



BLUUM, INC.
IDAHO'S BUILDING ON SUCCESS

US DEPT OF EDUCATION
CHARTER SCHOOL PLANNING GRANT
CFDA 84.282A

ALLOWABLE COST GUIDE

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How to Use This Guide

Purpose

This document seeks to provide guidance and clarification for allowable expenditures for reimbursement under the Charter Schools Program (CSP) grant under CFDA 84.282A. The information provided in this cost guide is NOT comprehensive, but seeks to provide guidance to support CSP applicants and sub-recipient schools in planning and preparing budgets with the greatest impact on meeting CSP program goals. All costs are determined under the guidance of 2 C.F.R. Part 200, Subpart E. If you have questions about a specific cost item, please contact us at 208-336-8400 or finance@bluumcsp.org.

Method of Organization

Allowable costs are organized by the categories of expenditures listed below. Within each category are specific expenditure items that include a brief purpose and description, common budget codes, CSP stage eligibility, suggested adequate justification for reimbursement and an example of an allowable expenditure. The example is not intended to be inclusive of all scenarios. Some costs are never allowable within the CSP grant program. A list of unallowable costs is included at the end of this guide.

- Classroom Level Expenditures – Focus on providing a learning environment appropriate to age-level and the academic model of instruction. Ensures adequate resources are available to meet the needs of all students with specific focus on supplies.
- Instructional Support – Focus on providing a learning environment supporting all learners at their level of academic mastery. May include staffing resources, supplemental materials, etc.
- Operations – Focus on implementation of an infrastructure supportive of the academic model. May include equipment, software and other technology supporting the collection and analysis of data.

Important Information

All requested budget items must be *reasonable, necessary, allowable and allocable*. Further, all budget items must be aligned to the management plan, necessary to the completion of the grant objectives, and supported with justification for reimbursement. ***Required justification may require upfront planning and tracking and should be addressed prior to spending any approved funds.*** All submitted expenses must, at minimum, be supported with a purchase order or invoice and proof of payment. Please note additional requirements within each allowable expenditure. All expenditures must follow the sub-recipient board approved procurement requirements compliant with C.F.R. Part 200, and aligned with state and federal laws and guidance. All policies and procedures must apply uniformly to both federally financed and other



activities of the non-Federal entity and be clearly documented. All requested reimbursements MUST be part of the approved budget. Expenditures made prior to approval of a budget amendment will not be eligible for reimbursement. Any purchase above the school's capital policy will be considered equipment purchases.

The planning period is the time between the grant award and up to the first day of school. The implementation period begins no sooner than the first day of school. Sub-recipients should reference their grant award letter for specific time periods.

The following are additional resources for federal guidance pertaining to allowable costs under the CSP program:

[eCFR :: 2 CFR Part 200 Subpart E -- Cost Principles](#)

[U.S. Department of Education \(ED\) Charter Schools Program \(CSP\) Nonregulatory Guidance](#)

[Office of Management and Budget \(OMB\) Circular A-21, Cost Principles for Educational Institutions](#)

[OMB Circular A-87, Cost Principles for State, Local and Indian Tribal Governments](#)

[OMB Circular A-122, Cost Principles for Non-Profit Organizations](#)

Value-Add Budgeting

Approach to Value-Add Budgeting

The Bluum CSP project was built in conjunction with philanthropic, non-profit and state level organizations who share a common vision for increasing the number of high-quality seats in the Gem State serving the neediest student populations. These organizations have invested in multiple strategies for improving school quality, including a vast amount of research around the inputs that result in quality. To this end, the goal of Bluum's CSP project is to provide for funding to provide the foundation for accelerated implementation of research-based best practice strategies in new and expanding charter schools, thus accelerating and improving student academic outcomes.

Value-Add is the extra *value* created over and above the original *value* of something. *Budgeting* is the process of creating a plan of operations based on an estimate of an allotment of funds, time, etc. for a given period. *Value-add budgeting* is the creation of a plan of operations based on an allotment of funds that is over and above the original estimates, allowing for an acceleration of impact. To accomplish Bluum's ambitious CSP grant project goals, it is necessary



and required that all approved budgets look beyond foundational expenses and invest in best practice strategies and solutions proven to impact strong academic performance.

Allowable Cost Considerations

Grant funds are intended to supplement, not supplant, state or local funds. Federal non-regulatory guidance indicates “If the charter school can show that the state or local funds it has received are necessary to meet expenses other than the one at issue, then the charter school has met its burden of showing that the “other initial operations costs” cannot be met from state or local sources and, therefore, is allowable under the CSP grant.” Costs incurred must be one-time in nature, obligated *during* the grant project period, correlated to a grant objective, and may not include ongoing operational costs.

While there are short-term exceptions to operational expenses as noted in specific categories within this cost guide, key considerations to determine eligibility and best investment of funds include:

1. Is the expense required to operate the school?
 - a. If YES, the expense is not allowable.
 - b. If NO, move to Question #2.
2. Is the expense required for operations after the grant has ended?
 - a. If YES, the expense is not allowable.
 - b. If NO, move to Question #3.
3. Does the expenditure directly support the proposed objective?
 - a. If YES, the expense is allowable.
 - b. If NO, additional investment opportunities should be considered.

Allowable Expenditures (Classroom Level)

Classroom Library

Account Title	Purpose/Description	Planning	Implementation
Classroom Library – Classroom Library Books	Books for use in individual classroom libraries including fiction and nonfiction books, novels, book series, book sets, etc.	Y	Y

Example of Allowable Expenditure

ABC Academy places significant focus on building literacy in early grades. Free reading blocks are built within the daily schedule and students are encouraged to find books they are



interested in within their reading levels. To ensure an adequate supply of books are available at the varying levels and across varying interests, each teacher in grades K-4 are given an allowance of \$500 to stock their classroom library, equating to approximately 100 books.

Acceptable Justification for Reimbursement

In addition to the required financial documentation, the following may be required:

- Evidence of integration of classroom library materials into classroom time and/or instruction.

Funding Restrictions

Classroom libraries may include electronic media (e-books) if appropriate technology is available for student access. If electronic media takes the form of an annual subscription or renewable license, renewals are not allowable.

Computer Hardware and Software

Account Title	Purpose/Description	Planning	Implementation
Computer Hardware – Classroom Level Technology	Includes laptops, desktops, tablets, servers, wireless access points, charging carts, classroom-level printers, etc.	Y	Y
Computer Software – Classroom Level Technology	Includes all instructional software/programs, both online and disk, supplemental literacy programs, virtual instruction systems, tutoring programs, etc.	Y	Y

Example of Allowable Expenditure

ABC Academy has built has adopted a robust technology plan beginning in Kindergarten requiring access to technology each day, limiting the ability for shared devices outside of the classroom. Each classroom purchases devices at a 1:2 ratio to support the vision for integrating technology into instruction. Additionally, each device is equipped with access to a multitude of curriculum aligned supplemental support programs requiring a one-time license fee.

Acceptable Justification for Reimbursement

In addition to required financial documentation, the following may be required:

- Evidence of meeting all procurement requirements.
- Description of alignment to instructional model.



- Evidence of supporting professional development around online instruction and/or programs.

Funding Restrictions

All classroom-level technology must align to the academic model and support effective instructional practices. Costs may not include monthly service fees related to hardware. Subscription and license fees are allowable for software purchases. Purchases may not exceed reasonable quantities for the proposed student population.

Curriculum

Account Title	Purpose/Description	Planning	Implementation
Curriculum – Curriculum and Textbooks	Curriculum can include textbooks, supplemental instructional aids, student workbooks, curriculum packages (printed or electronic), teacher guides, etc.	Y	Y

Example of Allowable Expenditure

The staff at ABC Academy begins student planning and classroom setup one month prior to the first day of school. Mock lessons are setup and practiced using the curriculum and supporting resources. To ensure timely delivery of all resources, the ABC Academy team places the order 90 days prior to the teacher start date based on current projections for student enrollment. The Academy will take a similar approach to purchasing and learning the curriculum for additional subject areas and/or grades to be added during the grant period.

Acceptable Justification for Reimbursement

In addition to required financial documentation, the following may be required:

- Evidence of meeting all procurement requirements.
- Description of alignment to instructional model.
- Evidence supporting the projections of student enrollment.

Funding Restrictions

Curriculum must be aligned to the academic model and purchased in quantities not to exceed the proposed student population for each grade level. A limited supply of curriculum materials may be purchased for up to two grades prior to or beyond grades served to support



intervention and extended learning strategies. If electronic media takes the form of an annual subscription or renewable license, renewals are not allowable.

Furniture, Fixtures and Equipment

Account Title	Purpose/Description	Planning	Implementation
Furniture, Fixtures and Equipment – Classroom Equipment	Non-computer hardware for instructional use. Includes projectors, screens, document cameras, audio amplification, musical instruments, PE equipment, etc.	Y	Y
Furniture, Fixtures and Equipment – Classroom Furniture	Classroom furniture including desks, chairs, tables and bookshelves.	Y	Y

Example of Allowable Expenditure

As part of the talent retention strategy, ABC Academy has committed to ensuring that teachers have at least two weeks prior to the first day of school to access their fully setup classrooms to get familiar with new equipment and to properly setup the classroom configuration. This built-in time allows for planning and practicing of routines to measure effectiveness and efficiencies is anticipated to result in easier student transition and establishment of classroom norms more quickly. To meet this goal, all classroom equipment is planned for installation at least 60 days prior to the first day of school.

Acceptable Justification for Reimbursement

In addition to financial documentation, the following may be required:

- Evidence of meeting all procurement requirements.
- Description of alignment to instructional model.

Funding Restrictions

All classroom-level equipment and furniture must align to the academic model and support effective instructional practices. Costs may not include monthly service fees. Purchases may not exceed reasonable quantities for the proposed student population.



Materials and Supplies

Account Title	Purpose/Description	Planning	Implementation
Materials and Supplies – Classroom Level Consumable Supplies	Includes student workbooks, testing instruments, expendable items that are consumed as used such as paper, pencils, crayons, etc. May also include student headphones, calculators, etc.	Y	Y
Materials and Supplies – Classroom Level Postage	Postage for student and parent communication including newsletter distribution, happy grams, etc.	Y	Y

Example of Allowable Expenditure

As part of ABC Academy’s teacher retention strategy, teachers are provided an allocation of \$1,000 to purchase classroom supplies such as paper, pencils, project materials, etc. This strategy of pre-purchasing supplies will promote proactive lesson planning and ensure students are adequately supplied with the materials for engaging instruction.

Acceptable Justification for Reimbursement

In addition to financial documentation, the following may be required:

- Description of alignment to instructional model.
- It is recommended that a shared system for ordering is determined to allow for a direct bill setup and easy documentation of expenditures.

Funding Restrictions

Expenditures may be grouped as one budget line item, supported by a list of materials and supplies needed by grade level.



Allowable Expenditures (Instructional Support)

Computer Hardware and Software

Account Title	Purpose/Description	Planning	Implementation
Computer Hardware – School Library/Media Center /Computer Lab Technology	Includes laptops, desktops, tablets, servers, wireless access points, charging carts, docking stations, monitors, printers, etc.	Y	Y
Computer Software – School Library/Media Center/Computer Lab Technology	Includes all centralized software programs, both online and disk, including circulation software, digital collections, office software suite, graphics software, publishing software, internet tools, etc.	Y	Y
Hardware and Software - Maker Space & Science Lab	Includes 3D printers and software, electronic test equipment, any devices requiring electricity or battery power.	Y	Y

Example of Allowable Expenditure

ABC Academy has identified a space in the building to serve as the student media center, fully equipped with reference material and desktop computers. The media center will serve as a classroom for middle and high school elective courses including graphic design, yearbook and videography. Software programs supporting these classes are required for purchase on all systems in addition to the Microsoft Office suite. Computers will be setup and tested prior to the first day of school to ensure there is no disruption to class.

Acceptable Justification for Reimbursement

In addition to financial documentation, the following may be required:

- Evidence of meeting all procurement requirements.
- Description of alignment to academic model.
- Use of discounted technology resources such as TechSoup will be encouraged.

Funding Restrictions

All centralized technology must align to the academic model and support effective instructional practices. Costs may not include monthly service fees related to hardware. Subscription and license fees are allowable for software purchases. Purchases may not exceed reasonable quantities for the proposed student population.



Furniture, Fixtures and Equipment

Account Title	Purpose/Description	Planning	Implementation
Furniture, Fixtures and Equipment – School Library/Media Center/Computer Lab	Non-computer hardware for centralized use including DVD players, listening stations, paper cutters, label makers, binding equipment, book carts, etc.	Y	Y
Furniture, Fixtures and Equipment – School Library/Media Center/Computer Lab	Furniture and fixtures including desks, chairs, tables and bookshelves.	Y	Y

Example of Allowable Expenditure

Prior to the start of the year, all teachers are required to attend professional development workshops to be held in the school media center. Small group collaboration is encouraged and supported with several round tables, also setup for student use. Additionally, teachers have access to supplies such as binders, laminators, paper cutters, etc. to appropriately plan and setup the classroom as a welcoming environment for all students as they arrive the first day of school.

Acceptable Justification for Reimbursement

In addition to financial documentation, the following may be required:

- Evidence of meeting all procurement requirements.
- Description of alignment to instructional model.

Funding Restrictions

All centralized equipment must align to the academic model and support the chosen instructional strategies. Costs may not include monthly service fees. Purchases may not exceed reasonable quantities for the proposed student population.



Professional and Technical Services

Account Title	Purpose/Description	Planning	Implementation
Professional and Technical Services – Technology Installation	Costs associated with the installation of instructional networks and hardware.	Y	Y
Professional and Technical Services – Instructional Staff Training	Training for instructional staff including in-service training, professional development, conferences, workshops, demonstrations, school visits to other schools, etc.	Y	Y
Professional and Technical Services – Instruction and Curriculum Development	Services related to the development of curriculum and/or supporting resources and understanding techniques for instruction. Includes consulting fees, assessment tools, curriculum, etc.	Y	Y
Professional and Technical Services – Teacher and Leader Evaluation	Services related to the development of teacher and leader evaluation tools and a strategy for implementation.	Y	Y

Example of Allowable Expenditure

ABC Academy recognizes the importance of an integrated strategy for learning inclusive of workshops and personalized coaching and development. To that end, ABC Academy has entered into a year-long, all-inclusive contract for multiple workshops scheduled throughout the year and a determined number of coaching hours between workshops. The terms of the contract require a 50 percent deposit upon execution with two additional payments scheduled following the delivery of additional workshops and coaching later in the year.

Acceptable Justification for Reimbursement

In addition to financial documentation, the following may be required:

- Service agreements for purchases services.
- Evidence of completion. (i.e. deliverable, sign-in sheets, etc.)

Funding Restrictions

All professional services must be aligned to the academic model. Expectations for all deliverables and training outcomes must be clearly articulated in service agreements. All travel expenses must align to the approved travel policy.



Staff Recruitment

Account Title	Purpose/Description	Planning	Implementation
Outreach and Recruitment – Printing and Copying	Informational materials and intangible items and services to educate prospective staff about the school mission, program, contacts, application process, performance outcomes and to recruit staff. May include printing of brochures and postcards.	Y	Y
Outreach and Recruitment - Advertising	Informational materials and intangible items and services to educate prospective staff about the school mission, program, contacts, application process, performance outcomes and to recruit staff. May include radio spots, television ads, website design, newspaper ads, social media ads, outreach consultant fees, etc.	Y	Y
Outreach and Recruitment – Food and Beverages	May include snacks, small meals and/or beverages that entice participation in a recruiting event or is integral to the recruiting process.	Y	Y

Example of Allowable Expenditure

ABC Academy's recruitment process is inclusive of multiple steps of engagement, ensuring the right fit for the candidate and the school. One critical step of the recruitment process proven to have yielded strong results for the Academy is a lunch time networking session that allows all prospective candidates to network with existing staff. Lunch is a grab-and-go style recognizing the limited time of new and existing teachers.

Acceptable Justification for Reimbursement

In addition to financial documentation, the following may be required:

- Service agreements for purchased services.
- Evidence of completion. (i.e. deliverable, sign-in sheets, etc.)

Funding Restrictions

All outreach and recruiting expenses must clearly articulate the desired action such as an online employment application, job fair, etc. Expectations for all deliverables must be clearly outlined. All travel expenses must align to the approved travel policy.



Salaries

Account Title	Purpose/Description	Planning	Implementation
Salaries – Additional Support Roles	Includes salaries to be paid to employees of the school filling positions not required to the academic program, yet providing significant positive impact on student outcomes. Examples include interventionist, data coordinator, etc.	Y	Y
Salaries – Non-Core Classroom Staff	Includes salaries to be paid to employees filling positions non-essential to the academic model (i.e. PE, Art, Foreign Language).	Y	Y

Example of Allowable Expenditure

ABC Academy is opening as a K-5 model and proposes to serve a population of predominantly at-risk students, likely coming into the academic model behind academically and socially. The Academy's academic and instructional model is based on a student to teacher ratio of 1:20. To address the large influx of students within the first year and to establish a strong culture and support students in accelerating growth, the Academy has identified that a student to adult ratio of 1:15 will be required. To accomplish this, the Academy has hired short-term academic and behavioral interventionist to assist and support in the startup.

Another example – the school's class sizes are 25 students, and the school's plan is to offer two classes in each grade. During the first two years (the "implementation phase") the school uses CSP funds to hire a third Kindergarten teacher to reduce class sizes for the first two years.

Acceptable Justification for Reimbursement

In addition to financial documentation, the following may be required:

- PAR Report
- Job Description

Funding Restrictions

CSP funds may not be used to supplant salaries. All job descriptions, including part-time positions, must have clearly articulated responsibilities in order to decipher the difference in additional tasks covered by the grant. CSP funds may not be used to cover classroom teachers required within the academic model.



School Library

Account Title	Purpose/Description	Planning	Implementation
Library Books – School Library/Media Center Books	Books for use in centralized school library or media center including encyclopedia sets, fiction and nonfiction books, novels, book series, book sets, etc.	Y	Y

Example of Allowable Expenditure

ABC Academy has integrated a literacy block each week to be led by a Library Media Specialist in the school library. Prior to school beginning, all library books are to be labeled and sorted according to reading level ensuring all levels have an adequate supply of varying interest books to encourage reading.

Acceptable Justification for Reimbursement

In addition to financial documentation, the following may be required:

- Evidence of integration of school library/media center materials into academic program.

Funding Restrictions

School library or media center may include electronic media (e-books) if appropriate technology is available for student access. If electronic media takes the form of an annual subscription or renewable license, renewals are not allowable. Multiple year expenditures must include evidence of growth in student population and/or justification for additional purchase.

Stipends

Account Title	Purpose/Description	Planning	Implementation
Stipends - Professional Development Stipends	To support non-mandatory participation in professional learning opportunities.	Y	Y
Stipends – Summer School Stipend	To support staff in taking on additional responsibilities for summer school coordination.	N	Y
Stipends – Additional Role Stipend	To support staff in taking on additional responsibilities for roles such as data coordinator, testing coordination, mentorship roles, PLC leadership, etc.	N	Y



Example of Allowable Expenditure

ABC Academy plans to open in Fall 2025. All employment agreements will include a mandatory work schedule of August 1, 2025 through June 30, 2025. ABC Academy would like to implement a schoolwide behavior management initiative in Fall 2026. The training will be provided over three days in July. ABC Academy requests funding to cover a stipend of \$150 per day per participating teacher.

Acceptable Justification for Reimbursement

In addition to financial documentation, the following may be required:

- Sign-in and sign-out sheets for all participating teachers requesting the stipend.
- A copy of the employment agreement to confirm the learning opportunity was outside of contracted hours, a supplemental contract, or other documentation evidencing employee and employer agreement.

Funding Restrictions

Stipend amounts must be reasonable and aligned to salaries. For example, an average teaching salary of \$40,000 would support a stipend of \$150 per day. All professional development must be aligned to the grant management plan and support proposed outcomes.

Travel

Account Title	Purpose/Description	Planning	Implementation
Travel – Travel, Lodging and Registration	Travel costs to attend conferences and training workshops including all professional development, site visits to other schools, etc.	Y	Y

Example of Allowable Expenditure

ABC Academy is a replication of a school model located out of state. Leadership has chosen a small group of teacher leaders to visit the original school to observe classrooms, instructional style and classroom and system setups. All expenses inclusive of airfare, transportation and a per diem is covered for the participants.



Acceptable Justification for Reimbursement

In addition to financial documentation, the following may be required:

- Provide documentation for adherence to travel policy.
- Agenda with documented alignment to the CSP project objectives.
- Expectations for areas of observation and planned sharing of observed best practice with future teachers and leaders.

Funding Restrictions

Must be aligned to program outcomes and provide sustainable value to board and leadership capacity.

Allowable Expenditures (Operations)

Computer Hardware and Software

Account Title	Purpose/Description	Planning	Implementation
Computer Hardware – Administrative Technology	Includes laptops, desktops, tablets, servers, wireless access points, central printer, central copier, visitor registration hardware, desktop printers, etc.	Y	Y
Computer Software – Administrative Technology	Includes all centralized software programs, both online and disk, including inventory software, visitor registration software, office suite licenses, etc.	Y	Y

Example of Allowable Expenditure

ABC Academy has provided for teacher access to a multitude of student support resources and creative strategies to approach lesson planning. In an effort to reduce stress once the school year begins, teachers are given access to the master copier prior to school starting to prepare the necessary worksheets and instructional guides for the first few weeks. A central printer is purchased to support the large demand for copies and prints.

Acceptable Justification for Reimbursement

In addition to financial documentation, the following may be required:

- Evidence of meeting all procurement requirements.
- Evidence of developed protocols for each purchased system.



Funding Restrictions

Costs may not include monthly service fees related to hardware. Subscription and license fees are allowable for software purchases. Purchases may not exceed reasonable quantities for the proposed student population and administration.

Facility

Account Title	Purpose/Description	Planning	Implementation
Facility Expense – Mortgage or Lease Expenses	Mortgage, lease or rent payment for school facility PRIOR to the start date of school.	Y	N
Facility Expense – Modular Structure	Support in securing a bid for temporary space directly related to opening or expansion of a charter school.	Y	N
Renovations – Minor Repairs	To facilitate repairs to keep facilities in efficient operating condition.	Y	Y

Example of Allowable Expenditure

ABC Academy would like to take possession of the new building on June 1st prior to the opening date in September to allow for adequate planning and setup prior to the students arriving. To gain access and fulfill lease requirements, the Academy must pay an additional three lease payments on the building. Additionally, the inspection of the building identified some minor repairs to be made to the building to meet code. Repairs included a few repairs to the roof and some replacement of flooring tiles throughout the building. Repairs did not add value to the facility.

Acceptable Justification for Reimbursement

In addition to financial documentation, the following may be required:

- Copy of the lease agreement.
- Documentation that the expense cannot be covered by local funding sources.
- Documentation of inspection report.

Funding Restrictions

Cost is allowable only from the date of the award to the start date of school. Funds cannot be used for the purchase of portable classrooms, engineering, permits or tear down.



Furniture, Fixtures and Equipment

Account Title	Purpose/Description	Planning	Implementation
Furniture, Fixtures and Equipment – Administrative Furniture	Office furniture such as desks, tables, fireproof filing cabinets, etc.	Y	Y

Example of Allowable Expenditure

Recognizing the administrative front office team is the frontline to parents and the enrollment process, ABC Academy plans to setup the desks for this team in early April to correspond with open enrollment dates. Protocols for providing customer service and filing enrollment packets according to compliance guidelines will be reviewed and practiced.

Acceptable Justification for Reimbursement

In addition to financial documentation, the following may be required:

- Evidence of meeting all procurement requirements.
- Demonstrated student demand and enrollment.

Funding Restrictions

Purchases may not exceed reasonable quantities for the proposed administration.



Materials and Supplies

Account Title	Purpose/Description	Planning	Implementation
Materials and Supplies – Administrative Consumable Supplies	Includes expendable items that are consumed as used such as paper, pencils, staples, etc.	Y	Y
Materials and Supplies – Administrative Postage	Postage for student and parent communication including newsletter distribution, enrollment packets, etc.	Y	Y

Example of Allowable Expenditure

Area enrollment trends indicate that parents do not commit to a school until school begins. ABC Academy seeks to engage parents more regularly between the enrollment window and the school start date through a printed newsletter and student profiles. All parents are mailed a newsletter and student profile survey with a pre-stamped envelope to return the profile. Student profiles help the team to plan out classroom assignments and necessary support staff.

Acceptable Justification for Reimbursement

In addition to financial documentation, the following may be required:

- Description of alignment to instructional model.

Funding Restrictions

Expenditures may be grouped as one budget line item, supported by a list of materials and supplies needed by grade level.



Community Engagement, Outreach and Student Recruitment

Account Title	Purpose/Description	Planning	Implementation
Community Engagement, Outreach and Student Recruitment– Postage	To be used for promotional or informational mailings to promote school program and/or to keep stakeholders informed.	Y	Y
Community Engagement, Outreach, Staff and Student Recruitment – Printing and Copying	Informational materials and intangible items and services to educate the community about the school mission, program, contacts, registration process, lottery, performance outcomes and to recruit students. May include printing of brochures and postcards.	Y	Y
Community Engagement, Outreach, Staff and Student Recruitment - Advertising	Informational materials and intangible items and services to educate the community about the school mission, program, contacts, registration process, lottery, performance outcomes and to recruit students. May include radio spots, television ads, website design, newspaper ads, social media ads, outreach consultant fees, etc.	Y	Y
Community Engagement, Outreach, Staff and Student Recruitment - Staff Salaries	Includes salaries to be paid to employees of the school performing surveys, managing events, needs analyses or other work connected to these CSP requirements: <ul style="list-style-type: none"> Solicit and consider input from parents and other members of the community Developing and utilizing effective parent and family and community engagement strategies Constructing needs analyses and descriptions demonstrating community support and demand 	Y	Y
Community Engagement, Outreach, Staff and Student Recruitment - Professional Services	Contractors performing surveys, managing events, needs analyses or other work connected to these CSP requirements: <ul style="list-style-type: none"> Solicit and consider input from parents and other members of the community Developing and utilizing effective parent and family and community engagement strategies Constructing needs analyses and descriptions demonstrating community support and demand 	Y	Y
Community Engagement, Outreach, Staff and Student Recruitment – Food and Beverages	May include snacks, small meals and/or beverages that entice participation in a recruiting event or is integral to the recruiting process.	Y	Y



Example of Allowable Expenditure

ABC Academy is to host an enrollment fair. Parent demographics suggest that many parents work full-time jobs, hence making evening the preferred time for the fair. Research has shown that food will create an easier decision for parents as they can accomplish both needs simultaneously.

ABC Academy engages a consultant to perform well-designed community surveys and to prepare annual reports for the public, the school's board and administrators.

Acceptable Justification for Reimbursement

In addition to financial documentation, the following may be required:

- Clearly articulated outcomes for each expenditure.
- Justification for quantity of mailed items.
- Evidence of reach and impact for all advertisement placements.

Funding Restrictions

All expenditures must align with an outreach and communication strategy. All outreach materials must state that the school is a *public community school* and include enrollment information. Materials must be specific to the school and distributed within the grant period identified in the award notice. Promotional products are NOT allowable. School signage may not be permanent as to not be classified as a capital improvement.

Playground Equipment

Account Title	Purpose/Description	Planning	Implementation
Furniture, Fixtures and Equipment – Playground Equipment	Playground structures and equipment including playscapes, tetherball sets, swing sets, portable basketball hoops, etc.	Y	Y

Example of Allowable Expenditure

ABC Academy will serve a population of students in grades K-5. The Academy values the lessons in play and physical activity and has built in recess time throughout the day. The Academy purchases several pieces of equipment including tetherball sets for hand-eye coordination techniques, portable basketball hoops for team coordination and portable bar sets to build strength. All equipment is moveable and flexible for the grades served.



Acceptable Justification for Reimbursement

In addition to financial documentation, the following may be required:

- Evidence of meeting all procurement requirements.
- Evidence of mobility for all purchased equipment.

Funding Restrictions

Ground cover, fencing and other enclosures, and costs associated with construction activities are not allowable. Capitalized improvements are not allowable. All equipment should be reasonable to the student population size and age.

Professional and Technical Services

Account Title	Purpose/Description	Planning	Implementation
Professional and Technical Services – Professional Services and Consulting	Costs associated with services related to start-up expenses and organization development. Includes legal costs for lease and charter negotiations, bylaws, policies, consulting fees to develop organization policies and business plan, development of internal controls, accounting systems, etc.	Y	Y
Professional and Technical Services – Audit Services	Cost associated for FIRST year audit and revision of internal policies as needed.	N	Y
Professional and Technical Services – Grant Oversight and Management Fees	Cost associated with grant management and coordination of grant reporting, budget amendments, etc.	Y	Y

Example of Allowable Expenditure

ABC Academy has limited capacity for grant management and reporting. Staff is focused on implementation of activities included in the management plan and seeks to prioritize those actions. The Academy contracts with a grant manager to serve as a checks and balance on promised activities and to collect progress and impact as available for reporting purposes.

Acceptable Justification for Reimbursement

In addition to financial documentation, the following may be required:

- Contract inclusive of scope of work.



Funding Restrictions

Audit services are limited to one time ONLY. Grant management services must not exceed 3 percent of all funding. All other professional services must be aligned to the management plan and result in clear deliverables and protocols.

Renovation must be necessary for the performance of the grant and neither adds to the permanent value of the property nor appreciably prolongs its intended life.

Salaries

Account Title	Purpose/Description	Planning	Implementation
Salaries – Essential Staff Salaries	Includes salaries to be paid to employees of the school essential during pre-open period such as the principal and office administrator.	Y	N

Example of Allowable Expenditure

ABC Academy’s standard contract with staff requires them to report 30 days prior to the first day of school to participate in planning, training and setup activities. Given local funding is not available until after the first day of school, all salaries will be paid through the CSP grant to ensure adequate training and preparation can be completed.

Acceptable Justification for Reimbursement

In addition to financial documentation, the following may be required:

- PAR Report
- Job Description

Funding Restrictions

Cost allowable ONLY prior to school opening date.



Transportation

Account Title	Purpose/Description	Planning	Implementation
Transportation	One-time startup costs associated with providing transportation to students to and from the charter school.	Y	N

Example of Allowable Expenditure

ABC Academy is located in a rural town and determined that enrollment will only be met with the adoption of a transportation plan. ABC Academy determines that it can fulfill the bus rounds with only two buses and analysis of investment indicates that purchasing is a better investment than leasing due to the extended mileage. ABC Academy uses the CSP program to purchase one of the busses.

Acceptable Justification for Reimbursement

To justify the expenditure, the following may be required:

- Evidence of adherence to purchasing and procurement policy.
- Evidence of transportation plan and community need assessment.

Funding Restrictions

One-time only.

Travel

Account Title	Purpose/Description	Planning	Implementation
Travel – Travel, Lodging and Registration	Travel costs for principal and board to attend conferences and training workshops including all professional development, site visits to other schools, etc.	Y	Y

Example of Allowable Expenditure

A local organization is hosting a board training seminar approximately 4 hours away from the school. Two board members have been selected to attend and have agreed to report back to the full board. All travel inclusive of mileage, hotel and per diem food expenses will be covered.



Acceptable Justification for Reimbursement

To justify the expenditure, the following may be required:

- Provide documentation for adherence to travel policy.
- Agenda with documented alignment to the CSP project objectives.

Funding Restrictions

Must be aligned to program outcomes and provide sustainable value to board and leadership capacity.

Unallowable Expenditures

The following expenditures are unallowable under any circumstance as part of the Bluum CSP grant project:

Alcoholic Beverages

Costs of alcoholic beverages are unallowable.

Apparel

Student uniforms, athletic and extracurricular uniforms and costumes, staff uniforms, etc.

Capital Improvement

Addition of permanent structural improvement or restoration of some aspect of a property that will either enhance the property's overall value or increase its useful life.

Construction

Construction of new or existing facility, building renovations, refurbishments or restoration. All activities for which an architect and/or engineer must be utilized.

Entertainment

Costs of entertainment, including amusement, diversion, and social activities and any associated costs are unallowable.



Fundraising

Costs of organized fund raising, including financial campaigns, endowment drives, solicitation of gifts and bequests, and similar expenses incurred to raise capital or obtain contributions are unallowable. Fund raising costs for the purposes of meeting the Federal program objectives are allowable with prior written approval from the Federal awarding agency. Proposal costs are covered in §200.460 Proposal costs.

Lobbying

Lobbying or related expenses.

Promotional Items

Promotional materials such as pencils, pens, balloons, notepads, etc.

Security

Security fences, alarms, cameras, etc.

Student Activity Costs

Costs incurred for intramural activities, student publications, student clubs, and other student activities, are unallowable, unless specifically provided for in the Federal award.



Federal Procurement Rules and Checklist

Procurement Compliance Requirements For Recipients of Federal CSP Dollars

It is critical for the grant recipient to follow Federal procurement requirements. The following guidelines should be followed. A sample procurement checklist in Excel is available to help document compliance with Federal requirements, an image of the checklist is included in this section.

QUESTION

Evaluate whether a nonprofit, as the recipient of a grant from the U.S. Department of Education (“DoE”) is required to comply with any particular procurement requirements to retain consultants and other service providers and, if so, what steps must be taken for compliance.

SHORT ANSWER

A nonprofit grantee, having received DoE Grant PR/Award Number S282A230005 (the “Grant”), is required to comply with procurement procedures, including bidding processes, imposed by the language of the Grant itself and certain federal regulations. *See* Section II in link below. The steps for compliance vary by the amount of Grant money spent and are outlined specifically below.

BRIEF SUMMARY

Below is a short outline of the requirements. Please refer to the detailed legal analysis below for all of the regulations and requirements. References to certain sections of the detailed analysis are included in the outline for your assistance.

Before Soliciting or Awarding Contracts:

Prepare Written Procedures - prepare written procedures and standards for procurement

- See **Section I in link below** for the written procedure requirements
- Include Conflicts of Interest Policy (your current policy is sufficient but should be incorporated by reference into these written standards)

Hold a Board Meeting

- have the Board approve and adopt the written procedures
- have the Board designate the decision maker(s) for awarding contracts

Determine if the Service/Good You Intend to Procure is an Allowed Use of Grant Funds – funds for procurement can generally be used to cover direct costs as long as three criteria are met, and the cost is not expressly disallowed; the three considerations that govern whether a direct cost can be covered are that the cost:

- Is incurred specifically for the Federal award;
- Benefits both the Federal award and other work of the non-Federal entity and can be distributed in proportions that may be approximated using reasonable methods; and



- Is necessary to the overall operation of the non-Federal entity and is assignable in part to the Federal award in accordance with the principles in this subpart.

The following costs are expressly disallowed:

- Use of funds (or equipment paid for by funds) for religious worship, instruction, or proselytization; and
- Use of funds for acquisition of real property or for construction unless specifically permitted by the authorizing statute or implementing regulations for the program.

Determine Contract Amount – the value of the contract to be awarded determines the process that you must follow. In each instance, you need to identify the total amount of Grant funds that will be spent on the contract.

Prepare Solicitation as Applicable – be sure to include additional required contract provisions as identified in Section III(9) in link below.

Procedure to Follow Based upon Contract Amount:

Contract of \$10,000.00 or Less (“Micro-Purchases”) – See Section I(2)(a)(i); Section III(3)(a), in link below

- Board must determine that the price is reasonable for the good or service in question
- To the extent practicable, the decision maker must distribute micro-purchases equally among qualified suppliers
- No solicitation or bid requirements
- No publication requirement
- For all procurements, regardless of size, efforts must be made to use small and minority businesses and women’s business enterprises where practicable (see Section I(2)(b); Section III(4), in link below)

Contract Between \$10,000.00 and \$250,000.00 (“Small Purchase Procedures”) – See Section I(2)(a)(II); Section III(3)(b) in link, below

- Solicitation and at least three (3) bids from qualified sources required (unless not possible); 2 of which should be new sources
- Solicitation must adequately describe the goods and/or services to be procured
- Solicitation cannot impose unreasonable requirements on potential sources
- No publication requirement
- Decisions regarding which bid to accept must be made in an impartial manner and on the basis of the criteria established in the solicitation (lowest bid is not required to be accepted)
- For all procurements, regardless of size, efforts must be made to use small and minority businesses and women’s business enterprises where practicable (see Section I(2)(b); Section III (4), in link below))



Contracts in excess of \$250,000.00 (“Sealed Bid” or “Competitive Process”) – See Section I(2)(a)(iii); Sections III(3)(c)-(d), in link below

- Publication required
- Either a sealed bid process or other competitive process required (see Sections III and V(3) in link below for details of procedure)
- Generally, lowest bid must be accepted
- For all procurements, regardless of size, efforts must be made to use small and minority businesses and women’s business enterprises where practicable (see Section I(2)(b); Section III(4), in link below)

Specialized Contracts - Single Source Procurement – Allowed only under the following circumstances (“Noncompetitive Proposal”) – See Section I(2)(a)(iv); Sections III(3)(e), in link below

- The item is available only from a single source;
- The public exigency or emergency for the requirement will not permit a delay resulting from competitive solicitation;
- The Federal awarding agency or pass-through entity expressly authorizes noncompetitive proposals in response to a written request from the non-Federal entity; or
- After solicitation of a number of sources, competition is determined inadequate.

Additional Requirements Applicable to Certain Contracts

The governing federal regulations impose a number of additional requirements in particular circumstances. The complete list of these unique requirements can be found in Section V (9) link below, and most will not apply to grantee’s contracts (i.e., Clean Air Act Provisions, requirements for prime construction contracts, etc.). Most likely to apply to the grantee are: that all contracts in excess of \$10,000 must address termination for cause and for convenience by grantee including the manner by which it will be effected and the basis for settlement; the grantee cannot procure from an entity having been debarred or suspended from accepting federal money (available <http://www.sam.gov>); and a source of procurements of over \$100,000.00 must provide a certification that it has not and will not use federal funds to lobby any election.

[More detailed information is available on request, including a detailed legal analysis.](#)



Sample procurement Checklist - \$10,000 to \$250,000

FEDERAL PROCUREMENT DOCUMENTATION

SCHOOL: _____
 DATE: _____
 ITEM(S) BEING PROCURED: _____

Requirements for purchases between \$10,000.00 and \$250,000.00 ("Small Purchase Procedures")

- Solicitation and at least three (3) bids from qualified sources required (unless not possible); 2 of which should be new sources
- Solicitation must adequately describe the goods and/or services to be procured
- Solicitation cannot impose unreasonable requirements on potential sources
- Decisions regarding which bid to accept must be made in an impartial manner and on the basis of the criteria established in the solicitation (lowest bid is not required to be accepted)
- Efforts must be made to use small and minority businesses and women's business enterprises where practicable

Source #	Vendor Name	New Source	Identified as: (enter "X")			
			Small Business	Minority-Owned	Women's Bus Ent	BID Attached
1						
2						
3						

If less than three bids - explanation:

Proposal Review Criteria and Scoring (At least 1 criterion)

Criterion 1:	Best Price	Scale of 1-3, 3 being best
Criterion 2:	Local Support	Scale of 0-3, 3 being best
Criterion 3:	Delivery Date	Scale of 1-3, 3 being best
Criterion 4:		

These are just examples, set criteria and scoring to meet your needs. You can have as little as 1 criterion (price)

Source #	Bid Price		Local Support		Delivery Date		Delivery Date		Total Score
	Bid Price	Score	Local Support	Score	Date	Score	Date	Score	
1	\$0	3	Yes 24 hr	3	6/30/2020	1			7
2	\$0	2	Yes 8-5pm	2	5/30/2020	2			6
3	\$0	1	No	0	4/30/2020	3			4

Decision

Explain decision - example - we selected Source 1 based on our scoring rubric.

For purchases > \$25,000, verified the vendor is not Suspended or Debarred

Visit: <https://www.sam.gov/portal/public/SAM/>
 Enter Date Verified: _____

And search for the vendor. Detailed instructions on Next tab.

Procured by: _____ Reviewed: _____
 Name: _____ Name: _____
 Title: _____ Date: _____ Title: _____ Date: _____



Sample procurement Checklist – Purchases greater than \$250,000

FEDERAL PROCUREMENT DOCUMENTATION

SCHOOL: _____
ITEM(S) BEING PROCURED: _____

DATE PUBLICIZED: _____ DATE BIDS DUE: _____
HOW BID WAS PUBLICIZED: _____

RESPONSES

Source #	Vendor Name	Debarred or Suspended (Y/N)	New Source (Y/N)	Identified as: (enter "X")			
				Small Business	Minority- Owned	Women's Bus Ent	BID Attached
1							
2							
3							
4							
5							

If less than three bids - explanation:

Proposal Review Criteria and Scoring (At least 1 criterion)

Criterion 1:	Best Price	Scale of 1-3, 3 being best
Criterion 2:	Local Support	Scale of 0-3, 3 being best
Criterion 3:	Delivery Date	Scale of 1-3, 3 being best
Criterion 4:		

These are just examples,
set criteria and scoring to
meet your needs. You
can have as little as 1
criterion (price)

Source #	Bid Price	Bid Price Score	Local Support	Local Support Score	Delivery Date	Delivery Date Score	Total Score
1	\$0	3	Yes 24 hr	3	6/30/2020	1	7
2	\$0	2	Yes 8-5pm	2	5/30/2020	2	6
3	\$0	1	No	0	4/30/2020	3	4
4	\$0	1	No	0	4/30/2020	3	4
5	\$0	1	No	0	4/30/2020	3	4

Decision

Explain decision - example - we selected Source 1 based on our scoring rubric.

For purchases > \$25,000, verified the vendor is not Suspended or Debarred

Visit: <https://www.sam.gov/portal/public/SAM/>
Enter Date Verified: _____

And search for the vendor. Detailed instructions on
Next tab.

Procured by: _____
Name: _____
Title: _____ Date: _____

Reviewed: _____
Name: _____
Title: _____ Date: _____



Vendor Debarment/Suspension Verification

How to Search to see if a Vendor is Debarred or Suspended

- Go to www.sam.gov
- Click the “Search Records” button
- You do not need to enter a username or password

The screenshot shows the SAM (System for Award Management) website. At the top, there is a header with the SAM logo and a navigation bar with links: HOME, SEARCH RECORDS, DATA ACCESS, GENERAL INFO, and HELP. Below the navigation bar, there are three main sections: CREATE USER ACCOUNT, REGISTER/UPDATE ENTITY, and SEARCH RECORDS. The SEARCH RECORDS section is highlighted with a red circle around the 'Search Records' button, and a red arrow points to it. The bottom of the page contains a footer with the SAM logo, version information (IBM v1.1618.20140321-1442), and a note to all users: 'This is a Federal Government computer system. Use of this system constitutes consent to monitoring at all times.' There are also logos for GSA, USA.gov, and the Department of Defense.



- Enter the search information such as company name, individual name, DUNS number or CAGE Code.
- Click on the “Search” button.
- Any information that matches your search criteria will be returned
- Not all vendors are registered in SAM. If a vendor doesn’t come up during a search, the vendor doesn’t have an exclusion.

SAM
SYSTEM FOR AWARD MANAGEMENT

USER NAME: PASSWORD: [LOG IN](#)
[Forgot Username?](#) [Forgot Password?](#) [Create an Account](#)

[HOME](#) [SEARCH RECORDS](#) [DATA ACCESS](#) [GENERAL INFO](#) [HELP](#)

Search Records

Looking for entity registration records or entity exclusion records in SAM?

- * Use **Quick Search** if you know an entity's Business Name, DUNS number or CAGE code.
- * Use **Advanced Search** to structure your search using multiple categories and criteria.

Are you a Federal government employee?

- * Create a SAM user account with your government e-mail address [and log into SAM before searching](#) to see FOUO information and registrants who chose to opt out of the public search.

Conducting small business-focused market research?

- * In addition to what is contained in SAM, small businesses may supplement information about themselves in the SBA's [Dynamic Small Business Search](#).

QUICK SEARCH: Use one of the search bars below.

(Example of search term includes the entity's name, etc.)

DUNS Number Search:

CAGE Code Search:

[SEARCH](#) [Need Help?](#)

ADVANCED SEARCH: Use specific criteria in multiple categories to structure your search.

[ADVANCED SEARCH - ENTITY](#)

[ADVANCED SEARCH - EXCLUSION](#)

SAM | System for Award Management 1.0 IBM v1.1618.20140321-1442 WWW2

Note to all Users: This is a Federal Government computer system. Use of this system constitutes consent to monitoring at all times.

GSA



- If multiple results are returned with the same name, you will need to verify the address to determine if you are viewing the correct vendor. You can view the address by clicking on the “+” next to the “Status”
- If the indicator box is “green” and states “Entity” this vendor is not suspended or debarred. Wesleyan University can purchase goods/services from this vendor.
- When you are ready to search for the next vendor, click on the “Clear Search” button.

USER NAME **PASSWORD** **LOG IN**
[Forgot Username?](#) [Forgot Password?](#) [Create an Account](#)

HOME **SEARCH RECORDS** **DATA ACCESS** **GENERAL INFO** **HELP**

Search Results

Your search results represent the broadest set of records that match your criteria. You may get entity registration records that are still in progress or have been submitted, but not yet activated. Check the record status of each result and use the Search Filters to narrow your results. Of note, some entities have chosen to opt out of public display. Even if they are registered in SAM, you will not see their entity registration records in a public search. You can only see them if you are logged in as a Federal Government user. If you want to perform a new search, be sure to use the Clear Search button to remove your results. If you have a SAM user account and are logged in, you can use the Save Search button to run your current search again at a later time. [Important message regarding exclusion searches.](#)

Current Search Terms: sigma-aldrich inc*

[Clear Search](#)

TOTAL RECORDS: 1
Result page 1 of 1

Sort by **Modified Date** Order by **Descending**

FILTER RESULTS

By Record Status

☒ Active
☐ Inactive

By Functional Area

☐ Entity Management
☐ Performance Information

Apply Filters

Note: Filters are case sensitive

Your search for "sigma-aldrich inc*" returned the following results...

Entity	SIGMA-ALDRICH, INC.	Status: Active
DUNS: 832563121	CAGE Code: 54968	View Details
Has Active Exclusion?: No	DoDAAC:	
Expiration Date: 09/13/2014	Delinquent Federal Debt? No	

Result page 1 of 1

Save PDF **Export Results** **Print**

Glossary

Search Results

Entity

Exclusion

Search Filters

By Record Status

By Functional Area - Entity Management

By Functional Area - Performance Information



- If the indicator box is “purple” and states “Exclusion” this vendor is suspended or debarred. Wesleyan University cannot purchase goods/services from this vendor.



USER NAME

PASSWORD

LOG IN

Forgot Username?

Forgot Password?

Create an Account

HOME

SEARCH RECORDS

DATA ACCESS

GENERAL INFO

HELP

Search Results

Your search results represent the broadest set of records that match your criteria. You may get entity registration records that are still in progress or have been submitted, but not yet activated. Check the record status of each result and use the Search Filters to narrow your results. Of note, some entities have chosen to opt out of public display. Even if they are registered in SAM, you will not see their entity registration records in a public search. You can only see them if you are logged in as a Federal Government user. If you want to perform a new search, be sure to use the Clear Search button to remove your results. If you have a SAM user account and are logged in, you can use the Save Search button to run your current search again at a later time. [Important message regarding exclusion searches.](#)

Current Search Terms: daniel* hoffman*

Clear Search

TOTAL RECORDS: 1

Save PDF

Export Results

Print

Result page 1 of 1

Sort by: Modified Date

Order by: Descending

FILTER RESULTS

By Record Status

☒ Active

☐ Inactive

By Functional Area

☐ Entity Management

☐ Performance Information

Apply Filters

Note: Filters are case sensitive

Your search for "Daniel* Hoffman*" returned the following results...

Exclusion	Daniel Hoffman	Status: Active
DUNS:		
Classification: Individual		
Activation Date: 03/21/2014		
Termination Date: -		
Address: --		
City: Dorchester		
State/Province: WISCONSIN		
ZIP Code: 54425		
Country: UNITED STATES		
Excluding Agency: Risk Management Agency		

Glossary

Search Results

Entity

Exclusion

Search Filters

By Record Status

By Functional Area - Entity Management

By Functional Area - Performance Information

Result page 1 of 1

Save PDF

Export Results

Print