing" the minimum requirement is to ensure that they are in good standing with the Secretary of State. Businesses will be vetted via SilverFlume.

Subcontractors include but are not limited to general contractors hired to fix the school building, vendors hired to provide professional development or consultant firms hired to rework IT infrastructure. In part, this applies to businesses and individuals operating as a business.

Vendors – Sole Suppliers:

In the interest of ensuring quality, reliability, and timeliness, EKAPS may establish purchase agreements or contracts with main dealers of regularly purchased goods. Where possible due to other factors, the Superintendent or Finance Manager will negotiate rates and discounts with the supplier or a method to determine price for invoice justification. These agreements and prices (net of discounts) should be reviewed annually to ensure that they are competitive. All costs will be tax exempt. As applicable, criteria essential for choosing vendors include the following:

Price, availability of goods/services, warranties, ongoing support with product/service, SAM review, payment terms.

Vendor – Payment Processing:

The Finance Manager will receive W-9s prior to payment authorization from the Superintendent. The Finance Manager is responsible for preparing payment requisition, and then forwarding that to the Superintendent or Check Signer for checking and certifying. All payments must be made in accordance with the contractual terms between the vendor and EKAPS financial policies. Goods/services must be certified completed/received satisfactorily before payment is complete. This includes the Finance Manager's verifying receipt of goods/services and as applicable maintaining proof of receipt for tangible goods.

2. FINANCIAL REPORTING

EKAPS's financial management system must be capable of producing accurate and timely financial reports that meet the specific requirements of each federal award. Reports must include both financial performance and compliance with grant terms.

Monthly Reporting and Reconciliation

Financial reports will be generated monthly and reviewed by the Finance Manager and presented to the school board to ensure alignment with budgeted costs. Financial reports must reconcile with the accounting records to ensure accuracy and completeness.

- *Matching Transactions:*
    - The reconciliation process involves comparing:
        - Grant expenditures: All purchases, services, salaries, and other expenses funded by federal grants.
        - Grant revenues: Amounts disbursed to the school by federal or state agencies.
    - Ensure that expenditures and revenues recorded in the school's accounting system align with what the SPCSA has recorded.
        - Identifying Discrepancies:
    - If there are discrepancies between the school's records and the SPCSA records, the Finance Manager is responsible for identifying the source of the discrepancy.
    - Discrepancies may arise due to timing differences, recording errors, or missed transactions.
        - Resolving Discrepancies:
    - For identified discrepancies, the Finance Manager must investigate the source of the issue, which could involve:
        - Reviewing individual transactions.
        - Checking invoices, purchase orders, and receipts.
        - Communicating with the SPCSA to clarify any differences.
    - Discrepancies should be corrected promptly in the accounting system to ensure the accuracy of financial reporting.
- *Approval and Verification:*
    - Once the reconciliation is complete, the Finance Manager reviews the reconciliation report to verify accuracy and completeness.

- The Superintendent is responsible for the final verification, review and sign-off on the reconciliation report, ensuring that any identified issues have been resolved.

- *Reconciliation Frequency:*
  - Reconciliations should occur monthly for grant awards with high transaction volume and quarterly for those with fewer transactions.
  - The Superintendent and Board of Directors will review the reconciliation reports on a quarterly basis to ensure compliance with federal requirements.

3. MAINTENANCE OF ACCOUNTING RECORDS/ BUDGET MAINTENANCE

A general ledger will be used to summarize, on a year-to-date basis, all accounting transactions. The accounting transaction will be classified according to the chart of accounts and account descriptions. Posting to the general ledger will be made automatically from the books of original entry. An accrual basis of accounting is in use. Manual journal entries will be written to record accounting transactions, which cannot logically or practically be entered in the other books of original entry. These transactions will include year-end accruals, corrections or previously recorded transactions, depreciation, etc.

The budget ledgers are maintained in the financial management system used in concert with the cash balance and encumbrances to ensure that all spending is in accordance with budget authority. While budget object lines may be temporarily overspent, budget functions may not be overspent.

All Operating Budget increases, decreases, and adjustments to the Operating Budget are presented to the school board for approval and then submitted to the State Public Charter Authority and Nevada Department of Education.

Verification of Expenditures and Revenues:

The Finance Manager verifies that all transactions comply with the cost principles outlined in 2 C.F.R. Part 200, ensuring expenditures are necessary, reasonable, and allocable to the grant. If discrepancies are identified during reconciliation (e.g., a transaction recorded in the accounting system that does not appear in the SPCSA records), the Finance Manager will gather additional documentation or clarifications.

Grant Budget Revisions

In alignment with 2 CFR § 200.308, revision of budget and program plans may be necessary. The revision will reflect the School Performance Plan action steps, strategies, and goals in accordance with input from the Continuous Improvement Team as a result of the Continuous Improvement Plan (CIP) process. Weekly grant funding updates will be discussed between the Superintendent and the Finance Manager.

PAYROLL MANAGEMENT

The Finance Manager and HR Payroll Manager are responsible for monitoring the hiring of personnel, authorizing salaries, initiating employment contracts, and maintaining the staffing levels approved in the annual budget. The Superintendent and Finance Manager verify that the budget is available for any staffing increases. All information is transferred to the Payroll system. All payrolls are processed from the approved employment documents. All additional payrolls are processed by exception and only with proper authorization from the

Superintendent, or the school board. These payroll payments can include substitutes, increments and/or additional services such as stipends and enrichment.

Payroll Compliance:

The school will comply with all federal payroll regulations, including requirements for timely payment of wages, maintaining accurate payroll records, and providing employees with appropriate payroll statements.

Payroll Statements:

Employees compensated with federal funds will receive regular payroll statements that detail the hours worked, rate of pay, gross wages, deductions, and net pay.

Payroll statements will clearly identify the portion of compensation that is funded by federal grants, ensuring transparency and compliance with federal regulations.

Time and Effort Reporting:

All employees whose salaries are paid in whole or in part with federal funds must complete time and effort reports that reflect the actual time spent on federal programs. These reports will be reviewed and certified by HR Payroll Manager and Finance Manager.

Reconciliation of Payroll Costs:

The payroll system will be regularly reconciled with the time and effort reports to ensure that charges to federal grants are accurate and appropriately documented.

Discrepancies identified during reconciliations will be investigated promptly, and corrections will be made in a timely manner.

Segregation of Duties:

Responsibilities for payroll preparation, authorization, disbursement, and reconciliation will be segregated among different personnel to minimize the risk of errors or fraud.

Training:

Personnel involved in payroll processing and management of federal funds will receive ongoing training to ensure they understand and comply with federal payroll requirements.

Internal and External Audits:

Regular internal audits and periodic external audits will be conducted to ensure payroll processes comply with federal requirements and that corrective actions are implemented for any identified issues.

Record Retention:

All payroll records, including payroll statements, time and effort reports, and reconciliations, will be retained for at least five years or as required by the federal program guidelines.

Absences:

Employees must report all emergency sick leave to the HR Payroll Manager and notify their proper supervisors. All advance notice Time off requests must be entered into the Payroll system by the employee, which is then approved by the HR Payroll Manager and documented for Administration.

INDIRECT COSTS

Indirect Costs are costs that cannot be specifically identified with a specific product or service but can bear relationship to or result from a product or service. The Superintendent and Finance Manager will clearly define indirect costs pools. The Superintendent in collaboration with the Finance Manager will clarify those products/services. Indirect costs or overhead rates are defined in Federal, State and Local grants and contracts should be applied according to the terms of contracts.

Indirect costs may include space rental, utilities, postage, data processing, management and control, miscellaneous supplies and materials, reports, and safety management inspection and training. Although the former is not an exhaustive list, the indirect cost pool includes costs that benefit cost recoverable and non-cost recoverable work.

Approved Indirect Cost Rates:

Explore Knowledge Academy of Public Speaking (EKAPS) will only charge indirect costs to grants using the approved indirect cost rates as determined by the cognizant federal or state agency. The rates will be documented in the grant agreement or approval letter.

Application of Indirect Costs:

Indirect costs will be calculated and applied to the grant expenditures in accordance with the approved indirect cost rate and the applicable base (e.g., modified total direct costs) as defined by the grant agreement. The Finance Manager is responsible for ensuring that indirect costs are calculated correctly and charged consistently with the approved rate and terms of the grant.

EMPLOYEES – GRANT FUNDED POSITIONS

TRAINING

All employees funded, in whole or in part, by grants, upon hiring, are trained in the role as outlined in the grant narrative. Employees also understand that it is possible to be subject to immediate termination if the grant funding ceases. No employee who is in such a position may file a grievance over the termination of the position. As a condition of employment, employees are hired only for the duration of the grant for which they work and benefit from the rights provided to all employees. If the grant expires, employees will be given sufficient notice to apply for alternative positions within or outside the company.

SALARY/PAY

Positions funded by grants are comparable to similar positions not funded by grants and are based on employee experience, education, or combination of the two. The Superintendent approves the final placement of all employees on the salary schedule.

Grant Application and Review

Completed applications are submitted through the Grant Management System, according to instructions contained in the Request for Proposal (RFP). The SPCSA's review process includes:

- A program review to ensure that proposed activities reflect program guidelines and are appropriate and measurable. For competitive grants, the program review must also include the kind of careful analysis that will enable the reviewers to rank proposals in comparison to others
- A technical review to ensure that the grant has been completed accurately and appropriately; and
- A legal or regulatory review to determine financial and administrative, as well as programmatic compliance, with the relevant laws, regulations, and policies.

APPROVAL AND OBLIGATIONS

A charter school cannot begin to obligate funds until it receives notification of its allocation amount from the SPCSA. Obligations mean orders placed for property and services, contracts and subawards made, and similar transactions during a given period that require payment by the non-Federal entity during the same or a future period.

REIMBURSEMENTS

All disbursements of federal funds, whether made by the SPCSA or the charter school, are made by reimbursement. This means that once an obligation is made, the charter school must use its own funds to meet the obligation. Then, the charter school may submit a reimbursement request to the SPCSA through the Grant Management System (GMS).

Reimbursements are submitted by the 15th of each month for each grant allocation. The Superintendent and Finance Manager support the tracking and spend down of these funds. The Finance Manager ensures timely and accurate submissions. Once reimbursement is received the Finance Manager updates receipt in Chart of Accounts.

At the SPCSA, staff will review the reimbursement request and accompanying documentation to ensure that:

1. the purchase conforms with the applicable federal allowability rules
2. the purchased goods or services align with the charter school's budget; and
3. the correct documentation is included

Explore Knowledge Academy of Public Speaking (EKAPS) Reimbursement Process

Planning - The Superintendent and Principal review school needs and alignment to school improvement goals. The Superintendent ensures the grant narrative is reviewed for what is allowable, reasonable and necessary.

Research – School Improvement Team provides input regarding suggested items to be purchased with grant narrative. The Superintendent and Finance Manager review the suggestions and approve.

Execution – The Finance Manager looks for best prices and requests quotes, if needed. Then they create the P.O. to include funding program, price, quantity & fiscal year. Purchases are placed.

Tracking - Items are received and checked in by the Office Personnel. Finance Manager checks in the items and creates packets to include P.O. proof of purchase, and Packing Slips. The Finance Manager then updates the inventory spreadsheet.

Monitoring – The Finance manager ensures that grants tracking spreadsheet and inventory spreadsheet are in alignment. The Superintendent and Finance Manager ensure funds are spent down throughout the fiscal year. Submission and Alignment – The Finance Manager completes monthly grant submission as applicable and supplies supplemental documents as needed. The Finance Manager also reviews and completes submission and ensures reimbursement are reflected in the budget.

EKAPS will ensure the following documentation for the expend of funds awarded under grants or for requesting reimbursements:

Purchases - Finance Manager

- Invoice, Purchase Order, and Proof of Payment
- Evidence that supplies/equipment has been received and inventoried
- Varied quotes to ensure due diligence of funds (if over $500)
- PERS 502 and 503 Forms and Bank statements

Salaries/Benefits - HR Payroll Manager

- Payroll register (Reconciliation Reports)
- Employee Payroll Check (proof of payment)
- Stipends – EKAPS Stipend Reimbursement Spreadsheet

Time/Effort - HR Payroll Manager

- Payroll register
- Employee Payroll Check
- Time/Effort documentation/tracking
- Stipends

Contracted Services/Professional Development - Finance Manager

- Invoice, Purchase Order, and Proof of Payment
- Staff Accounting (i.e., sign-in sheet) or Training materials/agendas (if applicable)

Travel & Lodging & Meals - Finance Manager

- Invoice, Receipts, and Proof of Payment

- Per Diem Rates for Meals and Lodging https://www.gsa.gov/

Stipend Reimbursement Tracking - HR Payroll Manager and Finance Manager

The EKAPS Stipend Reimbursement Spreadsheet contains the following:

- Timestamp of school administrator submission
- Payroll date confirmed by HR Payroll Manager
- Employee Names
- Grant Funding Source by Finance Manager
- Stipend Reimbursement Amount
- Submission Month

Monitoring and Compliance:

The Finance Manager will monitor indirect cost charges regularly to ensure they do not exceed the approved rate and are applied only to allowable costs as per federal regulations. Regular reviews will be conducted to verify that the indirect costs are allocated accurately and appropriately.

Information And Communication:

Pertinent information must be identified, captured, and communicated in a form and time frame that enables personnel to carry out their responsibilities. The Financial Management System (FMS) generally produces reports containing operational, financial, and compliance related information recorded on a cash basis of accounting, making it possible to efficiently manage the cash functions of the school. Schools should understand the differences and management implications inherent in these statements.

The accounting system consists of the methods and records established to identify, assemble, analyze, classify, record, and report a school's transactions and to maintain accountability for the related assets and liabilities. An effective accounting system considers establishing methods and records that will:

- Identify and record all valid transactions.
- Describe transactions in sufficient detail and on a timely basis to permit proper classification of transactions for financial reporting.
- Measure the value of transactions in a manner that permits recording their proper monetary value in the financial statements.
- Determine the time period in which transactions occurred to permit recording of transactions in the proper accounting period.
- Present proper transactions and related disclosures in the financial statements.

Sources outside of Explore Knowledge Academy of Public Speaking (EKAPS) may provide valuable information for the school to use in verifying their reports. These sources may include but are not limited to vendors, auditors, and third-party auditors. Information such as vendor statements, reports, and auditors' analysis are useful tools.

4. INTERNAL CONTROLS/AUTHORIZATIONS

No single person should have control over all aspects of a financial transaction. Segregation of duties reduces the risk of errors and fraud by ensuring that multiple people are involved in the key functions of authorization, recording, and reconciliation.

Segregation of Duties

- Superintendent:
  - Authorization of Transactions: The Superintendent should have the authority to approve large or significant transactions, including payroll, contracts, and capital expenditures. However, the Superintendent should not be involved in recording or reconciling those transactions.
  - Oversight and Review: The Superintendent should regularly review financial reports and reconciliations but not prepare them.
  - Budget Approval: The Superintendent is responsible for reviewing and approving the budget, but the creation of the budget should involve input from the Finance Manager.
- Finance Manager:
  - Initiation and Preparation of Transactions: The Finance Manager should be responsible for initiating transactions such as purchase orders, vendor invoices, and expense reports.
  - Payroll Management: The Finance Manager may process payroll and maintain payroll records but should not approve payroll disbursements.
  - Recording and Posting of Transactions: The Finance Manager should be responsible for recording financial transactions in the accounting system. This includes entering data and ensuring that all transactions are correctly coded.
  - Reconciliation of Accounts: The Finance Manager should reconcile bank accounts, credit card statements, and general ledger accounts regularly.
  - Financial Reporting: The Finance Manager prepares financial reports for the Superintendent’s review and ensures all reports are accurate and timely.

Authorization Controls

- Transaction Authorization:
  - The Superintendent: The Superintendent should be required to authorize significant or high-value transactions (e.g., above a set threshold such as $5,000 or higher). This includes approval of large purchases, contracts, and expense reimbursements for senior staff.
  - Dual Authorization for Transactions: For all transactions, both the Superintendent (if available) and an approved check signer should authorize the transaction to ensure proper oversight. Two approved check signers may sign the check if the Superintendent is not available.
- Purchase Order and Payment Process:

- Finance Manager: Prepares and submits purchase orders or invoices for payment. The Finance Manager verifies that goods/services have been received but does not authorize the payment.
- Finance Manager: Reviews the documentation and records the transaction but does not have the authority to authorize the payment.
- Superintendent: Approves the payment for significant purchases and expenditures over the pre-defined limit.

- Payroll Authorization:
  - HR Payroll Manager: Prepares and processes payroll but should not have the authority to release payroll payments.
  - Superintendent: Authorizes payroll payments and approves any changes to payroll amounts (e.g., salary increases, new hires, terminations).
  - Finance Manager: Reconciles payroll reports with the general ledger but does not authorize payroll disbursements.

Other Key Internal Controls

- Access to Financial Systems:
  - Restricted Access: Only the Finance Manager and Superintendent should have access to the accounting system to post transactions, and permissions should be tailored based on roles.
  - Audit Trail: The accounting system should maintain an audit trail that logs who accessed, recorded, or modified financial data.
- Bank and Credit Card Reconciliation:
  - Monthly Reconciliation: The Finance Manager should reconcile bank statements and credit card statements monthly. These reconciliations should be reviewed and verified by the Superintendent.
  - Separation of Cash Handling: If the Finance Manager handles incoming cash or checks, they should not be responsible for reconciling the cash account.
- Budget Monitoring and Review:
  - Monthly Review: The Finance Manager should prepare monthly budget reports for review by the Superintendent to ensure expenditures are within the approved budget.
  - Variance Analysis: The Superintendent should lead the review of any budget-to-actual variances to investigate significant discrepancies and take corrective actions as needed.
- Expense Reimbursements:
  - Finance Manager: Prepares and submits expense reimbursement requests for review.
  - Superintendent: Approves reimbursement requests for the Finance Manager and any staff.
  - Finance Manager: Verifies the reimbursement request before it is processed but does not approve payment.
- Financial Reporting to the Board:

- Finance Manager: Prepares monthly and quarterly financial reports, including budget-to-actual comparisons and cash flow reports.
- Finance Manager : Reviews reports before they are presented to the Board of Directors and provides any necessary context or explanations for variances.
- Board Treasurer: Provides oversight, reviews the reports, and asks for clarification as needed to ensure financial health and accountability.

5. BUDGET CONTROL

Chart of Accounts

The Nevada Department of Education (NDE) is required by Nevada Revised Statutes (NRS) 387.3035 to develop a uniform system of budgeting and accounting which provides for the separate reporting of expenditures for each school district and school within a school district. Once the uniform system of budgeting and accounting has been adopted by the State Board of Education (SBE) it is mandatory for all public schools in the state. In addition, Nevada Administrative Code (NAC) 387.765 requires all charter schools and university schools for profoundly gifted pupils use the chart of accounts prescribed by the Department. See compliance requirements below.

NDE Chart Of Accounts

Explore Knowledge Academy of Public Speaking (EKAPS) prepares and adopts an annual budget in accordance with Nevada Statutory requirements. The Operating Budget is prepared under the supervision of the Superintendent and the Finance Manager, with actual expenditures compared to budgeted amounts monthly. The Community Council and Board of Directors make recommendations regarding budgetary issues, including site - based allocations, and staffing. The Superintendent monitors all staffing and compares all positions to student class loads. These decisions are reviewed by administration, Human Resources, and the school board before being finalized by the Community Council. The Operating Budget is reviewed for technical accuracy and approved by the school board. The approved and certified budget constitutes the Operating Budget, which is authorization for the school to begin operations for the fiscal year.

Final Cash Balances

Upon completion of the final close for each fiscal year, Explore Knowledge Academy of Public Speaking (EKAPS) determines the actual cash balances for all funds and reports them to the Nevada State Public Charter School Authority and Nevada Department of Education by the designated deadline. Upon approval, the school will adjust the budget and incorporate the changes into the Financial Management System.

Grant Budget Revisions

In alignment with 2 CFR § 200.308, revision of budget and program plans may be necessary. The revision will reflect the School Performance Plan action steps, strategies, and goals in accordance with input from the Continuous Improvement Team as a result of the Continuous Improvement Plan (CIP) process. Weekly grant funding updates will be provided by the Finance Manager during leadership team meetings.

6. CASH MANAGEMENT

Explore Knowledge Academy of Public Speaking (EKAPS) complies with cash management requirements during the administration of federal programs, as mandated by federal regulations, including but not limited to the U.S. Department of Education's regulations under 2 CFR Part 200 (Uniform Guidance).

Segregation of Duties:

To prevent fraud, waste, and abuse, the school will implement a segregation of duties among personnel who handle federal funds. No single individual should have control over all aspects of any financial transaction.

Cash Drawdowns:

The school will minimize the time between receiving federal funds and their disbursement. Drawdowns of federal funds will be timed to coincide with the actual, immediate cash needs for carrying out the program or project. Excessive cash-on-hand will be avoided to comply with federal regulations.

Bank Account Management:

All federal funds will be deposited into a dedicated bank account that is separate from the school's general operating funds. This account will be maintained by the school's financial office to ensure transparency and traceability of federal funds.

Logging of Receipts and Reconciliation:

- Receipt of Funds: The Finance Manager logs all receipts in the cash receipt log and prepares daily/weekly deposits.
- Reconciliation: The Finance Manager ensures that recorded receipts match bank deposits and performs monthly reconciliations.
- Monitoring: The Finance Manager tracks cash flow to ensure compliance with federal regulations and reports discrepancies to the Superintendent.
- Verifications: The Superintendent will verify there are no discrepancies.

Financial Reporting:

The school will comply with all federal reporting requirements. Financial reports will be prepared and submitted in a timely manner to the appropriate federal agencies, reflecting the actual use of funds in accordance with the terms of the grant or contract.

Internal Controls:

The school will establish and maintain internal control systems that provide reasonable assurance that federal awards are managed in compliance with all applicable federal statutes, regulations, and terms and conditions of the award. This includes regular audits and reviews by both internal and external auditors.

Training:

Personnel responsible for handling federal funds will receive ongoing training on federal cash management policies, regulations, and best practices to ensure compliance and mitigate risks.

Documentation and Record Retention:

All transactions involving federal funds will be fully documented. Records will be maintained for a minimum of five years after the end of the grant period, or as specified by federal regulations.

Audit Compliance:

The school will comply with the Single Audit Act, as applicable, and ensure that any audit findings are promptly addressed and corrective actions are implemented to prevent future noncompliance.

CASH DRAWDOWNS

Establishing Need for Drawdowns:

Before drawing down funds, the Finance Manager will review the projected expenditures for the grant program to determine the actual cash needs. Only the amount required for immediate disbursement or reimbursement will be requested. Documentation supporting the need for each drawdown will be maintained, including invoices, payroll records, contracts, and other evidence of allowable costs. All drawdowns of grant funds must be approved by the Superintendent.

Reconciliation of Drawdowns:

The Finance Manager will reconcile all drawdowns against actual expenditures monthly. Any discrepancies between drawdowns and expenditures will be promptly identified, documented, and corrected.

7. COST ALLOWABILITY

The school ensures compliance with federal guidelines pertaining to the treatment of costs on sponsored project activities. 2 CFR 200.302 (b)(7)

Allowable Cost

A cost that is Allowable must also be:

- Necessary and Reasonable for the performance of the award and be Allocable.
- Conform to any award limitations or exclusions.
- Consistent with policies and procedures that apply to both Federal and other non-Federal activities.
- Not included as a cost or used to meet cost sharing or matching requirements of any other federally financed program in either the current or a prior period.
- Adequately documented.

Reasonable Costs

Typical tests to determine if a cost is Reasonable:

- Whether the cost is necessary for the proper and efficient performance or administration of the program.
- Whether the cost complies with restraints or requirements imposed by Federal, state and other laws and regulations, and terms and conditions of the Federal award.

- Market prices for comparable goods or services for the geographic area.

EKAPS will maintain written documentation supporting the review and approval of all costs charged to federal awards. This process ensures that costs meet the reasonable, necessary, and allocable criteria, as required by 2 CFR §200.402(b)(7), §200.403, and §200.405.

COST REVIEW PROCESS

- Pre-Expenditure Review:
  - Before incurring a cost, the Superintendent and Finance Manager must review and evaluate whether the cost is reasonable, necessary, and allocable to the federal award. The Superintendent and Finance Manager will conduct market research, as needed, to ensure that costs are in line with prevailing market rates and do not exceed what a prudent person would incur for similar purposes.
- Cost Allowability Assessment:
  - All costs must be evaluated against the criteria outlined in 2 CFR §200.403 and the specific terms of the federal subaward to confirm compliance. Each cost must directly contribute to the achievement of the objectives outlined in the federal award. Costs that are not essential to the project's success will be considered unnecessary and therefore unallowable.
- Written Justification:
  - If the allowability of a cost is not immediately clear, a written justification must be prepared to document the reasoning behind incurring the cost, including how it benefits the federal program and meets the requirements of the award.

ALLOCABILITY OF COSTS

- Proportional Allocation:
  - Costs must be allocated in proportion to the benefits received by the federal program. Shared costs that benefit multiple projects must be distributed according to the actual benefits each project receives.
- Documentation of Allocation:
  - EKAPS must maintain detailed records that justify how each shared cost is allocated across multiple programs or activities.

REGULAR PREPARATION OF STATEMENT OF FINANCIAL POSITION

Frequency of Preparation

The Finance Manager is responsible for preparing the Statement of Financial Position on a monthly basis to provide an accurate representation of the school's assets, liabilities, and net position at a specific point in time. The statement must be prepared within 20 business days following the close of each month and within 30 days following the close of the fiscal quarter.

Financial Reporting Compliance

The Statement of Financial Position will include detailed reports of the school's financial standing, including current and non-current assets, liabilities, and net assets, to ensure compliance with 2 CFR §200.328 and §200.329.

The financial position reports must provide a clear snapshot of the school's financial health, and any changes to assets and liabilities must be accurately reflected.

REVIEW BY CHARTER HOLDER ADMINISTRATOR

Monthly Review by Charter Holder Administrator

After preparation, the Finance Manager will submit the Statement of Financial Position to the Superintendent for review.

The Superintendent is responsible for ensuring that the financial position accurately reflects the school's financial standing, verifying the accuracy of reported figures, and flagging any discrepancies or concerns.

Review Process

The Superintendent will review the Statement of Financial Position for:

- Accuracy and completeness of asset and liability entries.
- Consistency with prior months' financial reports.
- Compliance with the school's financial policies and federal grant requirements.

Any discrepancies or potential financial risks identified during the review will be addressed promptly in consultation with the Finance Manager.

Approval of the Financial Position

After the review, the Superintendent will either approve the Statement of Financial Position or request corrections before final approval.

MONTHLY REVIEW BY GOVERNING BOARD

The Finance Manager will present the Statement of Financial Position to the Community Council and Governing Board on a quarterly basis, at a minimum.

The quarterly review allows the council and board to monitor the school's financial health, assess any changes in financial standing, and ensure alignment with budgetary expectations and compliance with grant requirements.

Annual Review

At the end of the fiscal year, a comprehensive review of the school's financial position will be conducted, including a full year-to-date Statement of Financial Position.

The Governing Board will conduct the annual review, which includes examining the year-end financial statement for any significant changes in assets, liabilities, or net assets, and ensuring that the school's financial management adheres to both federal and state financial reporting standards.

MONITORING AND REPORTING

Explore Knowledge Academy of Public Speaking (EKAPS) must establish monitoring procedures to track the financial condition of the school regularly. The monthly and quarterly preparation and review of the Statement of Financial Position are essential to fulfilling this requirement.

The Finance Manager and Superintendent must ensure that financial reporting aligns with federal requirements and provides accurate updates on the school's financial performance.

REPORTING PERFORMANCE AND FINANCIAL STATUS

The school must provide accurate and timely financial reports to ensure the federal awarding agency receives performance data. This includes regular internal review and external reporting to ensure the financial statements are aligned with the objectives of any federal grants received.

ACCOUNTABILITY AND DOCUMENTATION

Documentation Retention

All Statements of Financial Position, along with supporting documentation, will be retained for a minimum of three years in accordance with federal and state regulations. These records must be accessible for audits or reviews. The Finance Manager is responsible for maintaining a clear audit trail of the preparation and review process.

Corrective Actions

If any issues or discrepancies are identified during the review process, the Superintendent and Finance Manager will collaborate to take corrective actions. Any significant issues will be reported to the Governing Board and addressed as part of the school's overall financial management plan.

GRANT FUNDING ACCOUNTING

At the onset of each year, grant funding will be reviewed in alignment with the budget summary page and budget allocations as noted through the Grant Management System (GMS). Additionally, EKAPS under the direction of the board of directors will ensure monthly accounting procedures as established as best practices as outlined below.

The school's Finance Manager must provide:

- accurate, current, and complete disclosure of the financial condition of each federal aid program.
- records that adequately identify the source and application of funds for sponsored activities and contain information on institutional awards, authorizations, obligations, unobligated balances, assets, income, liabilities, revenues, expenditures, and cash disbursements.
- effective control over and accountability for all funds, property, and other assets, including adequate safeguarding of all such assets to ensure that they are used solely for authorized purposes.
- comparison of actual expended amounts with amounts budgeted for each program.

- procedures to ensure the timely, efficient transfer of funds when they are advanced through electronic methods (these procedures must limit the time between the transfer of funds from the U.S. Treasury and cash disbursement by the school to students so that funds are disbursed no later than three business days following the receipt of funds, and do not result in excess cash.)
- procedures according to the applicable terms of the grant program for determining reasonableness, allowability, and allocability of costs.
- accounting records that are supported by audit trail documentation.
- monthly reconciliation of individual grant awards as recorded in the school's accounting system
- examinations in the form of external or internal audits, which must be made according to generally accepted auditing standards and government auditing standards.

The school's accounting system includes those procedures that deal with the organization and controls necessary to identify and record transactions in a school's journals and ledgers, while systematically providing for the supporting documentation for all journal entries. The accounting system is a subset of the school's larger system of financial management

F4: PROCUREMENT METHODS AND COMPLIANCE

At EKAPS, we ensure that our procurement processes align with federal regulations, specifically adhering to 2 CFR Part 200. Below is an outline of the rationale and procedures EKAPS follows when selecting appropriate procurement methods.

Rationale for Method of Procurement

EKAPS documents the reasoning behind each procurement method chosen. This ensures that the method selected is appropriate for the size, scope, and complexity of the contract. We maintain detailed records to justify the procurement method and ensure compliance with federal guidelines.

Informal Procurement Methods (Purchases Below the Simplified Acquisition Threshold, $250,000)

- Micro-Purchases (up to $10,000):

  For smaller purchases, EKAPS does not require competitive quotes but ensures that prices are reasonable. We distribute purchases equitably among qualified suppliers to foster fairness and competition.

- Small Purchases (Above $10,000 and Below $250,000):

  For small purchases, EKAPS uses informal procedures to obtain price or rate quotations from an adequate number of qualified sources, typically two to three quotes, ensuring that we are getting competitive pricing for the school.

- Before entering into contracts equal to or exceeding $25,000, the school must verify that vendors and contractors are eligible to receive federal awards. This verification is done by checking the System for Award Management (SAM) to ensure the vendor is not debarred, suspended, or otherwise excluded from participation in federal programs.

Formal Procurement Methods (Purchases Above the Simplified Acquisition Threshold)

- Competitive Proposals (Request for Proposals - RFP):

When factors beyond price need to be considered (such as qualifications or technical expertise), EKAPS uses competitive proposals. A public solicitation process is followed, and evaluation criteria are used to select the best vendor. Negotiations are allowed to finalize contract terms.

Noncompetitive Procurement Methods (Sole Source Procurement)

EKAPS uses noncompetitive procurement methods under very specific circumstances, which include:

- The item or service is only available from a single source.
- A public emergency situation requires immediate procurement.
- The federal awarding agency or pass-through entity specifically authorizes noncompetitive procurement.
- After reasonable solicitation efforts, competition is determined to be inadequate.

In these cases, EKAPS documents the justification for using a noncompetitive method to ensure compliance with applicable federal requirements.

Drug-Free Workplace Certification (Section 2.030)

Procurement procedures must comply with the Drug-Free Workplace Act. Before executing contracts, vendors and contractors must provide a Drug-Free Workplace Certification, ensuring that they maintain a workplace free of drugs as required by Section 2.030 of state law.

Use of Minority, Women's, and Small Businesses (§200.321)

EKAPS actively seeks to involve minority-owned, women-owned, and small businesses in procurement activities. We strive to provide opportunities for these businesses to participate directly in our procurement or by encouraging prime contractors to subcontract with them when feasible.

Procurement of Recovered Materials (§200.322)

EKAPS follows environmentally responsible procurement practices by purchasing products that include recovered materials, as outlined in the Environmental Protection Agency's guidelines, whenever feasible and cost-effective.

PROHIBITION OF CONFLICTS OF INTEREST

All employees and officials involved in the procurement process must avoid any actual or perceived conflicts of interest. Conflicts of interest arise when an employee or official, or their immediate family members, has a financial or other interest that could improperly influence the outcome of procurement activities.

<u>Specifically:</u>

- Employees or officials may not participate in the selection, award, or administration of a contract if they, their family, or business partners have a financial interest in the vendor or contractor being considered.
- Employees or officials must disclose any potential conflicts of interest in writing to the Superintendent or Finance Manager before participating in any procurement activities.
- Employees and officials involved in procurement activities must not solicit or accept gifts, gratuities, favors, or anything of monetary value from vendors, contractors, or parties seeking to do business with EKAPS.
  - Items of nominal value (such as pens, calendars, or promotional items with minimal value) may be accepted, provided they do not influence procurement decisions.

Full and Open Competition (§200.319)

Our procurement procedures are designed to promote full and open competition. EKAPS avoids restrictive practices such as:

- Unreasonable requirements on vendors to qualify.
- Unnecessary experience or bonding.
- Noncompetitive pricing practices between affiliates.

To ensure transparency and compliance, EKAPS maintains detailed records documenting the rationale for selecting procurement methods, contract types, contractor selection or rejection, and the basis for determining contract prices.

Disciplinary Actions for Violations:

EKAPS will take immediate and appropriate action in the event of a violation of this Code of Conduct. Disciplinary measures may include, but are not limited to:

- Written warnings for minor infractions.
- Suspension or termination of employment for serious or repeated violations.
- Referral to legal authorities in cases where violations of law, such as bribery or fraud, are suspected.

CONTROL ACTIVITIES AND PROCUREMENT

All purchases are made in accordance with EKAPS's charter school are located at Nevada Revised Statutes Section 332.039 - .148 Controls Policy and 2 CFR 200.320. The State of Nevada's purchasing laws for local governments, which apply to:

Purchases

All assets meeting the definition of a fixed asset shall be considered a long-term asset and shall be recorded in EKAPS's Inventory log. Fixed assets can be categorized into the following, but not limited to: Land Improvements and Construction, Buildings/Facilities Leases, Equipment, Books, Computer Software costing more than $5,000, and Meals/Refreshments, as applicable.

Direct costs

Direct costs include, but are not limited to, salaries, stipends, retirement benefits, travel, equipment, and supplies directly benefiting the grant- supported project or activity in accordance with 2 CFR 200.430, 2CFR 200.431, and 2 CFR 200.475 (b).

Salaries/Benefits

All salaries and wages charged to Federal awards must be supported by EKAPS's Internal Control Policy that provides reasonable assurance that the personnel costs incurred are accurate, allowable, and properly allocated.

Stipends

All awarded stipends charged to Federal awards are in alignment with 2CFR.200.430 and supported by EKAPS's Internal Control Policy that provides reasonable assurance that the personnel costs are accurate, allowable and allocated.

Contracted Services/Professional Development

EKAPS utilizes personalized professional development that includes ongoing and job-embedded activities that help educators become more effective and apply what they have learned to improve instructional practice.

Travel & Lodging & Meals

Travel reimbursements allocable to grant funding must be approved in accordance with the instructions as outlined in the State Administrative Manual (SAM) and the U.S. General Services Administration (GSA) rates.

Federal Compliance: Suspension and Debarment

Annually, the Finance Manager reviews to certify that EKAPS is not suspended or debarred and/or listed on the System for Award Management (Sam.Gov) and prohibited from receiving a subaward of federal funds in accordance with the following 28 C.F.R. pr. 67 § 67.510.

Vendors

Explore Knowledge Academy of Public Speaking (EKAPS) has contracted with vetted and approved vendors. Only approved vendors, determined to meet the criteria set forth in the EKAPS annual notification of FERPA rights for a school official and have ensured a legitimate educational interest in educational records are allowed to partner to provide services. Prior to awarding any contract, the designated staff must check the potential contractor's status to ensure they are not suspended or debarred. Suspended/Disbarments vendors are reviewed through Sam.gov (Exclusions).

Davis-Bacon Compliance

Compliance with the Davis-Bacon Act (DBA) is critical for federally funded or assisted construction projects. The Davis-Bacon Act requires that contractors and subcontractors working on projects exceeding $2,000 pay laborers and mechanics no less than the locally prevailing wages and fringe benefits for similar work as determined by the Department of Labor.

- Prevailing Wage Rates: Contractors must ensure that all workers are paid at least the prevailing wage rates for their job classification, as listed in the wage determination for the project's location.
- Certified Payroll Reports: Contractors are required to submit weekly certified payroll reports to the contracting agency, documenting wages paid to each worker.
- Fringe Benefits: Fringe benefits, such as health insurance or retirement contributions, must either be provided in addition to the wage rate or included in the overall wage calculation.

PROCUREMENT POLICIES

The following policies for the procurement of supplies and other expendable property, equipment, real property, and other services in relation to the award and use of Federal funds in accordance with federal regulations (34 CFR §74.40-74.48):

Conduct/Conflict of Interest/Anti-Fraud

No employee, officer, or agent shall participate in the selection, award, or administration of a contract supported by Federal funds if a real or apparent conflict of interest would be involved. A conflict would arise when the employee, officer, or agent, any member of his or her immediate family, his or her partner, or an organization which employs or is about to employ any of the parties indicated herein, has a financial or other interest in the firm selected for an award. The officers, employees, and agents of the school or governing board shall neither solicit nor accept gratuities, favors, or anything of monetary value from contractors, or parties to sub-agreements.

Competition

All transactions will be conducted in a manner to provide, to the maximum extent practical, open, and free competition. Solicitations shall clearly establish all requirements that the bidder or vendor will fulfill for the bid or offer to be evaluated by the Board. All bids or offers may be rejected when it is in the Board's interest to do so.

APPROVAL AUTHORITY

Expenditures - Restricted Funds

The Superintendent is approved by the EKAPS Board to approve and make expenditures on behalf of the school for purchases on all expenses, including Restricted Funds.

Purchase requisitions must be completed for all restricted fund purchases and other one-time purchases. All purchase requisitions must show the amount of the purchase, if known, or if not known an estimate must be made. Prior to approving grant expenditures, the Superintendent and Finance Manager must be certain that the expenditures are in accordance with federal or state requirements. Approvals must be secured.

Expenditure type codes are used to properly code salaries, purchases, business and travel expenses and expense transfers in Financials. Every expense transaction must be coded with an expenditure type code to indicate how the money was spent.

COST ANALYSIS

- There is no price competition (e.g., sole-source procurement).
- The contract is being modified, and the costs cannot be determined easily from the contract itself.
- The purchase involves a cost-reimbursement contract.

Cost analysis involves evaluating individual cost elements (labor, materials, overhead) to determine whether the estimated cost is fair and reasonable. This includes:

- Verifying cost data provided by the contractor.
- Evaluating specific elements of cost (e.g., labor, materials).
- Ensuring that all costs are allowable, allocable, and reasonable per federal regulations.

PRICE ANALYSIS

This process involves comparing the proposed price to established market prices, catalog prices, or historical prices for similar goods or services. EKAPS follows these steps for price analysis:

Competitive Bids: When bids are obtained through competitive processes, EKAPS compares these bids to ensure the selected vendor offers the most reasonable price.

Catalog or Market Prices: For products or services with established market rates, EKAPS compares these to ensure the quoted price is within a reasonable range.

Previous Contract Prices: Where applicable, EKAPS reviews previous contracts to evaluate if the price increase is reasonable for similar goods or services.

EKAPS will conduct a cost/price analysis in connection with every procurement action to determine reasonableness, allocability, and allowability. Purchase requisitions under $5,000 must be approved by the Superintendent. Purchase requisitions greater than $5,000 require approval by the Superintendent.

EKAPS must get three formal, documented quotes for purchases over $500. Three competitive bids must be obtained for purchases over $10,000. The IT tech will assist in securing competitive pricing for computers, monitors, printers, software, and school technology infrastructure components.

ELECTRONIC AND PAPER RECORDS

EKAPS utilizes both electronic and paper-based filing systems maintained by our Finance Manager to ensure redundancy and accessibility of procurement records. These systems are regularly updated and backed up to prevent data loss. 2 CFR§200.318(i)

Maintenance of Procurement Records

EKAPS maintains these records for a minimum of three years after the final expenditure report for the federal award. If any litigation, claim, or audit is started before the expiration of the three-year period, EKAPS will retain the records until all issues are resolved.

Accessibility and Audits

All procurement records are kept in a secure, organized manner that allows for easy access for internal reviews, audits, or external agency requests. The record keeping system is designed to ensure that EKAPS can demonstrate compliance with federal procurement regulations during audits or monitoring by awarding agencies.

Non-Discrimination

In the selection of goods and services providers, EKAPS shall not discriminate for or against a private organization based on the organization's religious character or affiliation.

Contracts

Contracts will be made only with responsible contractors who possess the potential ability to perform successfully under the terms and conditions of the proposed procurement.

Purchasing Unnecessary Items

EKAPS shall only purchase items which are necessary and practical for the implementation of the school's programs. Purchase Orders will be completed by the Finance Manager to fulfill orders promptly.

PROCUREMENT AUTHORIZATION DOCUMENTATION

The procurement process at EKAPS follows a structured authorization workflow that ensures all purchases are properly vetted and approved. 2 CFR §200.303; §200.112

Pre-Procurement Approval: Before a procurement transaction is initiated, it must be reviewed and approved by the Superintendent.

Vendor Selection and Contracting: Records are kept of the entire vendor selection process, including bid solicitations, evaluations, and the final selection decision. Contracts are only executed after obtaining the Superintendent's final approval.

Payment Processing: Payments are only processed after confirming delivery of goods or services, with documentation of final payment approval by the Superintendent.

Historical Record Maintenance for Auditing

EKAPS maintains detailed procurement records to ensure compliance with regulatory requirements and to facilitate future audits. These records provide clear documentation of:

- **Procurement Justifications:** Include justification for the procurement need and any applicable bidding or competitive processes.
- **Approval History:** Clearly document the sequence of approvals, ensuring that all required authorizations are in place before proceeding.
- **Financial Records:** Keep thorough records of all payments made, including invoices and payment authorizations.

VERIFICATIONS AND RECONCILIATIONS

EKAPS maintains strict reconciliation procedures to ensure the accuracy of its financial records. These procedures are conducted regularly to compare financial transactions with supporting documentation and account records.

Monthly Reconciliation: EKAPS reconciles all financial accounts, including bank statements, procurement records, and financial ledgers, on a monthly basis. This reconciliation ensures that all transactions recorded in the accounting system are accurate and align with bank and vendor records.

- *Example:* Bank statements are reviewed and reconciled by the Finance Manager against EKAPS internal accounting records to ensure that all disbursements, deposits, and payments match. The Superintendent and/or Registrar then verifies these records are accurate.

Discrepancy Investigation: If any discrepancies are identified during reconciliation, they are promptly investigated by the Finance Manager. Discrepancies must be resolved before the reconciliation is considered complete. Discrepancy resolutions are verified by the Superintendent prior to being considered complete.

- *Example:* If an invoice amount differs from the amount recorded in the system, the Finance Manager investigates the variance, identifies the root cause, and corrects the records as needed then has the Superintendent verify the records.

Regular Procurement Review (2 CFR §200.318)

In addition to regular financial reconciliations, EKAPS conducts periodic reviews of its procurement processes to ensure compliance with federal procurement standards and internal policies.

Procurement Transaction Audits: EKAPS randomly audits procurement transactions to verify that proper procurement procedures were followed, and that each transaction was properly authorized, documented, and reconciled.

- *Example:* A quarterly review is conducted to check that all procurement transactions meet the federal guidelines, including bid solicitation and contract approval requirements.

Procurement Documentation Verification: For each procurement, EKAPS ensures that all required documentation (such as contracts, purchase orders, and bids) is properly verified and reconciled with financial records.

PERIOD OF PERFORMANCE OF FEDERAL FUNDS

EKAPS will ensure that all grant funds are used only for expenditures incurred during the award's period of availability, as specified in the grant agreement or federal regulations.

The Finance Manager and Superintendent will maintain a grant calendar that tracks the period of availability for each grant, ensuring that all expenses are incurred within the allowable time frame.

All obligations must occur on or between the beginning and ending dates of the grant project. 2 C.F.R. § 200.309. This period of time is known as the period of performance. 2 C.F.R. § 200.77. The period of performance is dictated by statute and will be indicated in the GAN. Further, certain grants have specific requirements for carryover funds that must be adhered to.

State-Administered Grants (also known as pass-through grants) are available for 27 months.

The period of availability is 27 months. Federal education grant funds are typically awarded on July 1 of each year. This maximum period includes a 15-month period of initial availability, plus a 12-month period for carryover 34 C.F.R. § 76.709. For example, funds awarded on July 1, 2015 would remain available for obligation through September 30, 2017

Pre-Award Cost Controls

Pre-award costs will only be incurred and charged to the grant if explicitly allowed by the grant agreement or prior written approval from the grantor agency is obtained. All expenditures will be reviewed and approved by the Superintendent to ensure they are incurred within the period of availability. Requests for payments or reimbursements must include documentation, such as invoices, receipts, and timesheets, that clearly indicates the date the expense was incurred. Expenditures that fall outside the period of availability will not be approved or will be reallocated to non-grant funds.

Timely Obligation of Funds

Obligations are orders placed for property and services, contracts and subawards made, and similar transactions during a given period that require payment by the non-Federal entity during the same or a future period. 34 C.F.R. § 200.71. The following table illustrates when funds are determined to be obligated under federal regulations: If the obligation is and obligation is made:

Acquisition of property	On the date which the LEA makes a binding written commitment to acquire the property
Personal services by an employee of the LEA	When the services are performed
Personal services by a contractor who is not an employee of the LEA	On the date which the LEA makes a binding written commitment to obtain the services
Public utility services	When the LEA receives the services
Travel	When the travel is taken
Rental of property	When the LEA uses the property
A pre-agreement cost that was properly approved by the Secretary under the cost principles in 2 CFR part 200, Subpart E- Cost Principles.	On the first day of the project period 34 C.F.R. § 75.707; 34 C.F.R. § 76.707.

Liquidation Periods

The Finance Manager will maintain a detailed list of all obligations incurred under each grant, including purchase orders, contracts, and other commitments, to ensure they are accurately tracked and managed.

The list of obligations will be reviewed regularly to ensure that all obligations are liquidated (i.e., paid or settled) by the end of the liquidation period specified in the grant terms, typically 90 days after the end of the grant period.

Monthly reconciliations will be performed to compare obligations against actual expenditures to ensure all funds are used appropriately and within the allowable liquidation period.

Any outstanding obligations approaching the end of the liquidation period will be flagged for immediate action to ensure they are settled in a timely manner.

The Finance Manager will communicate regularly with program managers to provide updates on outstanding obligations and to coordinate efforts to ensure that all obligations are liquidated before the end of the liquidation period.

Late Liquidation Requests

If EKAPS determines that it cannot liquidate all obligations within the standard liquidation period due to unforeseen circumstances (such as delayed invoicing from vendors or unavoidable administrative delays), it may submit a request for a late liquidation to SPCSA.

The request must be justified by clearly documenting the reasons for the delay and demonstrating that the expenses are allowable, allocable, and necessary under the terms of the grant.

Process for Submitting Late Liquidation Requests

The Finance Manager will prepare a written request for late liquidation to be submitted to SPCSA, including:

- A detailed explanation of why the request is necessary.
- A list of all outstanding obligations and the amounts involved.
- Documentation supporting the expenses and any steps taken to resolve delays.
- The request must be reviewed and approved by the Superintendent or before submission to SPCSA.

The Finance Manager will ensure that any late liquidation requests are submitted to SPCSA as soon as the need is identified and no later than 30 days before the end of the standard liquidation period or as specified by SPCSA guidelines.

Payment Processing

Timecards are tracked and approved in the payroll system. Timecards are reviewed and approved for each payroll submission by: Employee, Supervisor and HR Payroll Manager. Payroll is generated and processed through the payroll system with checks being direct deposited or mailed to employees based on choice.

Prior to Purchases

Quotes, Purchase Orders, and/or other backup information must be attached to the purchase requisition. Items requiring purchase requisitions include but are not limited to the following: technology purchases such as computers, printers and software, fixed assets, furniture, and equipment such as file cabinets, memberships and training or professional development costs.

Compensation and any other payments for goods and services must not be paid in advance of receipt of goods or services. Goods and/or services must not include tax. Shipping costs are only allowed if clearly included in grant funding approval.

For payments to be processed, there must be a fully itemized invoice, invoice must be approved and coded to the proper restricted fund by the appropriate person and matched to a purchase requisition (if required).

F5: FISCAL AUDITING

Annual Audit Requirement

In accordance with Nevada Administrative Code 387.775, each charter school must have an independent audit conducted of its accounts, consistent with auditing standards generally accepted in the United States of America, and consistent with any guidelines the Department may issue.

The purpose of this measure is to ensure that independent financial audit results demonstrate that a school meets basic expectations for financial management, controls, and oversight. The Nevada Administrative Code (NAC 387.765) requires charter schools to “comply with generally accepted accounting principles.” This measure assesses compliance with this requirement.

Charter school financial audits should be conducted annually (NAC 387.775) by independent auditors to evaluate a charter school’s financial statements and financial policies and practices. Auditors base their findings against Generally Accepted Accounting Principles (GAAP) and internal control guidelines. Auditors issue certified annual financial statements and render an opinion.

An unqualified opinion means that the school’s financials are accurate and complete, demonstrating strong financial management by the school. A qualified opinion, by contrast, raises concerns and may signal potential financial weakness. The reasons for a qualified auditor’s opinion are typically included in Audit Notes and in a separate management letter directed to the attention of the school’s governing board.

Single Audit Requirement (2CFR §200.501)

An organization with federal expenditures in excess of $1,000,000 is required by law to have a single audit performed, which includes an audit of both the financial statements and the federal awards. The single audit reviews how the organization managed the grant and ensures you followed the rules for dollars associated with the grant or award. A single audit is typically included as part of the annual independent audit, if required.

https://doe.nv.gov/Boards_Commissions_Councils/CharterAuditCommittee/Charter_Audit_Committee/

All school administration which includes the Superintendent, Finance Manager and HR Payroll Manager will be required to work closely with the independent audit firm to develop, implement and maintain all necessary internal controls to ensure accurate accounting with transparency. Audit results are posted to the EKAPS website.

AUDIT PREPARATION

Selection of Auditor: EKAPS will engage a qualified, independent auditor experienced in performing Single Audits in accordance with the requirements outlined in 2 CFR Subpart F. The auditor must follow Generally Accepted Government Auditing Standards (GAGAS).

Procurement of Auditor: EKAPS will use competitive procurement processes for selecting the auditor, ensuring that the selection complies with federal procurement standards (2 CFR §200.501 – §200.517, §200.509; §200.332).

Audit Contract: The contract with the independent auditor will explicitly state that the audit must be conducted in accordance with 2 CFR Subpart F and that the audit report must meet the reporting deadlines set by EKAPS and regulatory authorities.

Summary Of Audit Procedures and Responsibilities

The following procedures outline the roles and responsibilities within EKAPS to ensure proper execution and completion of the Single Audit:

Finance Manager:

- Ensure all federal award expenditures are accurately tracked and documented throughout the fiscal year.
- Prepare and provide the independent auditor with all necessary financial records, including grant documentation, invoices, and expense reports, in a timely manner.
- Collaborate with the auditor to respond to audit inquiries and facilitate the completion of the audit.

Superintendent:

- Oversee the engagement of the independent auditor and ensure compliance with procurement procedures.
- Monitor the progress of the audit and ensure timely completion in line with established deadlines.
- Review the audit report for accuracy before submission to external agencies.
- Approve the final audit report and ensure its submission to the SPCSA, FAC, and other relevant agencies.

Reporting Requirements and Deadlines

EKAPS will submit the Single Audit report to the following stakeholders in a timely manner, ensuring compliance with established deadlines:

State Public Charter School Authority (SPCSA):

- Deadline: The audit report must be submitted to SPCSA no later than February 28th following the end of the fiscal year.

- Submission Procedure: The audit report will be submitted electronically to SPCSA through its designated portal, along with any additional documentation required by SPCSA.

Federal Audit Clearinghouse (FAC):

- Deadline: The audit report must be submitted to the FAC no later than March 31st following the end of the fiscal year.
- Submission Procedure: EKAPS will upload the audit report, including the Data Collection Form (SF-SAC) and any associated documents, to the Federal Audit Clearinghouse in the required electronic format.

Other Relevant Stakeholders:

- EKAPS will also provide the audit report to other relevant federal, state, and local stakeholders as required by specific grant agreements or regulations.

Nevada Department of Education (NDE) and State Public Charter School Authority (SPCSA) Subrecipient Auditing

EKAPS adheres to the established procedures for monitoring performance and financial activities of subrecipients while maintaining compliance with federal grant guidelines, specifically 2 CFR §200.329, 2 CFR Subpart F, and 2 CFR §200.332.

EKAPS must adhere to the following Fiscal and Performance reporting intervals:

Quarterly and Semi-Annual Reports:

- Must be submitted within 30 calendar days after the end of each reporting period.

Annual Reports:

- Must be submitted within 90 calendar days after the end of the reporting period.

End of Year Reporting & Program Evaluation

The LEA, in consultation with staff and parents of children in Title I schools, annually reviews and, as necessary, revises its plan to improve Title I, Part A activities as it prepares the funding application.

SPCSA LEA Compliance Monitoring

Monitoring activities used to evaluate federal and state grant compliance.

- Desktop Monitoring
- Action Items/ Technical Support
- Onsite Monitoring
- Corrective Action Plans (CAP)

NDE Risk Assessment Monitoring

Monitoring activities used to evaluate federal and state grant compliance.

- Personnel and Organization
- Performance
- Documentation; including inventory records and time and effort
- Audit History
- Financial Analysis
- Internal Controls
- Policies and Procedures
- Samples and Documentation Review

TIMELY SUBMISSION AND ADHERENCE TO DEADLINES (2 CFR §200.501(D);§200.332)

EKAPS is committed to meeting all submission deadlines related to the Single Audit:

Timeline Review: At the close of each fiscal year, EKAPS will initiate the audit process in a timely manner to ensure that the report is completed and submitted well before the deadlines.

Internal Deadlines: EKAPS sets internal deadlines to provide the necessary documentation to the auditor and review the final report ahead of the external submission dates.

PROCEDURE FOR PREPARING FINANCIAL STATEMENTS (2 CFR §200.510)

Financial Record Review: At the end of the fiscal year, the Finance Manager reviews all financial records, ensuring that transactions are properly recorded in accordance with GAAP.

Trial Balance Preparation: The Finance Manager generates a trial balance to ensure that all debits and credits are properly accounted for.

Adjusting Journal Entries: Any necessary adjusting journal entries (such as accruals, deferrals, or depreciation) are made to reflect the accurate financial position of EKAPS.

Statement Drafting: The Finance Manager drafts the financial statements, incorporating the trial balance, adjusted journal entries, and any other relevant financial data.

Executive Review: The financial statements are reviewed by the EKAPS Superintendent before submission to the independent auditor.

PREPARATION SCHEDULE OF PRIOR AUDIT FINDINGS (2 CFR §200.511; §200.516)

Preparation of Schedule of Expenditures of Federal Awards (SEFA)

Schedule Development:

EKAPS prepares a Summary Schedule of Prior Audit Findings that includes all unresolved findings from previous audits.

The schedule documents:

- The status of prior findings.
- Whether corrective action was taken or is still pending.
- The reasons for any uncorrected findings and plans for resolution.

Format of Schedule:

The schedule will follow the format outlined by federal guidelines and include the following details for each finding:

- Finding reference number.
- Description of the prior finding.
- Corrective action taken (if applicable).
- Current status (resolved, ongoing, or not implemented).
- Explanation if corrective action was not implemented or is delayed.

Internal Review of Prior Findings

Follow-Up on Prior Findings: The Finance Manager reviews the status of prior audit findings to ensure that corrective actions have been implemented as outlined in previous audit reports.

SCHEDULE OF EXPENDITURES OF FEDERAL AWARDS (SEFA)

This schedule will reflect all federal awards expended by the school during the fiscal year, regardless of the source or the nature of the assistance. SEFA must include:

- **Total Federal Awards Expended:** A listing of the federal awards received and expended during the period. This includes federal awards in the form of cash or non-cash assistance.
- **Federal Agency:** The name of the federal agency providing the award must be listed.
- **Pass-Through Entity:** If the federal funds are received from a pass-through entity, such as a state government or another organization, this entity must be identified.
- **Federal Program Title:** Each federal program must be identified by its formal title.
- **Federal Award Identification Number (FAIN)**: Each federal award must include its specific identification number.
- **Amounts Passed Through to Subrecipients:** If any federal awards were passed through to subrecipients, the amount and subrecipients should be listed.
- **Clusters of Programs:** Federal programs that are part of a cluster (a group of closely related programs) must be listed together.
- **Total Federal Expenditures:** The total expenditures for each federal program or cluster must be provided.

NONCOMPLIANCE RESPONSE PROCEDURES

EKAPS will implement a structured response procedure for instances of noncompliance, including audit findings. This procedure will include the following steps:

- **Identification:** Noncompliance will be identified through internal audits, external audits, or monitoring.
- **Corrective Action Plan:** A Corrective Action Plan (CAP) will be developed within 30 days of the identification of noncompliance. The CAP will include:
    - Identification of the noncompliance issue,
    - Root cause analysis,
    - Specific actions to correct the issue,
    - Responsible personnel,
    - Timelines for resolution.
- **Implementation:** The CAP will be implemented with oversight from the Superintendent and Finance Manager.
- **Monitoring:** Ongoing monitoring will ensure that the issue does not recur. All instances of noncompliance will be documented and submitted to the appropriate authorities as required by federal guidelines (NRS 354.624).

CORRECTIVE ACTION PLAN FOR CURRENT YEAR FINDINGS (2 CFR §200.511(C))

Development of Corrective Action Plan

If applicable, each current year audit finding, EKAPS prepares a Corrective Action Plan (CAP) to address the identified issues and prevent recurrence. The CAP includes:

- **Detailed Description of Findings:** A description of each audit finding, including the area of non compliance or deficiency and the impact on operations.

Components of Corrective Action Plan

The CAP contains the following components for each finding:

- **Finding Reference Number:** Each finding will be identified by a unique reference number as provided in the audit report.
- **Action Steps:** A list of specific actions that EKAPS will take to correct the identified issue.
    - *Example*: If the finding relates to procurement, the action steps might include updating procurement policies, conducting staff training, and implementing additional internal controls.
- **Responsible Personnel:** Identify the staff members responsible for implementing each corrective action. These staff members may include:
    - *Administration:* Superintendent, or other administrative staff responsible for compliance oversight.
    - *Finance Manager and Superintendent:* responsible for financial oversight and implementation of internal controls.

- *Charter School Board:* The Board may be involved for governance-related findings or in cases where approval is needed for corrective actions.

AUDIT RESOLUTION PROCEDURES (2CFR Subpart F; §200.513(c)(6); §200.516; §200.332)

Identification and Review of Audit Findings

- **Initial Review:** Upon receiving the auditor's report, the EKAPS leadership team will promptly review the findings to identify any issues requiring resolution.
- **Communication with Stakeholders:** The findings will be communicated to the appropriate stakeholders, including auditors and SPCSA management, for further discussion and resolution planning.

Development of a Corrective Action Plan (CAP)

- **CAP Creation:** A Corrective Action Plan (CAP) will be developed in collaboration with relevant stakeholders, including EKAPS staff, auditors, and SPCSA management.
- **Timeline:** The CAP will outline specific actions to address each finding, with clear timelines for implementation. The timelines will be set to ensure that corrective actions are completed within a reasonable period.

Stakeholder Collaboration

- **Regular Meetings:** EKAPS will hold regular meetings with auditors, SPCSA management, and other relevant stakeholders to discuss the progress of the corrective actions and ensure all parties are aligned.
- **Ongoing Communication:** Continuous communication will be maintained throughout the audit resolution process to ensure transparency and timely resolution.

Resolution Submission

- **Submission of CAP:** Once the CAP is finalized and agreed upon by all stakeholders, it will be formally submitted to the appropriate authorities, including SPCSA management, for approval.
- **Audit Follow-up:** EKAPS will monitor the implementation of corrective actions and follow up with stakeholders to confirm that all findings have been resolved satisfactorily.

Documentation and Record Retention

- **Record-Keeping:** EKAPS will maintain detailed records of all audit findings, corrective actions, communications with stakeholders, and final resolutions.
- **Retention Period:** All related documentation will be retained for a minimum of three years, as required by federal regulations.

F6: INVENTORY PROCEDURES

Any items purchased or disposed of using grant funds, will adhere to the CFR guidelines. 2 CFR §200.313; §200.314 Equipment. Explore Knowledge Academy of Public Speaking (EKAPS) tracks all inventory through an Inventory Spreadsheet.

The spreadsheet is shared with the Finance Manager and IT Manager. No other staff have access. The Finance Manager is responsible for the inventory tracking.

The EKAPS inventory system is part of the financial management system, includes records documenting compliance with Federal Statutes, regulations, and the terms and conditions of the Federal Award, is sufficient to permit the preparation of reports required by general and program-specific terms and conditions; and the tracing of funds to a level of expenditure adequate to establish that such funds have been used according to the Federal Statutes, regulations, and terms and conditions of the Federal Award.

EKAPS Operations maintains procedures for managing goods/services purchased, in whole or in part, with federal funds. Internal tracking also includes:

- Stipends – EKAPS Stipend Reimbursement Spreadsheet
- Physical Inventory – EKAPS Inventory Spreadsheet and
- Project Based Time Updates– Email/Google Tracking spreadsheet

EKAPS Grant Inventory Process (2CFR §200.313(2CFR §200.501)(d)(2); §200.313(d)(5); §200.313(e) (1-4); §200.314)

Purpose: Maintain and track grant funded items purchased by school.

Implementation Guidelines: EKAPS has established management standards for grant funded inventory. The inventory records shall contain the following items:

- Grant program
- Federal Participation
- FAIN Number
- CFDA/ALN Number
- Unit Cost
- Purchase date
- Serial Number if applicable
- Tag Number
- Location
- Fiscal Year

New Inventory Procedure

Authorization for inventory purchases is acquired through the email notification by the Superintendent and Finance Manager. The Finance Manager creates Purchase Order (PO) for items or services which includes funding source and fiscal year. The Superintendent reviews and approves PO after verifying the allowability of the costs and availability of funds. Only authorized items will be considered for purchase. Specific funding sources must be identified prior to authorization to obligate funds and approval of PO.

1. Any items purchased or disposed of using grant funds, will adhere to the CFR guidelines. 2 CFR § 200.313; §200.314 – Equipment. Explore Knowledge Academy of Public Speaking (EKAPS) tracks all inventory through a EKAPS Inventory Spreadsheet. The spreadsheet is shared with the Finance Manager and IT Manager. No other staff have access. The Finance Manager is responsible for the inventory tracking. The tracker is downloaded weekly to prevent data loss.
2. Once an approved PO is submitted to a vendor, the original order documentation and PO are provided to EKAPS. Upon delivery, a copy of the invoice and packing slips are also submitted to the Finance Manager. Hard copy records are stored in the Finance Manager's file cabinet. All documents related to purchases of goods/services consistent with EKAPS policy are also kept electronically with the Finance Manager in alignment with EKAPS records retention policy. Packing slips are kept electronically with the Finance Manager. Upon receipt of new items, the Finance Manager will inspect the inventory to ensure it's in good condition and that it matches the item(s) specified on the purchase order, invoice, and packing slip. Items are then identified and tagged, and inventory information is then entered into the EKAPS Inventory Spreadsheet by the Finance Manager within 24 hours.
3. After new inventory has been identified, tagged, and entered to the EKAPS Inventory Spreadsheet, items are stored within the school site or off campus as appropriate for the purchases.

Inventory Information & Records (pursuant to 2 CFR §200.313(d)(1))

Inventory records will be maintained that include: a description of the property, a serial number or other identification number, source of funding for the property including the CFDA Number/ALN Number, FAIN Number, Passthrough (who holds title), the acquisition date, the cost of the property, the percentage of federal participation in the project costs for the federal award under which the property was acquired, the location of the property, the condition (including if lost, damaged, or stolen) and current use of the property, and disposition data (date of disposal) and sale price of the property.

Physical Inventory (pursuant to 2 CFR §200.313(d)(1))

EKAPS conducts physical inventory annually in August. Inventory records are updated and all property items are reconciled by the Finance Manager and IT Manager. Updates are made as needed continuously as items are purchased and received. Records from the physical inventory are reviewed by the Superintendent and stored according to the records retention policy for EKAPS.

Physical Inventory Process - (§200.313 – Equipment(d))

Receiving:

- Front Office Personnel receive all deliveries. All items are date stamped and recorded on 'Receipt of Delivery' tracker. Each package is assigned a delivery label to include the intended recipient.
- Finance Manager adds items purchased to the EKAPS Inventory Spreadsheet and adds grant purchases to EKAPS Grant Inventory Spreadsheet.
- Finance Manager takes possession of the items, compares the items received to the list in the Grant Inventory spreadsheet. Verification should include the following:
  - Invoice Number if applicable
  - Quantity that was ordered

- Packing slip intact

- All purchases are noted on the tracker when items are received and tagged.

Packing slips are kept electronically with the Finance Manager, and grant packing slips are included.

Tagging:

- Finance Manager affixes EKAPS inventory tag to the item received
- Scan items into the EKAPS Inventory document
- Scan Serial number if available
- Enter location that item will be stored in
- Distribute items to the correct department
- Any singular item valued at more than $500.00 will be noted on the EKAPS Inventory spreadsheet
- Consumable items will not be tagged individually but will be noted on the EKAPS Inventory Spreadsheet of location and purpose

Usage Monitoring

- **Usage Accountability:** Superintendent, Principal and Assistant Principal are responsible for ensuring that the equipment and inventory are used solely for the purposes for which they were purchased.
- **Periodic Audits:** Regular audits of equipment and inventory will be conducted to verify usage, condition, and location. The frequency of audits will be determined by EKAPS policies or funding requirements.

Items Checked Out/Assigned to EKAPS Staff

All equipment assigned to staff is recorded on the New Staff Tech sheet created upon hire. Any equipment issued that is grant funded will be highlighted in green to designate the grant status.

Finance Manager meets with new staff upon hire.

If a grant item is checked out to the staff member it is noted on the Tech Check Out sheet. The Grant name is noted on the sheet along with the EKAPS tracking number and serial number if applicable. Non tagged disposal items are noted and marked in the grant column.

Items Checked Out/Assigned to EKAPS Students

If a grant item is checked out to a student, the following occurs:

- Finance Manager is notified
- Finance Manager contacts the family to inquire if the item needs to be shipped or picked up. Address is confirmed for shipping.
- Parents receive a DocuSign form acknowledging they have requested and have received the item.

- Check out is noted in the student account along with the DocuSign form
- Items is noted on student check out page with the following information:
- Student name
- Item name
- Grant name
- Date checked out

ANNUAL INVENTORY/PERPETUAL INVENTORY

Inventory is checked annually in August.

- EKAPS staff is assigned an area to inventory.
- Returned form is compared against the tech sheet kept on file
- Once received, the items are compared to the current sheet held by the Finance Manager.
- Any discrepancies are investigated and corrected.

The **Perpetual Inventory** process involves continuous tracking and updating of inventory records in real time as equipment is purchased, transferred, or disposed of.

- Every time an asset is acquired, disposed of, or transferred; the inventory records must be updated immediately in the asset management system.
- The following details must be recorded:
    - Item description and serial number.
    - Purchase date and funding source.
    - Custodian and location of the item.
    - Disposition details (if applicable).

Any items stored in house for future use will be counted to ensure that it matches the location and amount on the EKAPS Inventory spreadsheet.

MAINTENANCE OF PROPERTY (PURSUANT TO 2 CFR 200.313(4))

The Finance and IT Managers review the use of items checked out with all new staff. If there are any issues while using equipment received, the staff contacts the Finance or IT Manager and arrangements are made to repair or replace. Any electronic items are also reviewed. Grant funded items are documented/tracked on the EKAPS Inventory Spreadsheet.

Controls to Safeguard Property (pursuant to 2 CFR 200.313(3)

The Finance Manager places all items on the EKAPS Inventory Spreadsheet. Items are tagged and logged on the Inventory Spreadsheet. The Finance Manager provides the estimated cost of replacement for lost/stolen items which is a signed document upon hire.

Equipment is stored onsite and offsite as appropriate for the item. All items are placed in locked cabinets. The Maintenance Manager has the key to all cabinets. Tech sheets are provided upon hire which lists the items checked off to individual staff. All equipment must be returned to the school upon separation of employment with EKAPS. Final checks are held until all equipment is returned.

Discrepancy Identification

Any discrepancies between the physical count and recorded inventory (e.g., missing, damaged, or relocated items) must be identified, documented, and investigated.

- Missing Equipment: If equipment is unaccounted for during the reconciliation process, an internal investigation will be initiated, and the Lost/Stolen Equipment Procedure will be followed. Documentation of the investigation and resolution will be recorded.
- Damaged Equipment: Damaged equipment will be assessed for repair or replacement.
- If the equipment is deemed irreparable, it will be marked for disposal according to EKAPS's disposition procedures.
- Record Adjustments: Once discrepancies are resolved, the inventory management system will be updated to reflect the current status of all equipment and assets.

DISPOSITION (Pursuant To 2 CFR §200.313(D)(2)(1); §200.313(d)(5); §200.313(e)(1-4); §200.314)

Reporting Lost Or Stolen Equipment

Immediate Notification

- Any employee who identifies equipment as lost or stolen must immediately notify their Administrator.
- In the event of theft, a report must also be filed with local law enforcement, and a copy of the police report must be provided to EKAPS's administration.

Internal Reporting

- The Administration must complete an incident report detailing the equipment that has been lost or stolen. This report will include:
  - Description of the equipment.
  - Serial number or identification tag.
  - Date of purchase and cost.
  - Last known location and custodian.
  - Circumstances of the loss or theft.

Investigation and Documentation

- Internal Investigation: EKAPS administration will conduct an internal investigation to determine the circumstances surrounding the loss or theft.

Disposition Documentation

- A written report documenting the investigation findings and the final determination on the equipment's status will be added to the inventory records.
- The report will include:
- A summary of the investigation.
- Actions taken, if any, to recover the equipment.
- Police report information (if applicable).
- Final resolution (i.e., equipment declared lost or unrecoverable).

Adjusting Inventory Records

- **Record Adjustment:** Once the equipment is deemed lost or stolen, the asset will be removed from the active inventory. The disposition of the asset will be recorded in the following ways:
- Equipment status updated to "Lost" or "Stolen."
- Date of disposition entered.
- Documentation retained for a minimum of three years, as required by federal regulations.

- Reporting to Funding Source (if applicable)

Grant Funded Equipment: If the lost or stolen equipment was purchased with federal grant funds, EKAPS will notify the relevant funding agency as required under the terms of the grant agreement. All necessary documentation, including the incident and police reports, will be provided.

Disposal of Equipment No Longer Needed §200.313(e)(1-4)

It is the determination of the school's administration or designee to identify obsolete equipment and inventory. Such determination may be made on the following that includes, but is not limited to: outdated information, poor shape/formatting/content, no longer usable, incompatible with current systems, damaged beyond reasonable repair, etc.

After a determination is made by the school's administration, the administration may take priority to donate items to a non-profit organization or relief fund at no cost to EKAPS based on the following guidelines:

A. If the equipment with a current fair market value of $10,000 or less (per unit) is no longer needed, it may be retained, sold, or otherwise disposed of with no further responsibility to the relevant funding agency (§200.313(e)(1)).

B. If the equipment with a current fair market value in excess of $10,000 (per unit) is no longer needed, the relevant funding agency will be notified for disposition instructions. If no response is received within 120 days, equipment will be disposed of according to the grant agreement. §200.313(e)(2-4).

Disposition Documentation

- A written report documenting the disposition will be added to the inventory records.
- The report will include:
- Fair Market Value
- Actions taken, if any, to notify the funding agency for disposition instructions.
- Disposal method

Adjusting Inventory Records

- **Record Adjustment:** Once the equipment is disposed of, the asset will be removed from the active inventory. The disposition of the asset will be recorded in the following ways:
- Equipment status updated to "disposed of"
- Date of disposition entered.
- Documentation retained for a minimum of three years, as required by federal regulations.
- Reporting to Funding Source (if applicable)

F7: RECORDS RETENTION

In accordance with 2 CFR §200.334-§200.338; 34CFR 76.730-731, financial records, supporting documents, and all other non-Federal entity records pertinent to a Federal award must be retained for a period of five years from the date of submission of the final expenditure report. These records and accounts must be retained and made available for monitoring activities and programmatic or financial audits. The Nevada requirements for local governments are detailed in the Local Government Records Retention Schedules (available at https://nsla.nv.gov/state_records_services#srrs). Any other records will be maintained per the Nevada State Library Archives retention schedule for "Records with a retention schedule related to School Districts", as identified in School Districts - R2020.

Record Creation and Classification

All records must be classified into the appropriate categories to ensure accurate retention and compliance. The key categories include:

- Federal Award Package: Grant applications, award letters, and contracts.
- Financial Records: Invoices, receipts, payroll, budgeting documents, general ledgers, and audit reports.
- Program Records: Evidence of program accomplishments, progress reports, written preapprovals, and final closeout reports.
- Student Records: Enrollment, transcripts, attendance, health records, special education records, and related files.
- Personnel/Administrative Records: Staff files, policies, meeting minutes, contracts, and compliance documentation.
- Inventory and Asset Management Records: Equipment purchase records, inventory tracking, and disposition forms.

All documents/files must be dated by school year or by project to facilitate easy tracking and compliance with retention schedules.

KEY PROGRAMMATIC DOCUMENTATION AND FINANCIAL RECORDS (2 CFR §200.334)

The following types of records must be retained for the 5-year period:

Financial Records

- **Final Expenditure Reports:** Documentation of all expenses reported at the conclusion of the federal award.
- Invoices, Receipts, and Payments: Records supporting all financial transactions, including invoices, receipts, payroll records, and proof of payments.
- General Ledger and Financial Statements: Summaries of financial activities related to the federal award.
- Cost Allocation and Reconciliation Reports: Documents detailing how costs were allocated to the federal award.

Programmatic Records

- **Grant Applications and Award Letters:** The original federal award documentation, including the application and approval letters.
- **Progress Reports:** Documentation showing program accomplishments and progress towards achieving goals.

- **Written Preapprovals:** Any preapprovals for significant changes in budget or program activities.
- **Performance Evaluations:** Reports detailing the performance of the program, including outcomes and impact.
- **Final Closeout Report:** The final programmatic report submitted to the federal awarding agency.

Administrative and Compliance Records

- **Audit and Monitoring Records:** Reports from audits, site visits, or monitoring activities, including responses to findings.
- **Equipment and Inventory Records:** Records showing the purchase, use, and disposition of equipment or property acquired with federal funds.
- **Written Policies and Procedures:** All documentation related to the implementation of required compliance measures, such as procurement and conflict-of-interest policies.

STORAGE AND ELECTRONIC FORMATTING (2 CFR §200.336)

Digital Record Storage

- **Cloud-Based Storage:** All digital records must be stored in secure cloud-based systems with appropriate encryption and data protection measures.
- **Encryption:** Data at rest and in transit must be encrypted using industry-standard protocols.
- **Backup:** Regular automated backups must be conducted, with offsite storage to ensure data recovery in the event of a disaster.
- **Access Control:** Only authorized personnel, based on role-based permissions, may access specific records. All access must be logged and audited regularly.

Physical Record Storage

- **Fireproof and Secured Storage:** Physical records must be stored in secure, fireproof cabinets or rooms with limited access.
- **Access Control:** Physical access to records is restricted to authorized personnel only. Records must be housed in a locked, secure location.
- **Environmental Protection:** Storage areas should be protected from environmental hazards such as water damage, pests, and excessive heat.

Hybrid Storage

- **Document Scanning and Digitization:** For records that require both physical and digital formats, physical documents must be scanned and stored electronically in a secure system, while the physical copies are securely archived as required.

Electronic and Machine-Readable Formatting

Electronic Formats

- **File Types:** All electronic records should be stored in widely used, machine-readable formats (e.g., PDF, CSV, XML, or other non-proprietary formats) to ensure accessibility and long-term usability.
- **PDF for Documents:** Scanned and digital records such as contracts, reports, and correspondence should be stored in PDF format to maintain document integrity.
- **CSV/XML for Data:** Financial data, inventory records, and other structured data should be stored in CSV or XML formats for easy retrieval and analysis.

Metadata and Indexing

- **Metadata:** Each electronic record must include metadata that indicates key information such as date created, retention period, author, and subject matter. This allows for easier categorization and retrieval.
- **Indexing:** All records should be indexed in the electronic system by categories such as record type, date, and project or program name. This will ensure that records can be quickly retrieved during audits or reviews.

Digital Security

- **Data Encryption:** All stored records must be encrypted using industry-standard encryption protocols (e.g., AES-256) to protect sensitive information.
- **Access Logs:** Access to electronic records must be logged, with regular audits of access logs to ensure no unauthorized access has occurred.
- **Regular Penetration Testing:** Conduct regular security tests to ensure the system's resilience against unauthorized access or data breaches.

Physical Security

- **Restricted Access:** Only authorized personnel may access physical records. Physical access controls, such as keycard entry, should be implemented.
- **Fireproof Storage:** Sensitive or irreplaceable records must be stored in fireproof cabinets or safes.

Access to Records

- **Availability for Review:** Records must be stored in such a way that they are readily accessible for federal agency or pass-through entity reviews, audits, or monitoring. EKAPS will respond to any requests for records within the time frame stipulated by the requesting entity.
- **Provision of Records in Machine-Readable Format:** Upon request from a federal awarding agency or authorized entity, EKAPS must provide electronic records in machine-readable format. All requested data will be delivered in formats such as CSV or XML for easy analysis and compliance review.

RESTRICTED ACCESS PROTOCOLS (2 CFR §200.337-338;§200.303(e))

Access to programmatic and fiscal records is restricted to the following authorized personnel:

- **Superintendent:** Overall access to all records for institutional oversight.
- **Finance Manager:** Access to all financial records, reports, and supporting documents. Access to programmatic records related to federal awards. External Auditors and Regulatory Authorities: Access as required for audits, monitoring, or regulatory review, with prior approval from the Superintendent.

- **IT Department:** Access to digital systems only for maintenance and security purposes; no direct access to the content of records unless required for technical support.
- **School Registrar:** Access to student-related programmatic records.

Digital Record Access

- **Role-Based Permissions:** Digital records are stored in secure systems with role-based permissions. Access is granted based on the user's role, ensuring that each stakeholder can access only the records relevant to their responsibilities.
- **Finance System:** Only the Finance Manager has access to financial systems and related records.
- **Student Information System:** Access to student records is restricted to the registrar and relevant administrative staff.
- **Multi-Factor Authentication (MFA):** All personnel must use MFA to access digital systems containing sensitive records to enhance security.
- **Audit Logs:** Digital access is tracked through system-generated audit logs, capturing the date, time, and user details for each access or modification.

Physical Record Access

- **Secured Storage Areas:** Physical records must be stored in locked, fireproof cabinets or rooms. Only authorized personnel, identified by role, may access these areas.
- **Access Keys/Codes/Logs:** Only designated personnel will be provided with keys or access codes to secured storage areas. Changes in personnel roles will prompt immediate updates to access credentials.

Security of Digital Records

- **Data Encryption:** All digital records must be encrypted at rest and in transit using industry-standard encryption protocols (e.g., AES-256).
- **Backup and Disaster Recovery:** Regular backups of digital records are performed, with offsite storage for disaster recovery. Only authorized IT personnel have access to backup storage locations.

Safety of Physical Records

- **Environmental Controls:** Physical storage areas are equipped with fire, water, and theft protection systems to safeguard records with limited to authorized personnel only, lock-and-key access control and security cameras where necessary.

Retention Schedule Implementation

Explore Knowledge Academy of Public Speaking (EKAPS) will maintain records for 7 years. These records will be kept on campus for up to 7 years, but a minimum of 5 years as deemed by the Superintendent. 2 Code of Federal Regulations 200.333 and GEPA requirements - It is required that all records associated with a federal grant or pass-through grant, including financial records, supporting documents, statistical records, grant award letters, grant budgets, grant application narratives, financial records, statistics, etc. must be kept five (5) years from the date of submission of the final expenditure; (or, for Federal awards that are renewed quarterly or annually, 5 years from the date of the submission of the quarterly or annual financial report respectively,) as reported to the Federal awarding agency or pass-through entity which is the Nevada Public Charter School Authority or Nevada Department of Education. Any other records will be maintained per the Nevada State Library Archives retention schedule for "Records with a retention schedule related to School Districts", as identified in School Districts - R2020.

Retention Periods

- **Federal Award Records:** Retained for five years from the date of submission of the final expenditure report.
- **Student Records:** Maintained in accordance with Nevada guidelines, including:
- **Master Register of Enrollment and Attendance:** Five years post-school year (NAC 387.175).
- **Class Record Book:** Two years post-school year (NAC 387.175).
- **Permanent Records:** Forwarded to the school district upon graduation or withdrawal (NAC 386.360).
- **Financial Records:** Retained for five years from the final report submission or audit resolution.
- **Inventory Tracking:** Retained for three years following disposition or final reconciliation.

Record Monitoring and Audits

- Retention schedules will be reviewed and updated annually to ensure alignment with changes in federal, state, and local regulations.
- Annual audits will be conducted to ensure that records are properly classified, stored, and managed according to the retention schedule.
- Internal Compliance Checks: Periodic reviews will ensure that all departments are following the policy.

Record Disposal and Destruction

Once the retention period has been met, records will be disposed of securely:

- **Digital Records:** Permanent Deletion: Digital records will be securely deleted from systems, ensuring no recoverable backups.
- **Physical Records:** Shredding: Physical records will be shredded and recycled, ensuring secure destruction.
- **School Property:** Except as stipulated in NAC 388A.515, the Board may, at any time declare school property as surplus and authorize its disposal when such property is no longer useful to the charter school, unsuitable for use, too costly to repair or obsolete. If reasonable attempts to dispose of surplus properties fail to produce a monetary return to the school, the Board may dispose of them in another matter.

Documentation of Destruction

All destruction actions must be documented, including:

- **Type of Record:** A description of the record being destroyed.
- **Date of Destruction:** The date on which the records were destroyed.

- **Method of Destruction:** The method used (e.g., shredding, deletion).

For sensitive records, such as financial or legal documents, a witness must certify the destruction process, and a destruction log must be maintained.

Contingency and Recovery Plan

- **Offsite Backup:** Digital records will have offsite backups to ensure data recovery in the event of a disaster.
- **Disaster-Proof Storage:** Essential physical records will be stored in disaster-proof locations such as fireproof vaults.
- **Annual Compliance Review & Training:** An annual review will be conducted to ensure that all record retention processes meet federal, state, and institutional requirements.

Records Retention Responsible Staff/Restricted Access

The following staff members are responsible for implementing and overseeing the records retention policy:

- **Superintendent:** Oversees overall compliance with the policy and ensures alignment with federal and state regulations.
- **Finance Manager:** Manages financial records and ensures compliance with financial retention requirements.
    - Ensures compliance with inventory and operational records retention.
- **School Registrar:** Maintains student records and ensures compliance with education-related retention schedules.
- **HR Payroll Manager:** Manages administrative and personnel records.
- **IT Department:** Manages digital storage, access control, and backup/recovery systems.

Property Inventory & Capitalization

Explore Knowledge Academy of Public Speaking (EKAPS) will maintain a complete property inventory which lists equipment and supplies. This inventory will be updated as necessary. The Board may authorize the employment of an appraisal company to assist with the inventory procedure. EKAPS will maintain an inventory of all capital assets in accordance with governmental accounting standards. EKAPS's inventory will be updated to include property newly purchased and disposed of annually. Capital assets include all charter school owned property such as land, building, improvements to property (i.e. parking lots) and equipment with a value greater than $500 per NAC 388A.515.

Physical Assets Purchased with Restricted Funds

All items purchased with restricted funds need to be tracked and inventoried by the school. The information must be maintained in a secure environment (i.e., system or network) with restricted access. An annual inventory must be performed. The physical inventory must be performed for all restricted fund purchases to catalog for restricted fund audit purposes. Physical assets purchased with restricted funds meeting the following criteria must also follow the fixed asset policy in the previous section in addition to the criteria laid out above.

- All items the asset has a useful life of one (1) year or more

- The cost of the asset is greater than $2,000.00

School Property

Real Property

Prior to acquiring real property, such property will be appraised by an appraiser certified in the State. The appraised value will be used to establish the fair market value of the property. If the Board is purchasing a site for educational purposes, such a building site will be located within the boundaries of the city limits, unless, by resolution of the Board, it is determined that it would be in the best interest of Explore Knowledge Academy to acquire a site outside the city limits.

Personal Property

Explore Knowledge Academy of Public Speaking (EKAPS) may purchase personal property as deemed necessary for the effective operation of the EKAPS by any means deemed appropriate when the expenditure of funds will be less than $50,000. When the purchase of personal property (except for curricular materials) is reasonably expected to cost $50,000 or more, EKAPS will obtain a minimum of three quotes. Purchases over $100,000 require a formal competitive bid process outlined in statute.

Construction of School Property

Explore Knowledge Academy of Public Speaking (EKAPS) may enter into contracts for construction of school property as deemed necessary for the effective operation of EKAPS by any means deemed appropriate when the expenditure of funds will be less than $50,000. When the construction of school property is reasonably expected to cost fifty thousand dollars ($50,000) or more, EKAPS will obtain a minimum of three quotes. The school board must authorize approval and verify that purposes follow regulations and statutes such as the Davis Bacon and Related Acts and SAM.gov vendor vetted as applicable.

Subcontractors

To ensure that contractors are "in good standing" the minimum requirement is to ensure that they are in good standing with the Secretary of State. Businesses will be vetted via SilverFlume.

Subcontractors include but are not limited to general contractors hired to fix school buildings, vendors hired to provide professional development or consultant firms hired to rework IT infrastructure. In part, this applies to businesses and individuals operating as a business.

Tax-Exemption

All Public Charter School property used exclusively for educational purposes is tax-exempt.

Property Classifications

- *Equipment* means tangible personal property (including information technology systems) having a useful life of more than one year and a per-unit acquisition cost which equals or exceeds the lesser of the capitalization level established by the Public Charter School for financial statement purposes, or $5,000. 2 C.F.R. §200.33.

- *Supplies* means all tangible personal property other than those described in §200.33 Equipment. A computing device is a supply if the acquisition cost is less than the lesser of the capitalization level established by the Public Charter School for financial statement purposes or $5,000, regardless of the length of its useful life. 2 C.F.R. §200.94.
- *Computing devices* means machines used to acquire, store, analyze, process, and publish data and other information electronically, including accessories (or "peripherals") for printing, transmitting and receiving, or storing electronic information. 2 C.F.R. §200.20.
- *Capital assets* means tangible or intangible assets used in operations having a useful life of more than one year which are capitalized in accordance with GAAP.

Capital assets include:

Land, buildings (facilities), equipment, and intellectual property (including software) whether acquired by purchase, construction, manufacture, lease purchase, exchange, or through capital leases, and additions, improvements, modifications, replacements, rearrangements, reinstallations, renovations or alterations to capital assets that materially increase their value or useful life (not ordinary repairs and maintenance). 2 C.F.R. §200.12.

Audits

Student's Cumulative Files are audited once a year. The Registrar will carry out an audit of records and student files to measure performance and complete a monitoring exercise.

Confidentiality of Special Programs Files

Confidentiality is one of the rights afforded to parents in the Parent Rights document (procedural safeguards). Confidentiality of educational records is a basic right shared by all children in public schools and their parents. These fundamental rights are described in the Family Educational Rights and Privacy Act (FERPA) of 1974, which applies to all students, not just those with disabilities. The circulation of special education files is strictly limited to the special programs personnel and those who need them for the efficient performance of their duties. All special education documents with personal identifying information are kept secure in a restricted access location, within the Special Education Department.

RIGHT TO AMEND

EKAPS reserves the right to amend, modify, or revise any policy, procedure, or guideline contained within this handbook at any time, with or without prior notice, in accordance with applicable laws and regulations. Amendments may be made to reflect changes in federal or state regulations, organizational policies, or operational needs.

Employees will be notified of any significant changes or updates through official channels, including but not limited to email notifications, meetings, or posted updates to internal systems. It is the responsibility of employees to stay informed of such changes and adhere to the revised policies once they take effect.

GRANT REPORTING TRACKER

- All requests for reimbursements are due the 15th of each month.

  - Spend down review – Monthly check
- EKAPS follows programmatic and financial reporting deadlines as identified in Epicenter.
  - SPCSA Epicenter Reporting Tracker
  - Master Grant Calendar
- EKAPS Important Annual Requirements

Name	**Type**	**Due Date**
Annual Financial & Single Federal Audit Requirement	NDE Fiscal Audit Requirement	December 30th - Each Year
Pupil Enrollment and Attendance Audit	NDE Audit Requirement	Occurs Annually
SPCSA Site Evaluation	Charter Authority Evaluation	As decided by SPCSA
SPCSA Grant Monitoring Audit	Charter Authority Evaluation	Occurs Annually
EKAPS School Accreditation	U.S. Dept of Education/Cognia Engagement Review	Every 5 Years- Last 2024
NDE Grant Monitoring Audit	NDE Student Investment Division, Office of Division Compliance	Occurs Annually
Desktop Monitoring Audit : Title, CRSSA, ARP ESSER	NDE Desktop Monitoring	New as of 2025 - Occurs Annually

EKAPS reviews and follows ‘Weekly Grant-Related Action Items, Updates & Reminders’ as published by the SCPSA Grant Monitoring Unit. Grant expenditures are completed within the grant award beginning and end dates.

COLLEGE COURSE CODE	COLLEGE COURSE CODE NUMBER	COMPLETE COLLEGE COURSE NAME	CORRESPONDING HIGH SCHOOL COURSE	SCHOOL COURSES for the EXCHANGE of DATA (SCED) CODE	COLLEGE COURSE CREDIT (AMOUNT EARNED)	HIGH SCHOOL CREDIT (AMOUNT EARNED)	GPA WEIGHT APPLIED TO DUAL CREDIT COURSE	POSTSECONDARY INSTITUTION NAME (FULL NAME)
AC	103B	Intro HVAC Mech Theory/Applications	HVACR	17055E1.0011	3	0.5	1	College of Southern Nevada
ACC	201	Financial Accounting	Accounting and Finance	12104C1.0011	3	0.5	1	College of Southern Nevada
ACC	202	Managerial Accounting	Accounting and Finance	12104C1.0011	3	0.5	1	College of Southern Nevada
ART	101	Drawing I	Fine Arts	05156C1.0011	3	0.5	1	College of Southern Nevada
ART	107	Design Fundamentals	Fine Arts	05156C1.0011	3	0.5	1	College of Southern Nevada
BUS	101	Introduction to Business	Business Management	12053E1.0011	3	0.5	1	College of Southern Nevada
BUS	102	Introduction to Entrepreneursh	Business Management	12053E1.0011	3	0.5	1	College of Southern Nevada
CED	200	Multicultural Issues of Counseling Students	Integrative Learning	25997C1.0011	3	0.5	1	University of Nevada Las Vegas
CED	300	Intro to Human Services Counseling	Integrative Learning	25997C1.0011	3	0.5	1	University of Nevada Las Vegas
CHI	111	First Year Chinese I	World Language	24402C1.0015	3	0.5	1	College of Southern Nevada
CHI	112	First Year Chinese II	World Language	24402C1.0015	3	0.5	1	College of Southern Nevada
CHI	113	Elementary Chinese I	World Language	24402C1.0015	3	0.5	1	College of Southern Nevada
CHI	114	Elementary Chinese II	World Language	24402C1.0015	3	0.5	1	College of Southern Nevada
COM	101	Public Speaking	English Language Arts	01155C1.0011	3	0.5	1	College of Southern Nevada
COM	102	Intro to Interpersonal Communication	English Language Arts	01155C1.0011	3	0.5	1	College of Southern Nevada
COM	113	Fundamentals of Speech Communications	English Language Arts	01155C1.0011	3	0.5	1	College of Southern Nevada
CRJ	211	Police in America	Law Enforcement	15054C1.0011	3	0.5	1	College of Southern Nevada
ENG	100	Compostion Enhanced	English Language Arts	01004C1.0012	5	0.5	1	College of Southern Nevada
ENG	101	Compostion I	English Language Arts	01004C1.0012	3	0.5	1	College of Southern Nevada; University of Nevada Las Vegas
ENG	102	Compostion II	English Language Arts	01004C1.0022	3	0.5	1	College of Southern Nevada
HIST	101	US History to 1877	Social Studies	04102C1.0011	3	0.5	1	College of Southern Nevada
HIST	102	U. S. History since 1877	Social Studies	04101C1.0011	3	0.5	1	College of Southern Nevada
HIST	208	World History I	Social Studies	04060C1.0011	3	0.5	1	College of Southern Nevada
HIST	209	World History II	Social Studies	04053C1.0011	3	0.5	1	College of Southern Nevada
MATH	104B	Applied Mathematics	Mathematics	02151C1.0011	3	0.5	1	College of Southern Nevada
MATH	120	Fundamentals of College Mathematics	Mathematics	02151C1.0011	3	0.5	1	College of Southern Nevada; University of Nevada Las Vegas

MATH	124	College Algebra	Mathematics	02069C1.0011	3	0.5	1	College of Southern Nevada; University of Nevada Las Vegas
MATH	126	Precalculus I	Mathematics	02110C1.0011	3	0.5	1	College of Southern Nevada; University of Nevada Las Vegas
MATH	127	Precalculus II	Mathematics	02110C1.0011	3	0.5	1	College of Southern Nevada; University of Nevada Las Vegas
MATH	128	Precalculus and Trigonometry	Mathematics	02106C1.0011	5	0.5	1	College of Southern Nevada
MATH	181	Calculus I	Mathematics	02121C1.0011	4	0.5	1	College of Southern Nevada
MUS	101	Music Fundamentals	Fine Arts	05113C1.0011	3	0.5	1	College of Southern Nevada
PHIL	101	Introducation to Philosophy	Social Studies	04306C1.0011	3	0.5	1	College of Southern Nevada
PHIL	102	Critical Thinking and Reasoning	Social Studies	04306C1.0011	3	0.5	1	College of Southern Nevada
PSC	101	Introducation to American Politics	Social Studies	04151C1.0011	3	0.5	1	College of Southern Nevada
PSY	101	General Psychology	Social Studies	04254C1.0011	3	0.5	1	College of Southern Nevada
PSY	200	Psychology of Personal & Social Adjustment	Social Studies	04255C1.0011	3	0.5	1	College of Southern Nevada
SOC	101	Principles of Sociology	Social Studies	04258C1.0011	3	0.5	1	College of Southern Nevada
SOC 102	102	Contemporary Social Issues	Social Studies	04259C1.0011	3	0.5	1	College of Southern Nevada
SPAN	113	Elementary Spanish I	World Language	24052C1.0015	3	0.5	1	University of Nevada Las Vegas
SPAN	114	Elementary Spanish II	World Language	24053C1.0025	3	0.5	1	University of Nevada Las Vegas
SPAN	111	First Year Spanish I	World Language	24052C1.0015	3	0.5	1	College of Southern Nevada