



BUILDING ON SUCCESS

IDAHO'S CHARTER SCHOOLS PROGRAM GRANT

BLUUM, INC.

March 2024

IDAHO'S BUILDING ON SUCCESS FOR FUTURE EXCELLENCE

US DEPT. OF EDUCATION
CHARTER SCHOOL PLANNING GRANT
CFDA 84.282A

PLAYBOOK



Alturas Academy, Idaho Falls

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COMMITMENT TO COLLABORATION

ABOUT BLUUM

Bluum is a non-profit organization committed to ensuring Idaho's children reach their fullest potential by cultivating great leaders and innovative schools. We work, in partnership with the J.A. and Kathryn Alberton Family Foundation, to help Idaho become a national model for how to maximize learning opportunities for children, especially for our educationally disadvantaged and rural students. Bluum believes that K-12 education should provide personalized school choice opportunities to meet the needs, interests, and skills of individual Idaho students so that they can grow and succeed in their choice of career, the military or in higher education.

We believe that school choice helps families, children and educators **achieve more** and **do better**. As our mission, we seek to:

- DEVELOP** Innovative Leaders
- GROW** Successful School Models
- SHARE** Research and Learning Innovations
- PROVIDE** School Support and Management Help

Bluum works to seek out, vet, and support high-performing models that are committed and capable of expanding their efforts in the Gem State. Bluum will provide support to school district improvement efforts that offer the possibility of transformative change for how learning and instruction are made available to students. Bluum is quickly becoming a go-to resource on educational research and innovation. Specifically, what's working, what's not, and how can Idaho become a national leader in improving its educational outcomes.

THE BACKSTORY

Authorized by title V, part B, subpart 1 of the Every Student Succeeds Act (ESSA, Public Law 114-95), which reauthorized the Elementary and Secondary Education Act of 1965 (ESEA), the federal Charter Schools Program (CSP) provides funding to State Entities (CFDA number 84.282A) with the purpose "to expand opportunities for all students, particularly traditionally underserved students, to attend public charter schools and meet challenging State academic standards; provide financial assistance for the planning, program design, and initial implementation of charter schools; increase the number of high-quality charter schools available to students across the United States; evaluate the impact of charter schools on student achievement, families, and communities; share best practices between charter schools and other public schools; encourage States to provide facilities support to charter schools; and support efforts to strengthen the charter school authorizing process."

The CSP State Entities program provides financial assistance to State Entities to support charter schools that serve elementary and secondary school students in a given state. Under the program, recipient State Entities make subgrants to eligible applicants for the purpose of opening new public charter schools and replicating and expanding high-quality public charter

schools. Grant funds may also be used to provide technical assistance to eligible applicants and authorized public chartering agencies in opening new charter schools and replicating and expanding high-quality charter schools, and to work with authorized public chartering agencies to improve authorizing quality, including developing capacity for, and conducting, fiscal oversight and auditing of charter schools. Public charter schools receiving subgrant funds under the CSP State Entities program also may serve students in early childhood education programs or postsecondary students.

The consortium of partners that has come together around **Idaho's Building on Success** federal CSP project successfully secured a federal Charter Schools Program grant in 2023 to lead the expansion of high-quality public charter schools across the state. Bluum, a Boise-based statewide nonprofit charter school support entity, is project lead. Bluum is joined in this work by the J.A. and Kathryn Albertson Family Foundation (JKAF). Other key partners include the Idaho State Department of Education and the Idaho State Board of Education.

PROJECT PURPOSE

Bluum, on behalf of **Idaho's Building on Success** project, has received a competitive grant under the federal Charter Schools Program for 2023-2028 in the amount of \$24,870,000 to enhance stakeholders' capacity to expand opportunities for students to attend excellent charter schools that meet and exceed state academic standards. Idaho's Building on Success project has three objectives to carry out within Idaho:

- 1) increase the number of quality Idaho charter school seats by no less than 5,900 students, especially for our most educationally disadvantaged and rural students through start- up, replication, or expansion;
- 2) support quality authorizing in Idaho while disseminating and supporting best authorizer practices statewide; and
- 3) evaluate and disseminate widely the successes and lessons of high-quality charter schools to impact the broader education system.

In carrying out these objectives, Idaho's **Building on Success** Charter Schools Program will provide subgrants to qualified charter school developers to provide financial support for the initial implementation of expanding, replicating, or opening a public charter school.

At least 90 percent of Idaho's federal CSP award will be utilized for competitive subgrants to eligible charter school subgrantees. At least seven percent will be utilized for state-level technical assistance activities and program evaluation/research, of which up to three percent is designated to supporting quality authorizing in Idaho. Finally, not more than three percent will be utilized by Bluum for the purposes of administering the program.

Measuring Academic Achievement

Within Idaho's accountability system, all required consistently underperforming subgroups are included in both federal reporting, as well as comprehensive and targeted school identifications.

- Economically-disadvantaged are students with a free or reduced-price lunch status.

- English learners are those who have not yet tested as English proficient.
- Major racial and ethnic groups include American Indian or Alaskan Native, Asian, Black or African American, Native Hawaiian or Pacific Islander, White, Hispanic or Latino.
- Students with disabilities are students that meet eligibility criteria as outlined in the Idaho Special Education Manual according to the Individuals with Disabilities Education Act (IDEA).

As indicated in Idaho’s approved Every Student Succeeds Act (ESSA), the long-term goal for English/Language Art and Mathematics is to reduce the percentage of non-proficient students by 33 percent over six years. “Proficient” means that a student has met or exceeded grade level standards in a specific subject as determined by performance on the associated assessment. Robust stakeholder feedback took place to set long-term goals for the state that achieve a balance of both ambitious and achievable.

In alignment with the Idaho’s Consolidated plan, a quality school will be defined as “a charter school meeting or exceeding the interim math and ELA targets” as follows:

Mathematics	2024	2025	2026	2027
All Students	61.1%	NA	NA	NA
Economically Disadvantaged	53.5%	NA	NA	NA
Students with Disabilities	43.5%	NA	NA	NA
English Learners	38.1%	NA	NA	NA
Black/African American	48.1%	NA	NA	NA
Asian or Pacific Islander	71.2%	NA	NA	NA
American Indian or Alaskan Native	46.3%	NA	NA	NA
Hispanic or Latino	48.0%	NA	NA	NA
Native Hawaiian/Other	55.7%	NA	NA	NA
White	64.4%	NA	NA	NA
Two Or More Races	61.5%	NA	NA	NA

ELA/Literacy	2024	2025	2026	2027
All Students	68.7%	NA	NA	NA
Economically Disadvantaged	60.4%	NA	NA	NA
Students with Disabilities	43.3%	NA	NA	NA
English Learners	37.9%	NA	NA	NA
Black/African American	56.1%	NA	NA	NA
Asian or Pacific Islander	76.7%	NA	NA	NA
American Indian or Alaskan Native	53.7%	NA	NA	NA
Hispanic or Latino	55.7%	NA	NA	NA
Native Hawaiian/Other	64.5%	NA	NA	NA
White	71.9%	NA	NA	NA
Two Or More Races	69.7%	NA	NA	NA

PROJECT SUPPORT

Outside of the important relationships with partners, this project both requires and embraces significant support from other stakeholders, inclusive of high-quality charter management organizations, key legislative models and communities within Idaho seeking new educational opportunities for students.

Letters of Support

Idaho's Building on Success proposal received significant and wide-ranging support from stakeholders. This support ranged from Governor Brad Little to the Idaho Congressional Delegation to individual charter school leaders. All letters of support can be found here: <https://csp.bloom.org/wp-content/uploads/2023/09/Appendix-C-Letters-of-Support.pdf>

Consultant Network

The work of implementing a project of this scale cannot be done on the reliance of one of two individuals as it requires a vast array of expertise. Our project, due to the support of our partner organizations, leverages the expertise of a supportive consultant network. We seek to build capacity that is relevant, experienced, and sustainable for only the work required. Our procurement practice is rigorous. We leverage our national networks to seek the most qualified consultant for each task.

STAKEHOLDER FEEDBACK

The development of this grant project was done with intentional stakeholder feedback inclusive of high-quality school leadership teams, parents and students. In order to achieve the grant objectives and performance metrics, continued stakeholder feedback is necessary to identify best practices and provide relevant and meaningful technical assistance that helps partner schools move towards quality practices and excellent outcomes.

Communications Protocol

Bloom will be intentional in leveraging opportunities to learn from charter stakeholders and CSP grant partners. This protocol will include:

- A. **Ongoing Communication with Subgrantees.** Bloom will host several one-on-one debrief sessions as part of the Technical Assistance (TA) strategy. These sessions will identify gaps in the academic model allowing grant partners to reassess the investment of grant resources or seek additional resources.
- B. **Personalized Real Time Attention.** As the Idaho program is relatively small (13 to 15 subgrants over five years) it is possible for all partners to communicate with Bloom staff as often and as needed as they like. We expect this to be a tight knit cohort of partners.
- C. **Annual TA Workshops.** Each autumn of the grant-term Bloom coordinates with the Idaho Public Charter School Commission (PCSC) and outside experts in developing and leading training that supports charters in the effective implementation of CSP funds and federal programs.

Building on Success

After each round of competition, awarded CSP subgrantees will become a **Building on Success** cohort with the purpose of supporting one another in the quest for quality. Building on the expertise of consortium partners (including existing schools), we channel local energy and inspiration for better school options with the expertise and supports necessary for launching and expanding successful charter schools. Idaho's working consortium includes expertise in:

- charter school finance and operations,
- facilities development and financing,
- school leader recruitment and development,
- grant-making and management,
- governance and law,
- academics, special education, and
- teaching and learning.

DEFINING INFRASTRUCTURE

The establishment of systems and processes to properly manage and lead a Federal CSP grant requires several areas of expertise including:

Legal

The instrument used between Bluum and subgrantees will be a Grant Award Letter of Agreement. This legal document will clearly articulate the terms of funding, allowable funding and the possibility and process for grant revocation.

Security

All exchange of information, be it student academic reports or financial reimbursement requests, is a top priority. To ensure security is in place at all levels, Bluum has adopted internal security policies and procedures.

FERPA

Bluum takes seriously its obligation to protect the privacy of student Personally Identifiable Information (PII) collected, used, shared, and stored. Therefore, Bluum has contracted with Redfish Metrics for all necessary analyses of student data. All program evaluation data utilized by Bluum will be collected in the aggregate and will be used, shared, and stored in compliance with state and federal laws.

HIPPA

While Bluum will not be requesting individualized student files, it is recognized that HIPPA compliance may be relevant in discussions around IEP's or other IDEA compliance support. Bluum will ensure all

student specific cases shared during TA or coaching sessions will maintain anonymity and confidentiality.

REQUEST FOR APPLICATION

TIMELINES

Competition 1 Spring 2024	
Date	Federal CSP Subgrant Activity
May 16, 2024	Communication Blitz
May 07, 2024	Introductory Technical Assistance Webinar
May 22, 2024	Open RFP
May 22, 2024	Charter School Training (Boise - virtual)
Jun 07, 2024	RFP Close
Jun 12, 2024	Reviews Finalized
Jun 17, 2024	Management & Capacity Reviews Completed
Jun 17, 2024	Notice of Awards
Jun 20, 2024	Schedule Post Award Training (2 hours, online)
Jul 1, 2024	\$ Begins to be Disbursed to Sub Recipients

All dates are subject to change. The most updated grant calendar can be found at <https://csp.bluum.org/>.

Competition 2 Winter 2025	
Date	Federal CSP Subgrant Activity
Jan 02, 2025	Communication Blitz
24/7 Online	Introductory Technical Assistance Webinar
Jan 08, 2025	Open RFP
Jan 08, 2025	Charter School Training (Boise - virtual)
Feb 05, 2025	RFP Close
Feb 21, 2025	Reviews Finalized
Feb 26, 2025	Management & Capacity Reviews Completed
Mar 03, 2025	Notice of Awards
Mar 03, 2025	Schedule Post Award Training (2 hours, online)
Apr 1, 2025	\$ Begins to be Disbursed to Sub Recipients

Competition 3 Spring 2025	
Date	Federal CSP Subgrant Activity
Apr 02, 2025	Communication Blitz
24/7 Online	Introductory Technical Assistance Webinar
Apr 09, 2025	Open RFP
Apr 09, 2025	Charter School Training (Boise - virtual)
May 07, 2024	RFP Close
May 23, 2025	Reviews Finalized
May 28, 2025	Management & Capacity Reviews Completed
Jun 02, 2025	Notice of Awards
Jun 02, 2025	Schedule Post Award Training (2 hours, online)
Jul 1, 2025	\$ Begins to be Disbursed to Sub Recipients

Competition 4 2026 TBD	
Date	Federal CSP Subgrant Activity
TBD	Communication Blitz
24/7 Online	Introductory Technical Assistance Webinar
TBD	Open RFP
TBD	Charter School Training (Boise - virtual)
TBD	RFP Close
TBD	Reviews Finalized
TBD	Management & Capacity Reviews Completed
TBD	Notice of Awards
TBD	Schedule Post Award Training (2 hours, online)
TBD	\$ Begins to be Disbursed to Sub Recipients

Competition 5 2027 TBD	
Date	Federal CSP Subgrant Activity
TBD	Communication Blitz
24/7 Online	Introductory Technical Assistance Webinar
TBD	Open RFP
TBD	Charter School Training (Boise - virtual)
TBD	RFP Close
TBD	Reviews Finalized
TBD	Management & Capacity Reviews Completed
TBD	Notice of Awards
TBD	Schedule Post Award Training (2 hours, online)
TBD	\$ Begins to be Disbursed to Sub Recipients

All dates are subject to change. The most updated grant calendar can be found at <https://csp.bloom.org/>.

PLANNING GRANTS

Idaho's **Building on Success** Charter Schools Program planning subgrants are designed to be for a period of up to 18 consecutive months of planning activities to prepare for the successful opening of a new school, replication school, or expansion project.

IMPLEMENTATION GRANTS

Building on Success subgrants are designed to be for a period of up to 24 consecutive months of implementation activities following the opening of a new school, replication school, or expansion project. CSP subgrants are subject to an annual renewal process. The renewal process to continue grant funding is not competitive but is subject to available federal funds.

DETERMINATION OF AVAILABLE FUNDING

Building on Success subgrants are designed to be for a period of up to 18 months of planning and 24 consecutive months of implementation activities following the opening of a new school, replication school, or expansion project. Each year the funding amount to be awarded for Idaho's **Building on Success Charter** Schools Program subgrants will be determined as follows:

- A. **Assess Budget Availability.** Bloom will consider all committed funds and USDOE released funds to determine the total available funds for the upcoming year.
 1. Document the total funds awarded to date and compare to the budgeted total funds to be awarded. If previous year awards were lower than anticipated, or if a grant has been revoked, the surplus funds may be added to the current year budget.
 2. Allocate the total current year funding budget between all planned grant competitions, taking into consideration the phasing of payouts.
- B. **Allocate Available Funds to Types of Subgrants.** Available funds will be divided into three categories based on applicant eligibility to carry out of the following eligible subgrant activities: (1) Open and prepare for the operation of new charter schools (2) Open and prepare for the operation of replicated high-quality charter schools and (3) Expand high-quality charter schools.
 1. Current data will be reviewed to determine progress against goals and to identify trends in growth. This may include looking at startup groups in the pipeline and market research studies conducted within various communities. If original projections are not aligned, a request for a change in scope will be provided to USDOE.
 2. Total available and approved funds will be split appropriately between the three types of subgrants based on the conducted market research and pipeline analysis.
- C. **Allocate Available Funds to Grant Program.** Available funds will be divided into two subgrant categories of (1) Planning and (2) Implementation.
 1. An analysis on the total dollars allocated versus spent for planning will be conducted. As part of this analysis, the team will study allowable expenditures to determine the

- demand for planning grants and the adequate dollar figure. If original projections are not aligned, a request for a change in scope will be provided to USDOE.
2. Based on the determination and approval by USDOE of allocations to planning grants, the remaining available funding will be split between the two phases of Implementation.

Key Responsibility

The determination of available funding will be led by the Bluum finance team.

Timeline

The determination of total available funding will be done by October 31st of each grant year and be determined through September 30th of the following year. All surplus funds following the November competition will be carried forward to the following competition.

ANNOUNCEMENT

The Request for Application competition will be announced twice in calendar year 2024 following these steps:

- A. **Coordination of TA Sessions.** Includes all virtual information sessions and in-person required sessions around the state. Coordination must occur with all key project staff and allow for adequate planning time for subgrantees.
 1. A preferred schedule will be developed based on the anticipated RFA window open date.
 2. All calendars for key staff must be checked against the preferred dates and adjusted as needed.
 3. All descriptions for Technical Assistance are reviewed, finalized, and posted on the website with descriptions of content.
- B. **Introductory Technical Assistance Webinar.** This webinar will focus on the criteria for eligibility and the details of the application process including all required elements and key timelines.
 1. Initiate communication on registration at LEAST two weeks prior to the webinar date. Modes of communication may include social media, website, or email communication using maintained lists.
 2. Prepare agenda based on lessons learned from previous delivery of content.
 3. Post recorded webinar online.
- C. **Review of Timeline.** Once TA is scheduled, a full review of the anticipated timeline will take place, ensuring adequate preparation time is in place for grant applicants, reviewers, and executive overview.
 1. Conduct a final review of the timeline against key staff calendars and workload.
 2. Conduct a final review of the timeline, with focus on key due dates, to ensure adequate time is allowed for a comprehensive application to be drafted.
 3. Finalize and publish official schedule.

Key Responsibility

The Director of Federal Grants and Support will lead this process.

Timeline

The finalization of key dates and times for REQUIRED participation and key deadlines should take place at least two months previous to the anticipated open date for the RFA window.

SUBMISSION PROCESS

Subgrantee Eligibility Screening

In order to demonstrate its ability to create a high-quality charter school, the eligible applicant will submit its approved charter petition and any supplemental information necessary to demonstrate completion of the requirements outlined in Bluum's application process. To be eligible to apply for this federal CSP subgrant, applicants:

- A. Must have an [approved charter school petition](#) from an Idaho authorizer.
- B. Must conform to the federal definition of a public charter school in the [Elementary and Secondary Education Act](#).
- C. Must seek to serve a representative student population by seeking to achieve a combined average of non-white, English Language learner, special needs, and economically disadvantaged students that is no less than five percent below the local representation for this combined group.
- D. Must confirm compliance in the "Compliance Check List: Certifications and Assurances."
- E. Must provide academic data showing scores higher than the state averages for ELA and Math for growth and proficiency, as defined by ESSA. (Only applicable to replication and expansion models).

Virtual charter schools are not eligible to apply.

Application

For those that meet all required criteria, the Building on Success rigorous Request for Application (RFA) and Peer Review process for selecting exemplary applicants for CSP funding will constitute an important first step. The RFA seeks to identify quality eligible applicants that have the capacity to meet the program objective of serving more students, especially disadvantaged and rural students. The CSP subgrant application is structured to parallel the Idaho Public Charter School Commission's charter school petition structure and serve as a school's business plan for the project; therefore, schools should ensure that all the required elements accurately reflect the unique attributes of their schools.

Any application that has been plagiarized in whole or in part, or lacking in uniqueness/innovation, may be denied. Applicants should ensure the application is unique and are encouraged to pay special attention to justifying the need in the community and the level of buy-in from the community. Additionally, all schools must meet the expansion definition and criteria below.

Replication of a High-Quality Charter School

Replication means to open a new charter school, or a new campus of a high-quality charter school, based on the educational model of an existing high-quality charter school under an additional charter.

Expansion of a High-Quality Charter School

Expansion means an increase in the student count of the existing school, which may be spread across multi-year grade expansions.

High-quality for start-up schools

- Evidence of a committed board of trustees that own the charter school process and have the demonstrated capacity to deliver for children and families.
- Identified quality instructional leader who is either experienced or proven in running a high-performing school and/or have received first-class charter specific training.
- Demonstrated ability to attract, recruit, retain and develop top teaching talent.
- Sustainable business plan as approved by authorizer.
- Well-conceived facility plan.
- Evidence of market-demand for the school.
- Innovative and effective learning model that meet the needs of disadvantaged and/or rural students.
- Defined and clear transportation plan for students.

Replication or Expansion of an existing High-Quality Charter School

- Evidence of strong academic results, including above state average growth and proficiency on ISAT.
- No significant issues identified by authorizer in areas of student safety, school finance, operational management, or statutory/regulatory compliance.
- Success in significantly increasing student achievement, including graduation rates, for all students and for each subgroup defined by ESSA (e.g. economically-disadvantaged, students with disabilities, Hispanic or Latino, and ELL).
- Good standing with authorizer and lenders.
- Evidence of a student waitlist.
- Evidence of strong and stable leadership and governance.

Certifications and Assurances

The following are the certifications and assurances all subgrantees must meet to maintain grant eligibility:

- A. Subgrant funds will be expended during the specified grant period; standard accounting procedures will be utilized by subgrant recipients and records of all subgrant expenditures will be maintained in an accurate, thorough, and complete manner.
- B. Subgrant recipients confirm their understanding that funds for planning and implementation activities will be awarded only if they are an open and operating school or have an approved charter school petition from an Idaho authorizer and plan to open with 18 months.
- C. Subgrant recipients will participate in all data reporting and evaluation activities as requested or required by the U.S. Department of Education, Bluum, and the school's authorizer, including on-

site and desktop monitoring conducted by Bluum, annual independent audits required by the state that are publicly reported and include financial statements prepared with generally accepted accounting principles, annual reports, and a final expenditure report for the use of subgrant funds. This section includes participation in any federal or state funded charter school research or evaluations. Failure to submit required information may result in a withholding of grant funds or a non-renewal of subsequent year funding within the project period.

- D. Subgrant recipients will expend implementation funds only for the purpose of implementation activities in a charter school which is nonsectarian in its programs, admissions, policies, employment practices, and all other operations, and which will be in compliance with all Idaho laws and administrative rules regarding staff certification and licensure.
- E. Subgrant Recipients will be aware of and comply with federal laws including, but not limited to, complies with the Age Discrimination Act of 1975, title VI of the Civil Rights Act of 1964, title IX of the Education Amendments of 1972, section 504 of the Rehabilitation Act of 1973, the Americans with Disabilities Act of 1990 (42 U.S.C. 12101 et seq.), section 444 of the General Education Provisions Act (20 U.S.C. 1232g) (commonly referred to as the “Family Educational Rights and Privacy Act of 1974”), and part B of the Individuals with Disabilities Education Act, and federal regulations applicable to the federal Charter Schools Program, including the Education Department General Administrative Regulations in 34 CFR parts 75-77, 79, 81, 82, 84, 97, 98, and 99, the Office of Management and Budget Guidelines to Agencies on Government wide Debarment and Suspension (Nonprocurement) in 2 CFR part 180, as adopted and amended as regulations of the U.S. Department of Education in 2 CFR part 3485, and The Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards in 2 CFR Part 200, as adopted and amended in 2 CFR part 3474.
- F. Subgrant recipients will comply with all state and local laws and health and safety requirements applicable to Charter Schools, including but not limited to all laws related to student admissions and enrollment, non-discrimination, data reporting, compulsory student attendance, and accountability.
- G. Subgrant recipients will comply with all provisions of the Public Charter Schools Program of the U.S. Department of Education, including compliance with activities allowable for implementation funds. This section requires compliance with the Nonregulatory Guidance for CSP funds.
- H. Subgrant recipients ensure that the Charter School will receive funds through programs administered by the U.S. Department of Education under which funds are allocated on a formulary basis.
- I. Subgrant recipients shall include important information on the website of the school to help parents and the community to make informed decisions about the education options available to their children, including information on the educational program, student support services, parent contract requirements (including any financial obligations or fees and information regarding textbook assistance), and enrollment criteria. This section requires the school to provide annual performance and enrollment data for the student body and subgroups of students to Bluum or its designator researcher in order to share through research and grant reports.
- J. It is the responsibility of each Charter School that receives funds under this grant to comply with all required federal assurances. Any Charter School that is deemed to be in

noncompliance with federal or state statute and fails to address areas of noncompliance will not be funded.

- K. Funded schools will be expected to cooperate with Bluum in the development of certain reports to meet state and federal guidelines and requirements. Funded projects will be required to maintain appropriate fiscal and program records.
- L. Funded schools will be required to participate in desktop and on-site monitoring activities. If any findings of misuse of funds are discovered, project funds must be returned to Bluum. Bluum may terminate a grant award upon thirty days' notice if it is deemed by Bluum that the school is not fulfilling the funded program as specified in the approved project or has not complied with the signed assurances.
- M. It is the responsibility of each Charter School that receives funds under this grant to provide Bluum with evidence of criminal background checks for board members and school staff.
- N. The recipient school's board certifies that the Charter School is in compliance with the requirements of the federal Children's Internet Protection Act.
- O. Recipient schools and their authorizer will be aware of and comply with Executive Order 13513, "Federal Leadership on Reducing Text Messaging While Driving," October 1, 2009, by acknowledging that grant recipients and their personnel are prohibited from text messaging while driving a government owned vehicle, or while driving their own privately owned vehicle during official grant business, or from using government supplied electronic equipment to text message or email when driving.
- P. Recipient schools shall ensure that students enrolled in the charter school will be taught the United States Constitution each year on September 17, Constitution Day (<https://www2.ed.gov/policy/fund/guid/constitutionday.html>).
- Q. The recipient school and their authorizer certify that the Performance Certificate agreed for the school articulates that student achievement is one of the most important factors for renewal or revocation of the school's charter and that the authorizer reserves the right to revoke or not renew a school's charter based on financial, structural, or operational factors involving the management of the school, or if not agree to amend the Performance Certificate accordingly to include these elements before award monies are distributed.
- R. Recipient schools and their authorizer certify that a high degree of autonomy is built into its charter contract consistent with the requirements of ESEA § 4310 (2) and ESEA § 4303 (f)(2)(A), and that they have sought, or will seek, all the appropriate automatic and other waivers to support the level of autonomy negotiated in their charter contract.
- S. The recipient school and their authorizer certify that any CSP subgrant deliverable created in whole, or in part, with federal CSP funds will be openly and publicly licensed, unless otherwise excepted, per 2 CFR part 3474.20(c).
- T. The recipient school is required to adhere to Executive Order 12549, Debarment and Suspension, as implemented as 2 CFR 180.200, which requires that recipients do not employ or use contractors that are indicated on the federal debarment listing.
- U. The recipient school agrees not to use a Weighted Student Lottery for school admissions.

Budget Template

Idaho's **Building on Success** program is a reimbursement program, which means recipients will be reimbursed following proof of expenditures on allowable, approved activities. The CSP subgrant purpose is to provide financial support for the initial operations of an expanding or newly established charter school. Subgrants can only be used for costs associated with expanding, replicating, or opening a public charter school. Subgrant activities refer to only those activities that occur during: (a) planning of school (up to 18 months); (b) first-year implementation of a new school; or (c) second-year implementation of a new school or school expansion cohort. Grant expenditures for implementation are limited to 24 continuous months.

Under the allowable activities described in the ESEA 4303 (h), grant funds must be used for the following:

1. Preparing teachers, school leaders, and specialized instructional support personnel, including through paying costs associated with –
 - a. Providing research-based professional development for teachers and other staff that includes national staff development standards; and
 - b. Hiring and compensating, during the eligible applicant's planning period specific in the application for funds, one or more of the following: (i) Teachers. (ii) School Leaders. (iii) Specialized instructional support personnel.
 - c. Travel costs for school leaders, staff, and school board to attend conferences and training, or visiting other charter schools.
2. Acquiring supplies, training, equipment (including technology), and educational materials (including developing and acquiring instructional materials or aligning curriculum).
3. Carrying out necessary renovations to ensure that a new school building complies with applicable statutes and regulations, and minor facilities repairs (excluding construction).
4. Under ESEA 4303 (h)(4), providing one-time startup costs associated with providing transportation to students to and from the charter school.
5. Carrying out community engagement activities, which may include paying the cost of student and staff recruitment and informing the community about the school.
6. Providing for other appropriate, non-sustained costs related to opening, replicating, or expanding high-quality charter schools when such costs cannot be met from other sources.
7. Under ESEA 4303(h)(3), grantees may use CSP funds to carry out "necessary renovations to ensure that a new school building complies with applicable statutes and regulations, and minor facilities repairs (excluding construction)."

To ensure proper allocation of funds and alignment to common practices, a budget template (see below), is required for applicants.

GL Account	Account Description (feel free to modify)	Year 1	Year 2	Grand Total	Description
		Oct 1, 20__ to Sep 30, 20__	Oct 1, 20__ to Sep 30, 20__		
Staffing:					
285-512110-000-000-0	ELEMENTARY CERTIFIED STAFF	\$ 37,000.00	\$ -	\$ 37,000.00	Pre-opening teacher salary cost in year 1.
285-512210-000-000-0	ELEMENTARY EE BENEFITS - PERSI	\$ 4,188.40	\$ -	\$ 4,188.40	Pre-opening teacher retirement benefit.
285-512220-000-000-0	ELEMENTARY EE BENEFITS - TAXES	\$ 2,830.50	\$ -	\$ 2,830.50	Pre-opening teacher FICA and Medicare.
285-512240-000-000-0	ELEMENTARY EE BENEFITS - INSURANCE	\$ 4,680.00	\$ -	\$ 4,680.00	Pre-opening teacher Insurance cost.
285-641115-000-000-0	SALARIES - ADMIN CLASSIFIED STAFF	\$ 42,000.00	\$ 43,200.00	\$ 85,200.00	Curriculum development staff, full time years 1 and 2.
285-641210-000-000-0	ADMIN EE BENEFITS - PERSI	\$ 4,754.40	\$ 4,890.24	\$ 9,644.64	Curriculum development staff retirement benefits.
285-641220-000-000-0	ADMIN EE BENEFITS - TAXES	\$ 3,213.00	\$ 3,304.80	\$ 6,517.80	Curriculum development FICA and Medicare.
285-641240-000-000-0	ADMIN EE BENEFITS - INSURANCE	\$ 4,680.00	\$ 5,120.00	\$ 9,800.00	Curriculum development staff insurance benefits.
Professional Development:					
285-621390-000-000-0	PROF DEV - INSTRUCTORS PURCHASED SVCS	\$ 3,000.00	\$ -	\$ 3,000.00	
285-621380-000-000-0	PROF DEV - INSTRUCTORS TRAVEL	\$ 3,000.00	\$ -	\$ 3,000.00	
Supplies:					
285-512440-000-000-0	Curriculum - ELEM	\$ -	\$ -	\$ -	
Technology (Equipment):					
285-512500-000-000-0	Technology - Student - Elem	\$ 50,000.00	\$ 25,000.00	\$ 75,000.00	Chromebooks and peripherals at \$500 per student, 100 students year 1, 50 students year 2.
285-632500-000-000-0	Technology - School (general)	\$ 25,000.00	\$ -	\$ 25,000.00	Servers, network equipment, wireless routers, security equipment based on the following assumptions/quotes: xxxxx
Facility costs to meet code:					
285-663530-000-000-0	Safety/Code Required Facility Renovation Costs	\$ 90,000.00	\$ -	\$ 90,000.00	Elevator costs including design, architecture fees, permits, installation and equipment.

Additionally, a three-year operational budget is required as part of the application to ensure that the academic model is sustainable post-grant. The three-year budget is based on the school's fiscal years (July 1 to June 30).

Budget Checklist

The following checklist will be used to evaluate the budget. The grant and/or budget narrative includes information that allows the reviewer to determine whether the school is compliant with these requirements.

BUDGET CHECKLIST	Check for "Yes"	Check for "N/A"
Budget conforms to General Guidelines and Restrictions, meets all allowable and unallowable cost restrictions, and accounts for the entire grant award.		
Budget supplements, not supplants, State and local funding, and budget is focused solely on the purpose and goals of this CSP subgrant proposal.		
Costs provided for budgeted line items are specific (including cost per unit and number of units), not vague or estimated.		
Budget does not include construction or extended salaries.		
Budget does not include recurring costs once designated revenue is available for those items.		
Budget does not include items that will be utilized by grade levels or student groups not intended to be covered by the grant, e.g., pre-K (unless a waiver is secured) or existing students outside the scope of an expansion project.		
Three-year budget submitted to the state-approved authorizer demonstrates that the applicant will maintain financial sustainability after the end of the subgrant period.		

Required Technical Assistance (TA)

The following technical assistance is considered essential to successful implementation of a submitted grant project:

- A. **CSP Subgrant Pre-Award Training.** This *required pre-award* session will be held virtually, at the beginning of each competition, to prepare prospective applicants with the knowledge to prepare an application that is aligned to the CSP project goals and to build a supporting project budget around allowable expenses. Further, this session will introduce prospective applicants to the process of budgeting using the base plus model to protect against supplanting. Applicants will be provided an eligibility check list, critical timelines and be connected to other technical assistance, from Bluum and its consortium partners, as needed.
- B. **Individual Completeness Check (Desktop Review).** This *required post award* check-in will focus on improving quality outcomes for all students in subgrantee schools. The **Building on Success** will be built around the ESSA aligned quality measures and introduce protocols for performance tracking, monitoring, reporting, and sharing. Further, this session will introduce subgrantees to best practice in the transition between planning and implementation activities as well as fiscally compliant accounting and financial management practices.

Other Available Technical Assistance

Bluum will coordinate and offer Charter School Training to ensure that quality charter school developers and operators are able to learn about the opportunity to apply for funding through this project. This project builds on the current work of the Idaho State Department of Education and the Idaho State Board of Education, including the Idaho Public Charter School Commission, that includes:

- A. ***New Charter Petitioner Guidance.*** Although statute and administrative rule provide information regarding the required contents of a charter petition, petitioners often request additional guidance regarding the scope and nature of information their charters should include. The guide takes petitioners through the development of a high-quality charter petition to maximize their chances of approval.
- B. ***Pre-Opening Guidance.*** The PCSC's pre-opening guidance includes interactive project management tools, resources, and advice on topics ranging from employee recruitment to governance training, and a series of one-on-one meetings to exchange information and support.
- C. ***New School Leader Orientation.*** Many public charter schools hire administrators who have not previously worked in the charter school sector. They face new challenges as they adjust to leading not only a school, but a charter LEA. The PCSC offers written and in-person orientation materials to introduce new administrators to the role of the authorizers, charter-specific requirements and expectations, and resources available to support their work.
- D. ***Charter Start 101.*** This annual workshop led by the Idaho State Department of Education (SDE) provides guidance on legal and compliance requirements to new school operators. School administrators that participate in this annual meeting are registered for Idaho's "Consolidated Federal and State Grants Application" (CFSGA) portal. Through this portal charters can apply for federal funds, report on the funds as needed, and certify compliance with all appropriate rules and regulations. Through this training, CFSGA portal, and ongoing process, charter schools can access all federal Title dollars available to their students while ensuring they receive their commensurate share of federal support.
- E. ***Strategic Budgeting Workshop.*** All applicants are required to present a long-term sustainable budget providing ample support for the proposed academic model beyond the CSP grant support. This individualized session will provide an interactive approach to strategic budgeting, allowing for teams to receive individualized coaching and support in addition to whole group instruction. Awarded subgrantees will explore several examples of value-added budgeting practices required in the CSP competition and practice using strategies for prioritization of investment when faced with limited resources. Participants will be provided with a budgeting template.
- F. ***Board Development Workshop.*** High-quality school models begin with strong governance structures. This workshop will introduce board members to the best practice strategies of governance and oversight for a charter school. Topics will include the development of board and leader evaluations, capacity development of staff and leaders, strategic visioning for growth within a clear mission, and the balance of sustainability in all stages of enrollment. Additionally, participants will explore measures of student quality and strategies for monitoring progress using interim benchmarks.
- G. ***Direct Technical Assistance.*** Bluum will coordinate technical assistance training throughout the year to address issues specific to the federal CSP grant and best practices for effective charter

schools. Bluum will work with the PCSC and partner organizations that have staff capacity and expertise in providing effective technical assistance to **Building on Success** partners.

Resources

The Idaho Public Charter School Commission and Idaho State Department of Education offer a wealth of charter-related resources – links, tools and templates covering operations, finance planning, Performance Framework, and more including:

- 1) [Charter 101 Workshops](#)
- 2) [Accountability](#)
- 3) [Idaho Public Schools Report Card](#)
- 4) [Assessment Resource Center](#)
- 5) [Pre-Opening Checklist and Timeline](#)
- 6) [Board and Governance](#)
- 7) [Supporting Organizations](#)
- 8) [PCSC Policies](#)
- 9) [Charter Petitions](#)

For the most updated list of resources visit the Bluum website at <https://csp.bluum.org/building-on-success-technical-assistance/>

Key Responsibility

The determination of required and optional technical assistance will be led by the Chief Financial Officer.

Timeline

The determination of required technical assistance will be made at LEAST two months prior to the anticipated RFA window opening. Optional TA will be updated as modifications are needed. The most updated list of TA opportunities can be found at <https://csp.bluum.org/>.

REVIEW PROCESS

REVIEWER SELECTION

To ensure subgrants are awarded to the most capable applicants, each proposal for a CSP subgrant will be reviewed by an external Peer Review panel. The *Idaho Independent Peer Review Panel* will be comprised of teams of two reviewers, selected through an application process. Individuals selected as peer reviewers must be well informed regarding education, education policy, evaluation, and operations of public charter schools.

Each selected reviewer must sign an assurance regarding conflict of interest to ensure that all applications are reviewed in a bias-free manner. Reviewers will be required to recuse themselves from the evaluation of any application for which they have a perceived or real conflict of interest.

Additionally, reviewers will sign a project contract highlighting the scope of work and the confidential nature of the role and certify the final scores prior to submission and will not share any information related to application scores.

REVIEWER TRAINING

The *Idaho Independent Peer Review Panel* will receive training on the effective use of the Selection Criteria rubric to rate potential subgrant proposals. Using the Selection Criteria rubric included in the Building on Success RFA, each reviewer will evaluate completed applications and assign a score.

The goals for the Peer Review training are as follows:

- Receive a program overview of the CSP grant including background, goals, performance measures, and eligibility requirements;
- Understand the connections between the application grant narrative and the budget documents to determine how well the RFA's Project Budget Summary and Budget Narrative support the stated project goals;
- Become familiar with the RFA, particularly the scoring rubric, and the details of the review process;
- Learn how to access and use the Bluum grant management system;
- Evaluate a sample application using the scoring rubric found in the RFA to ensure alignment across the reviewers;
- Review steps after scoring rubrics have been completed including adding comments about the application's strengths and areas of weakness; and,
- Discuss timelines.

EVALUATION RUBRIC

Each applicant must convince the *Idaho Independent Peer Review Panel* that the proposal will result in a quality educational program. Special focus will be placed on the applicant's soundness of planning and the ability to link the specific activities described in the grant project to the charter school's educational vision and enhanced levels of student academic achievement as measured by Idaho's state assessment system. The process of review is as follows:

1. Prior to the release of the RFA, the Bluum team will evaluate the effectiveness of the Selection Criteria rubric in predicting high-quality models and make any modifications deemed appropriate. All evidence influencing a change in the rubric will be documented and maintained.
2. Final rubric will be available at [2024 Request for Applications for Federal CSP Grant Support](#) beginning May 22, 2024.

APPLICATION TOTAL POINTS		
Rubric Section	Points Awarded	Points Possible
A. Grant Project Goals		10
B. Educational Philosophy, Instructional Practices, and Curriculum		20
C. Teaching and Learning		6
D. Student Academic Achievement Standards		9
E. Student Demand and Community/Local Support		10
F. Effectively Serving All Students		12
G. Staffing and Professional Development Plan		4
H. Financial Management and Monitoring Plan		7
I. Board Capacity and Governance Structure		12
J. School Leadership and Management		10
STANDARD POINTS AWARDED		100
Priority Points: 2 Additional Points may be awarded for schools that articulate a plan to serve and intentionally meet the unique needs of students in rural geographic areas.		2
Priority Points: 2 Additional Points may be awarded for schools that provide a high-quality high school program.		2
Priority Points: 2 Additional Points may be awarded for schools that articulate a plan to serve and intentionally meet the unique needs of a student population of more than 50% economically disadvantaged students.		2
Priority Points: 2 Additional Points may be awarded for schools that serve a 100% at-risk student population.		2
Priority Points: 2 Additional Points for schools authorized by a public school district.		2
TOTAL POINTS AWARDED		110
Reviewer Comments:		

PRE-PEER REVIEW COMPLIANCE CHECK

Bluum will conduct the final review of all applications to ensure that applications comply with all requirements.

1. Verification of assurances will be conducted by the Executive team including the following:
 - a. All submitted documents must match their descriptions.
 - b. All required templates were adequately completed.
 - c. All disqualifying factors have been cleared.
 - d. All required quality control measures are submitted.

- e. All contracts, including with ESP, are appropriately funded.
- f. All funding eligibility will be reviewed against bonus criteria.

SCORING AND RANKING

CSP subgrants are awarded on a competitive basis according to the scores earned on the published Selection Criteria rubric. There is no guarantee that submitting a proposal will result in funding, or funding at the requested level. The rubric will be used by reviewers to evaluate the application as whole for a total of 100 points.

Priority points will be applied for applicants demonstrating they meet the criteria for each, allowing a total possible score of 110 points. In order for the application to be recommended for funding, applicants must score at least 87 points out of the possible 110 points, and all required parts must be addressed. The applicant's final score will be an average of a review team's scores.

The CSP subgrant is competitive; therefore, high scores from the *Idaho Independent Peer Review Panel* increases an application's likelihood of approval and receipt of funding. If more schools meet the criteria to be funded than there are funds available, applications will be ranked to make final decisions about which schools are funded.

Should additional funds remain, applications that score below 87 points may be asked to submit revisions that would bring the application up to a fundable level. Bluum management will conduct the final review of all applications to ensure that applications comply with all requirements and will determine the final budget for each subgrant recipient after evaluating whether proposed activities are reasonable, allowable, and necessary.

AWARD PROCESS

EXECUTIVE REVIEW

Bluum executive leadership will conduct the final review of all applications including the following steps:

1. Executive leadership will receive all peer review results, scores and comments.
2. Executive leadership will review all results and determine any additional requirements.
3. If applications achieving a score above the set cut point, executive leadership will review the total funds requested to make a determination of available funding. If sufficient funds are not available, all applications will be ranked by score; the top six ranked applications will receive full funding and additional applications may receive a reduced award or no award.
4. Executive leadership will document any required technical assistance as a condition of the award; all timelines for completion will be noted for updates in the management plan.

BUDGET REVIEW

Funds should not be spent or encumbered until the grant has received final approval, unless otherwise directed in writing. The budget review will include the following steps:

1. Final verification on funding availability and assignment of funds to awarded grant recipients.
2. Funding eligibility for each application will be verified.

3. Budget allocations will be reviewed against management plan for alignment. If there is not adequate alignment or technical assistance is required outside of the provided resources, a revised budget may be requested.
4. A review of allowable expenses is made; Special focus on activities budgeted for in planning versus implementation activities as well as supplemental investment rather than supplanted investment.

RISK ASSESSMENT

Under all federal programs, it is required to assess subgrantees and their applications to identify potential fiscal and programmatic risks, which may result in increased reporting, monitoring, additional technical assistance, corrective action, and/or grant suspension or termination. This includes assessing the performance of ESP's, EMO's and CMOs as it related to subgrantees' successful operations.

Bluum will utilize the risk assessment to determine the depth and breadth of monitoring required for specific subgrantees including required technical assistance, monitoring and reporting elements as a condition of receiving the funds.

TECHNICAL ASSISTANCE PLAN

Following the Risk Assessment, a customized technical assistance plan will be determined for the qualified subgrantee. This Risk Assessment will be compared to the subgrantees self-assessment to ensure all parties are on the same page. It is possible all required technical assistance will not be covered through the CSP grant support. In this case, CSP funds may be reallocated to cover the expense.

AWARD NOTICE

Applicants and their authorizer will receive notification on the status of their application via email. If approved for funding, the subgrant award letter will stipulate all additional required information to be provided within 30 days of the award notice. Upon receipt of all requirements, the applicant will receive an email stating the subgrant has received final approval. Failure to provide requested information, may result in revocation of the award.

PERFORMANCE CONTRACT & INDIVIDUALIZED GRANT PLAN (IGP)

All subgrantees must maintain a performance contract with Bluum – separate from, but aligned with, an authorizer's performance certificate that will include the following:

- Data and reporting currently provided by the state accountability system under ESSA requirements to ensure progress is being made towards achievement goals, performance benchmarks, accreditation, and compliance reporting requirements.
- Subgrantees agree to participate in all required reporting associated with the performance certificate for the entire grant period PLUS one additional year to better track overall effectiveness of the **Building on Success** project.
- Documentation of final budget and timelines and criteria for release of funds.

DISSEMINATION

Technical assistance is provided to ensure all potential applicants receive adequate support to submit a high-quality proposal and perform against their stated goals and objectives. Additional technical assistance is provided to charter and traditional schools around the state in the form of best practice.

TIMELINES

Review of inputs shaping the technical assistance calendar take place no less than two times per year. Inputs include reviewer feedback, Risk Assessment forms, stakeholder feedback and information learned from other supporting initiatives within Bluum. Participants will have at least a 15-day-notice for all professional development opportunities.

AUDIENCE

Technical assistance will be provided for all public schools throughout the year. Participants who are not classified as subgrantees will be invited to sessions focused on best practice strategy identified within high-quality schools. At times, technical assistance may also be limited to only charter schools.

PROMOTION

All technical assistance will be promoted on the Bluum website. Further, Bluum will promote technical assistance through email marketing lists and social media. In general, all technical assistance workshops will be announced at least 15 days prior to the workshop. Efforts will be made to provide both virtual and in-person workshops across the state when feasible.

PRESENTER SELECTION

Presenters will be selected from a wide network of local and national experts, inclusive of Bluum staff and grant partners. Presenters will have experience and expertise in the topic of knowledge. When possible, educators successfully implementing best practice and seeing significant results will be engaged.

PROCESS FEEDBACK LOOP

INPUTS

The following are planned inputs into the feedback loop:

- A. *Interim Reporting.* Subgrantees will provide interim reports related to the performance against approved grant outcome goals. Within each report, subgrantees will provide challenges and opportunities to inform future technical assistance to be provided through the CSP grant.
- B. *Annual Data Analysis.* Redfish Metrics will provide annual data analysis and report on the effectiveness of the CSP grant, using academic and other data inputs associated with school quality. This analysis will be completed independently of Bluum to ensure adequacy and transparency in the reporting of impact.

- C. *Stakeholder Feedback.* Bluum will regularly collaborate with subgrantees to identify needs and best practice.

ROLE OF DATA COLLECTION

The inputs collected, most specifically the impact on student achievement, will be used to inform the development of technical assistance that is most aligned with the needs of the challenges faced by subgrantees. Academic performance will measure the validity of the rubric evaluation tool as a method of assessing and predicting quality. Additionally, inputs collected will serve as opportunities for sector wide dissemination of best practice strategy or technical assistance for shared obstacles towards academic achievement.

LEGISLATIVE REVIEW

Bluum will actively share grant objectives, regular progress towards those objectives and identified best practice with both the House and Senate Education Committees.

FINANCIAL TRANSPARENCY

TRACKING

All financial management activity for Bluum will be handled internally. Each subgrantee's expenditures, discretionary and non-discretionary, will be tracked separately using a class code.

DOCUMENTATION

All documentation will follow the financial policies adopted by Bluum. Supporting documentation, inclusive of check stubs, contracts, verification of deliverables, etc. will be submitted electronically monthly as part of the reimbursement process and also kept in a physical file for reference and audit purposes.

SEFA REPORTING

Within 30 days of the close of the subgrantee fiscal year, Bluum will provide a Schedule of Expenditures of Federal Awards (SEFA) to be reported in the subgrantee audit. Additionally, the proper allocation to be reported in Bluum's annual audit will be calculated.

PROCUREMENT

Bluum will follow the procurement practices as determined in the adopted financial policies. All policies are aligned to the Uniform Guidance Act.

SUBGRANTEE REIMBURSEMENT PROCESS

TIMELINES

The request window will open on the 1st of each month for expenditures through the prior month. All requests will be due no later than the 10th of each month and payment will be made electronically by the 21st of each month.

REQUIRED DOCUMENTATION

For reimbursement consideration, subgrantees must submit the following documentation as applicable to the request:

- A. *Payroll Records*. This must include timesheets, paystubs, and annual verification of role to ensure against supplanting.
- B. *Procurement Records*. This must include invoices with all required approvals per the adopted financial policies, proof of payment such as a check stub, credit card statement or ACH notification. If applicable, an executed contract must be provided.
- C. *Suspension and Debarment Documentation*. For all contracts greater than \$25,000, documentation against the suspension and debarment published list must be provided.
- D. *Certification Statement*. Subgrantees must submit a certification statement as to the accuracy of the documentation provided and the alignment with the grant budget and financial policies.
- E. *Requested Amount Verification*. All requests must confirm the total amount requested.
- F. *Supporting General Ledger Report*. All requests must be listed on a supporting general ledger report from the subgrantee's accounting management system. This ledger must align with the approved budget categories.

REVIEW PROCESS

The following steps will be taken as part of the review process:

- 1. The financial team will review all documentation for accuracy and completeness.
- 2. The financial team will review all requested reimbursements against the approved budget outlined in the Performance Contract.
- 3. If discrepancies are found, the financial team will contact the subgrantee with a request for further documentation within two weeks. The subgrantee must provide additional documentation within five days of receipt for reimbursement of the expense. The expense may be resubmitted the following month if documentation is not readily available. Expenses not submitted within 90 days of payment may be deemed ineligible for reimbursement.
- 4. Once the final reimbursement is approved, the subgrantee will be notified of the approval and the upcoming payment date.

TRACKING

All approved requests will be logged into the Bluum accounting management system and labeled appropriately for SEFA reporting.

FINANCIAL PROGRESS AND MONITORING

Bluum will ensure that each eligible applicant that receives a subgrant under Idaho's **Building on Success** grant will implement with fidelity the activities described in the subgrantee's application, and to ensure that they adhere to federal rules and regulations and accomplish their performance goals. This monitoring will occur minimally once per year. Final monitoring and reporting requirements will be determined initially upon completion of the Risk Assessment.

Requirements may be revised based on the results of any monitoring or reporting phase. Award amounts may be reduced if subgrantees do not adhere to the terms of their grant; this includes if projected enrollment is not met, technical assistance requirements are not completed each year, funds are not spent in a timely manner, and reporting not completed. In order for schools to exit the program in good standing, it is imperative that subgrantees comply with all requirements of the program.

PERFORMANCE REPORTING & MONITORING

The tools used for reviewing and assessing adherence to the terms of the grant include:

- A. *Interim Reporting.* As described in the Performance Contract, mid-year reporting will be required. This reporting will not be a comprehensive report but rather focused on an area of discovered risk. Of specific focus will be:
 1. Student Enrollment – Total enrollment and population demographics.
 2. Academic Progress – Growth and Proficiency.
 3. Financial audit – Organization's finances are in good order and federal dollars are being allocated appropriately.
 4. Good standing – School is in good standing with their state approved authorizer.
- B. *Final Grant Report.* A final grant report is due to Bluum within 90 days of the end of the final grant year. The final report should contain the following:
 - Executive Summary.
 - Report on each grant project goal, including a summary of the progress made on each goal and objective.
 - Report on the academic achievement and growth of the school, including a copy of the most recent school performance framework report.
 - Financial narrative report on how the grant was expended for each of the grant years and totals for the grant period.
 - Expenditure report that details 100 percent of awarded grant funds and includes a property inventory of all equipment and non-consumable goods purchased with CSP grant funds (EDGAR 80.32, 74.34)
- C. *Site Visit.* A site visit is conducted by grant program staff and outside experts as needed to review key indicators to identify progress toward grant objectives, spending according to budget, educational programming, enrollment procedures, receipt of other federal funds and complicate to various other requirements, including fulfillment of TA, review of certifications, and submission of the AFR. This comprehensive review looks at academic performance, learning environment, organizational effectiveness, governance, and quality leadership through a variety of lenses.

A preferred scheduled will be developed based on the anticipated RFA window open date.

FINANCIAL REPORTING & MONITORING

The tools used for reviewing and assessing financial compliance to the terms of the grant include:

- A. *Monthly Reimbursement Log.* Each month, subgrantees are required to submit a log of all expenditures to be reimbursed, inclusive of documentation supporting the expenditure, alignment to the approved budget and outcomes described in the management plan.
- B. *Audit Review.* As part of the subrecipient monitoring protocol, the following will occur no later than November 11th each year:
 - 1. Subgrantees must submit a Board approved final audit report.
 - 2. Subgrantees must submit a detailed general ledger report supporting audit.
 - 3. Bluum will review the audit against an audit checklist inclusive of reviewing the relevance and risk of all findings, proper reporting of SEFA allocations and other identified risk factors as applicable.
- C. *Desktop Review.* A desktop review is conducted minimally at the end of the first planning year to ensure that all executed contracts and waivers are on file, technical assistance is completed, grant award spending is timely, and CSP grant ledgers are accurate.
 - 1. A desktop review will be scheduled.
 - 2. The subgrantee will be provided a final written report on the results of the review.

GRANT REVOCATION PROCESS

To protect Federal dollars, failure to demonstrate progress towards benchmarks and targets may result in revocation of the grant, a reduction in funding and the return of misused or unspent funds. The process for revocation is as follows.

COMMUNICATION

- 1. Sub-recipient monitoring or reporting protocol will flag non-compliance or failure to meet expected benchmarks and targets.
- 2. An official notification of high-risk status will be issued to the subgrantee and the subgrantee's authorizer within 30 days of any required monitoring or reporting. Included in the notification will be details of the corrective action to be taken, timelines for correction and consequences of failing to take corrective actions.

CORRECTIVE ACTION

Upon satisfaction of the corrective action, an official notice will be issued to the subgrantee, the subgrantee's authorizer and the Idaho State Department of Education within 30 days of the provided evidence.

GRANT CLOSE-OUT

If the subgrantee does not meet the timelines and requirements for corrective action, an immediate revocation of funding will take place, effective back to the date of the identified action. Final reimbursement will be issued for all allowable expenditures and the grant will be closed out.

COMMUNICATIONS

GRANT MANAGEMENT SYSTEM

Beginning with the application process, subgrantees will have access to all official communications as part of the grant management system. Upon request, physical copy of all provided electronic communication will also be mailed to the subgrantee.

MAILING LIST MANAGEMENT

All subgrantees are required to join Bluum's **Building on Success** mailing list. Multiple people from each school are encouraged to be on the list. This list will be used for all communications and activity will be monitored.

1. Open rates for each communication will be monitored with each distribution.
2. Invalid emails will be removed from the list. If a primary contact of a subgrantee, the individual will be notified of the error via a phone call and corrected.

USDOE REPORTING

PROGRAMMATIC REPORTING

Programmatic reporting against GPRA measures is required annually. Bluum and partners will actively collect and review the data supporting performance against the identified goals throughout the grant year to ensure adequate progress is being made.

FINANCIAL REPORTING

Monthly, Bluum will submit detailed financial reporting and supporting documentation for all reimbursed expenditures. This process will include documentation of the approved budget area of funding and the alignment to the identified output. All financial reporting will be stored both electronically and physically.

DOCUMENTATION

PROCESS

All documentation will be issued both electronically via email and the grants management system and be available physically through the postal service.

STORAGE

All documentation will be stored electronically in the grants management system or SharePoint and physically in a locked storage cabinet to be maintained by the Finance department.

CONTACT INFORMATION

PROGRAM QUESTIONS CONTACT:

Terry Ryan, CEO | grantsCSP@bluum.org

FISCAL/BUDGET QUESTIONS CONTACT

Primary: Marc Carignan, Chief Financial Officer | financeCSP@bluum.org

Secondary: Cole Skinner, Grant Financial Officer | financeCSP@bluum.org

RFA SPECIFIC QUESTIONS CONTACT:

Amy Hukkinen, Director of Federal Grants & Support | grantsCSP@bluum.org