



Board Policy Manual

2022-23



Table of Contents

2

Board Policy Manual Table of Contents

Section I – Overview

- A. Responsibilities of Board of Directors
- C. Responsibilities of Individual Board Members (“Directors”)
- D. Code of Ethics

Section II – The School

- A. Mission, Vision, and Our Approach
 - Mission
 - Vision
 - Our Approach
- B. School Legal Status
- C. Non-Discrimination Policy
- D. Organizational Chart

Section III – The Board

- A. Bylaws
- B. Board Member Qualifications
- C. Policy Making
- D. Board Review of Administrative Procedures
- E. Summary of Georgia Open Meeting Law
- F. Board Attendance Policy
- G. Board Fundraising Policy
- H. Board Self-Evaluation
- I. Annual Training
- J. Indemnification Policy
- K. Chief Executive Policy
- L. Annual Head of School Performance Evaluation
- M. Leadership Sustainability Policy
- N. Emergency Leadership Transition Plan
- O. Compensation Policy
- P. Risk Management Policy
- Q. Conflict of Interest Policy
- R. Confidentiality Policy
- S. Grievance Policies
- T. Whistleblower Policy
- U. Open Record & Records Retention Policy
- V. Media Policy
- W. Social Media Policy



Section IV - Accounting

- A. GAAP
- B. Accounting Basis
- C. Restricted Grant Tracking
- D. Cost Center Accounting
- E. Capitalization and Depreciation
- F. Bank Reconciliations
- G. Financial Record Retention and Destruction

Section V - Banking

- A. Checking Account
- B. Savings Account
- C. Line of Credit
- D. Federal Deposit Insurance
- E. Petty Cash Fund
- F. Deposits of Receipts

Section VI - Purchases

- A. Authorization of Expenditures
- B. Contracts and Bidding
- C. Purchasing
- D. Invoice Processing and Requests for Payment
- E. Payment Approvals and Payroll Processing
- F. Debit Card Usage
- G. Credit Card Usage
- H. Sales Tax Exemption
- I. Electronic Payments
- J. Non-Travel Related Employee Reimbursements
- K. Travel-Related Employee Reimbursements
- L. Employee Mileage Reimbursements
- M. Personal Use of School Funds

Section VII - Payroll

- A. New Employees
- B. Timekeeping for Hourly Employees & Payroll Changes
- C. Payroll Processing and Accounting
- D. Independent Contractor vs. Employee



Section VIII - Property and Equipment Policies

- A. Responsibilities
- B. Capitalization Policy
- C. Inventory Policy
- D. Depreciation Policy
- E. Disposal of Property and Equipment Policy

Section IX. Audits & Tax Filings

- A. Annual Audit
- B. Form 990 Federal Tax Return

Section X - Donations & Philanthropy

- A. Tax Exempt Status & Charitable Solicitation
- B. Donations
- C. Donated Stock and Securities
- D. In-Kind Donations

Section XI - Financial Reporting & Planning

- A. Budget Approval
- B. Monthly Financial Statements
- C. Quarterly Financial Reports

Section XII - Other Practices & Financial Matters

- A. Conflicts of Interest
- B. Related Party Transactions
- C. Debt
- D. Political Contributions & Advocacy
- E. Approvals and Authorizations

Section XIII - Federal Grant Compliance

- A. EDGAR Compliance
- B. Federal Cash Management Procedures
- C. Federal Cost Allowability Procedures
- D. Conflicts of Interest in Federal Procurement



Section I – Overview

A. Responsibilities of Board of Directors

The Anchor School Board of Directors will ensure we achieve our mission for our school through strategic planning and progress monitoring, alignment of assets to priorities, protecting financial assets, ensuring legal and ethical integrity, selecting and evaluating the Head of School, and advocating for the School's mission and goals to garner support from community. As a Board of 5-15 members, the Board will utilize a subcommittee structure that will report to the full Board monthly to ensure these duties.

The Anchor School Board Policy Manual contains the policies used to effectively govern the organization for the purpose of creating a high-quality public charter school for the students and families of Georgia.

B. Responsibilities of the Board

- Support and advocate for the mission and vision of the school. Evaluate and review the stated mission and purpose that articulates the organization's goals, means, and primary constituents served.
- Select, support, and evaluate the Head of School. Ensure the chief executive is qualified for the position, and ensure chief executive has the moral and professional support necessary to further the stated mission and goals of the school.
- Ensure effective planning. Actively participate in the overall planning process and assist in implementing and monitoring the plan's goals. Monitor and strengthen programs and services. Determine alignment of programming with the mission of the school and monitor their effectiveness.
- Ensure adequate financial resources. Secure adequate resources for the organization to fulfill its mission.
- Protect assets and provide proper financial oversight. Assist in developing the annual budget and ensure proper financial controls are in place.
- Build a competent Board. Define prerequisites for candidates, orient new members, and annually evaluate the Board's performance.
- Ensure legal and ethical integrity. Ensure adherence of the school to legal standards and the highest ethical standards.
- Enhance the school's public standing. Clearly articulate the school's mission, accomplishments, and goals to the public and garner support from the community.

C. Responsibilities of Individual Board Members ("Directors")

- Support and advocate for mission and vision of the school.
- Commit 5-10 hours per month (includes meetings, phone calls, and emails).
- Attend monthly Board meetings and actively serve on at least one committee.
- Make a meaningful annual financial contribution.
- Support decisions made by the Board as a whole.
- Cultivate community support for the school.



D. Code of Ethics

All Board members of the school must:

- Uphold and abide by all local, state, and federal laws, court orders, rules and regulations issued by the Georgia Department of Education and any other relevant authority pertaining to schools.
- Effectuate desired changes only through lawful and ethical processes.
- Make decisions grounded on the educational welfare and wellbeing of the children served by the school without consideration to race, religion, color, sex, income level, or any other protected category.
- Use their independent judgment in reaching all decisions.
- Not use their position as Director for personal gain or profit.
- Conduct themselves in a manner that reflects positively on the school.
- Make all reasonable efforts to support the school's mission and personnel.

Section II – The School

A. Mission, Vision, and Anchors

Mission

The Anchor School (TAS) is a village of educators, families, and community members that partners with 6th through 12th grade students who are developing the knowledge, skills, and confidence they need to thrive in school and beyond. Through our commitment to excellent instruction, community partnerships, and holistic student development, we cultivate anchors that build a more just and equitable future.

Vision

We are committed to cultivating experiences that allow young people to connect with who they are, to whom they are connected, and the world they inhabit. Our educational approach supports intellectual, physical, social, and emotional growth. Our students will become anchored internally and externally. Our graduates have the confidence, skills, and knowledge they need to thrive at TAS and in life beyond TAS.

Anchors

When we say we “cultivate anchors” in our mission, we are describing the impact the school model has on students and the community. Anchors offer stability and confidence in turbulent waters, and are necessary in the transition from adolescence to early adulthood. In addition to offering young people the stability and confidence needed to thrive beyond school, TAS serves as an anchor institution in the larger community by offering a myriad of educational programs; youth programs; community health services; employment opportunities; a hub for the development of culture, learning, and innovation; a long-term presence; and support for local businesses.



Anchoring Beliefs

1. Every student deserves access to an excellent education.
2. Learning communities must be diverse, inclusive and equitable environments where every perspective is valued.
3. Evidenced based data-driven instructional practices are essential.
4. Excellence requires constant preparation and reflection.
5. Human development happens in community, in context, and in conversation.
6. Confidence is built through mastery experiences, positive relationships, healthy self-image, and strong role models.

B. School Legal Status

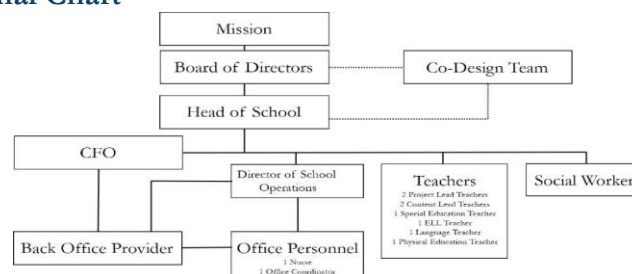
The Anchor School is undergoing the application process to become a State Charter School Commission charter school. The school will operate pursuant to the charter that will be granted by the State Charter School Commission ("SCSC"), a Legal Educational Authority of the State of Georgia.

C. Non-Discrimination Policy

The officers, directors, committee members, employees, and persons served by this corporation shall be selected entirely on a nondiscriminatory basis with respect to age, sex, race, religion, national origin, and sexual orientation. It is the policy of the school not to discriminate on the basis of race, creed, ancestry, marital status, gender, sexual orientation, age, physical ability, veteran's status, political service or affiliation, color, religion, or national origin in admissions, hiring, selection or appointment to any office. See list of applicable laws in footnote.¹

The Anchor School shall maintain its educational programs in compliance with all laws relating to non-discrimination. Procedures shall be established and personnel appointed within the District to deal with student and parent concerns relative to the requirement of non-discrimination. The nondiscrimination policy shall apply to all acts related to school activity or school attendance.

D. Organizational Chart



¹ O.C.G.A. 34-6A-2 Equal Employment for persons with disabilities-Definitions O.C.G.A. 34-6A-3 Inquiries by employer as to existence of disability; employment decisions based on disability.

O.C.G.A. 34-6A-4 Prohibited discriminatory activities O.C.G.A. 34-6A-5 Retaliation by employers against employees; labor organization members O.C.G.A. 34-6A-6 Actions against persons engaged in unfair employment practices; remedies, court costs, and attorney's fees O.C.G.A. 45-19-29 Fair Employment Practices Act of 1978- Unlawful practices generally O.C.G.A. 45-19-31 Unlawful practices in advertisement of employment O.C.G.A. 45-1-4 Whistleblower O.C.G.A. 20-2-211.1 Clearance certificates issued by the Professional Standards Commission relating to fingerprint and criminal background checks O.C.G.A. 20-2-211 Annual contract; disqualifying acts; fingerprinting; criminal record checks O.C.G.A. 30-1-1 "Deaf person" defined O.C.G.A. 34-1-2 Age discrimination in employment prohibited O.C.G.A. 34-5-1 Discriminatory wage practices based on sex; (comp worth) 34 CFR 104.7 Section 504 - Designation of responsible employee and adoption of grievance procedures 34 CFR 100.7(c) Title VI - Conduct of investigations 29 CFR 1691.5 Agency processing of complaints of employment discrimination - ADA 34 CFR 106.8 Title IX - Designation of responsible employee and adoption of grievance procedures for sex discrimination 42 USC 2000d 1964 Civil Rights Act 20 USC 1703 Denial of equal educational opportunity prohibited 29 USC 631 Age limits 29 USC 623 Age Discrimination Act of 1967 42 USC 12101 Americans with Disabilities Act of 1990 29 USC 705 Rehabilitation Act of 1972 20 USC 1681 Title IX of the Education Amendments of 1972



Section III – The Board

A. Bylaws

The board shall comply with the bylaws of the organization in their governance of The Anchor School. The board is responsible for reviewing, amending, and approving the bylaws annually. Bylaws will be shared with every board member during orientation and then, again, after the annual review, amendment, and approval process.

B. Board Member Qualifications

Members of TAS Board of Directors must be citizens of the United States and residents of the State of Georgia. Members of TAS Board of Directors may not be employees of The Anchor School. All members of the TAS Board of Directors will be required to submit to and satisfactorily pass a criminal background check prior to beginning service on the Board.

C. Policy Making

1. The board shall be solely responsible for adopting, repealing, or amending policies for the school. Action by the board shall be accomplished as set forth in the bylaws.
2. Except in cases of special need, the board shall follow the following procedure in adopting, repealing, or amending policies at The Anchor School:
 - a) Committee Review. The proposed policy shall be submitted to the appropriate committee for review and discussion. When the committee has a final draft of the policy, it will be submitted to the full Board for review.
 - b) Full Board Review. The proposed policy shall be contained in the board packet distributed prior to the full board meeting. The policy will be presented at a full meeting of the board. The board will review and discuss any necessary changes on the policy. When discussion of the policy is concluded, the board will decide whether to move the policy to a full board vote. The board will vote on whether to approve the policy. If the policy receives a simple majority vote, the proposed policy will be adopted and shall become a policy of The Anchor School. If the policy does not receive a majority vote, it will go back to committee for revision and resubmission to the full board.
 - c) Special Needs. Upon a two-thirds (2/3) vote of the directors present at a regular or special meeting called for that purpose, a special need may be declared. If a special need is declared, a policy may be adopted on first reading.
 - d) Documentation. A proposed policy should reference the policy provision it will be amending. Ideally, the entire policy will be shared with new and deleted language displayed in redline.

D. Board Review of Administrative Procedures

The board recognizes its role of ensuring the fiscal and organizational health of the school through oversight and continuous progress monitoring. The head of school shall be responsible for the day-to-day administration of affairs of The Anchor School and shall manage all activities of the school as prescribed by the board. As a result, the board need not review administrative policies and regulations in advance of issuance except as required by law. However, the board should approve in advance any highly sensitive matters of policy and/or regulations that have the potential to impact its duties and obligations to The Anchor School and/or Georgia Department of Education. To that end, the head of school shall exercise his or her discretion to identify and bring to the board's attention any such policies and regulations prior to issuance. Administrative policies and regulations should reference existing board policy when applicable. The board reserves the right to review administrative policies and regulations at its discretion. However, the board shall revise or veto such regulations only when, in its judgment, such regulations are inconsistent with the board's policies.



E. Summary of Georgia Open Meeting Law

The Georgia Open Meetings Act covers the meetings of "the governing body of an agency" and committees created by its members. The general rule is that all meetings of governing bodies of agencies must be open to the public. The term "agency" includes the following:

- Every state department, agency, board, bureau, commission, public corporation, and authority;
- Every county, municipal corporation, school district and other political subdivision;
- Every department, agency, board, bureau, commission, authority and similar body of each county, municipal corporation or other political subdivision of the state;
- Every city, county, regional or other authority established pursuant to state law; and;
- Non-profit organizations that receive more than one-third of their funds from a direct allocation of state funds from the governing authority of an agency.

A governing body may exclude the public from a portion of a meeting known as a "closed session" if it identifies a specific statutory exemption.

Under Georgia Open Meetings Act, a governing body may hold a closed session when it is dealing with one of nine subject-area exemptions found in Ga. Code § 50-14-3. The applicable exemptions per the current GA Code are (subject to change):

- staff meetings held for investigative purposes under duties or responsibilities imposed by law;
- meetings when any agency is discussing the future acquisition of real estate;
- meetings when discussing or deliberating upon the appointment, employment, compensation, hiring, disciplinary action or dismissal, or periodic evaluation or rating of a public officer or employee;
- meetings of the board of trustees or the investment committee of any public retirement system when such Board or committee is discussing matters pertaining to investment securities trading or investment portfolio positions and composition; and
- meetings when discussing any records that are exempt from public inspection or disclosure pursuant to paragraph (15) of subsection (a) of Code Section 50-18-72, when discussing any information a record of which would be exempt from public inspection or disclosure under said paragraph, or when reviewing or discussing any security plan under consideration pursuant to paragraph (10) of subsection (a) of Code Section 15-16-10.

To ensure compliance with Open Meeting Law, The Anchor School will:

- Post the annual schedule of meetings on the school website and in a highly visible location in the front office and other areas frequented by our school community.
- Any changes to the schedule would be published in the same locations at least two weeks in advance, as well as advertised on the school's social media profiles.
- All meeting locations will be announced in advance and held in publicly accessible locations.
- Meeting agendas will be available at least one week in advance on the school's website.
- The board will provide clear signage, seating, and agendas for any members of the community that want to attend the meeting.
- 16 minutes will be provided for open comment at the beginning of each meeting (2 minutes per speaker, in the order that they have signed into the meeting attendance sheet).
- Meeting minutes will be posted on our website upon approval (from the previous month's meeting).



- In the event of an executive session (due to personnel matters, negotiations including real estate, or threatened or potential litigation), the board will motion in the open meeting to go into executive session and state the general reason, which will be reflected in the minutes. Meeting minutes will be recorded for Executive Sessions but will not be made public.
- Committee meetings will be held to the same open meetings standards as general board meetings for location accessibility, notice, and meeting minutes.
- Special meetings held outside of regularly scheduled board meetings will be announced at least 24 hours in advance through the county's legal notice publications, school website, and school social media.

F. Board Attendance Policy

Because board meetings are the only forum during which the board can discuss and vote on major school policies and decisions, attendance at these meetings carries a special importance.

Definitions.

"Notified" Absence: For absence to be "notified," a director must notify the person running the meeting (usually Chair or Vice-Chair) by 12:00pm the day of the meeting that s/he will be absent.

"Unnotified" Absence: For absence to be "un-notified," a director failed to notify the person running the meeting (usually Chair or Vice-Chair) by 12:00pm of the meeting day that s/he will be absent.

Unsatisfactory Attendance: If any of the following conditions exist, an individual Director will be considered to have unsatisfactory attendance:

- (1) the Director has two *"un-notified"* absences in a row;
- (2) the Director has three *"notified"* absences in a row;
- (3) the Director misses one third of the total number of Board meetings during one of their term years.

Process for Responding to Unsatisfactory Attendance.

The Board Secretary will keep track of director attendance through board meeting minutes and will provide this information to the Chair. The Chair will directly contact a director at risk of potentially violating the policy to discuss the problem as well as issue both verbal and written warning. If a director does violate the policy, the Chair will bring this to the board's attention for discussion, after which point a majority vote will be held to determine possible termination from the board.

G. Board Fundraising Policy

The board of directors is a 100% giving board. Board members are expected to give an annual monetary gift to TAS and are asked to make TAS a priority in their personal giving. All financial contributions to TAS by board members are confidential (known only to the leader of the Fundraising Committee), and no minimum contribution is required. Directors are expected to be involved in fundraising by using their personal and business connections when appropriate, by soliciting funds when appropriate, by serving on fundraising committees, and by attending fundraising events.

H. Board Self-Evaluation

Effective performance of the board itself can have a significant impact on the overall success of the school. Therefore, the board will conduct an annual assessment of its own work. The Board Chair



will conduct an annual assessment/evaluation of the board and individual directors, including each director's self-assessment, and board meetings/sessions, and report a summary to the Governance Committee and full board but it must include a formal written survey/self-assessment tool. The evaluation process should be designed to encourage constructive feedback aimed at improvement.

I. Annual Training

The governing board shall receive initial training and annual training thereafter. Pursuant to O.C.G.A §20-2-2072 and relevant state board rules, the training shall include, but not be limited to, best practices on school governance, the constitutional and statutory requirements relating to public records and meetings, and the requirements of applicable statutes and rules and regulations. The school may require evidence of participation or certificates of completion to demonstrate the requirement has been satisfied.

Within 60 days, new members to the board of directors shall participate in a formal training session provided by an agency qualified to provide training specific to charter schools and non-profit governance. At a minimum, this training shall include:

- Fiduciary Responsibilities of Boards
- Roles and Responsibilities
- Board Accountability
- Conflict of Interest
- Open Meetings and Open Records
- Best Practices in Charter School Governance

Additionally, at least two board members must be trained and credentialed in the Leader Keys Effectiveness System ("LKES").

J. Indemnification Policy

TAS will purchase and maintain directors' and officers' liability insurance (often called D&O), liability insurance payable to the directors and officers of a corporation, or to the organization(s) itself, as indemnification (reimbursement) for losses or advancement of defense costs in the event an insured suffers such a loss as a result of a legal action brought for alleged wrongful acts in their capacity as directors and officers.

The corporation will not provide indemnification for items arising from the individual's participation in an excess benefit or self-dealing transaction. Indemnification may also be denied in a proceeding brought by or on behalf of the corporation (except for expenses), if it is determined that the indemnitee did not meet the standard of conduct required.

This indemnification includes expenses (including attorneys' fees), judgments, fines, and amounts paid in settlement actually and reasonably incurred by him/her in connection with such action, suit, or proceeding if s/he acted in good faith and in a matter s/he reasonably believed to be in or not opposed to the best interests of the corporation. With respect to any criminal action or proceeding, s/he must also have had no reasonable cause to believe his/her conduct was unlawful.

K. Chief Executive Policy

The board shall rely on its Chair and the Chief Executive reporting to the board (e.g. Head of School/School Leader) to provide professional and administrative leadership. The Chief Executive shall be hired by and report directly to the Board of Directors.

The Chief Executive will be responsible for the day-to-day administration of the school's affairs and



will manage and direct all activities of the organization as prescribed by the board. The Chief Executive will have the power to hire and discharge employees of the school and will oversee and direct their activities in carrying out the work of the school. The Chief Executive is the board's only link to operational achievement and conduct, so that all authority and accountability of staff, as far as the board is concerned, is considered the authority and accountability of the Chief Executive. The Chief Executive will, directly or indirectly, supervise all other staff members employed by the school and is responsible for selecting staff members, conducting staff evaluations, and recommending compensation levels.

Accordingly:

1. The board will generally refrain from giving instructions to persons who report directly or indirectly to the Chief Executive.
 1. The board will generally refrain from evaluating any staff other than the Chief Executive.
 2. The board will view Chief Executive performance as identical to organizational performance, so that organizational accomplishment of ends, policies, and organizational operations (within the boundaries established in board policies on executive limitations) will be viewed as successful Chief Executive performance.

L. Annual Head of School Performance Evaluation

Charter schools receive autonomy over fiscal management and the academic program in exchange for accountability, which measures the school's attainment of specific mission-oriented academic, operational, and governance goals. The board of directors' key responsibility is to manage the school through the performance of the Chief Executive. There are three core purposes of the evaluation: to recognize areas of strength and success, to identify areas for improvement and/or focus, articulate areas for improvement and/or focus, and to inform the board's request for a plan of action from the school leader that addresses how the goals in the charter will be met. Annually, the Governance Committee will conduct the evaluation in accordance with its Chief Executive Evaluation Protocol (which provides guidelines for: how to gather information to inform the evaluation; a timeline for evaluation activities that aligns with the school year; and what to include in the written evaluation document) and the Leader Keys Effectiveness System ("LKES").

M. Leadership Sustainability Policy

TAS will have a sustainability policy that:

1. Ensures ongoing and continuous development of leadership capacity at the Head of School and board levels.
2. Responds in a timely and effective manner to an emergency leadership transition.
3. Responds in a timely and effective manner to a planned leadership transition.

N. Emergency Leadership Transition Plan

The following outlines the school's plan in the case an emergency transition of the Head of School is necessary. The Head of School may be immediately dismissed in cases of unethical or illegal behavior, gross misconduct, mishandling of funds, or continued underperformance of responsibilities.

- *Communication:* In the case of the Head of School needing an emergency transition out of his role, the Board Chair will become the first point of contact, notifying all directors of the transition, and leading discussion about next steps. The Board Chair will send subsequent communication containing the circumstances and recommend a plan of action to the full



board for approval and to the school staff for information. Once the full board has approved a plan of action, the Board Chair will send a message to the organization's key stakeholders, e.g., the authorizer, funders, parents, and Building Excellent Schools detailing the plan. The board will ensure ongoing access to key stakeholder contact lists and to critical passwords, such as those used for social media accounts.

- *Financial Oversight:* To enable business to continue in the case of an emergency Head of School transition, the board will ensure that the Director of Operations, Chair, and Treasurer are signatories on the school's checking accounts. For ease of access, the board will ensure the ability to make transactions electronically on all accounts. The board will also ensure ongoing access to current contact details for all financial advisors, accountants and back-office providers, and key funders. Finally, the board will ensure that a schedule of key activities and deadlines, such as the IRS Form 990 is current and accessible.
- *Interim Management:* In the case of an emergency transition, the board will designate a Director-Level or Principal-Level staff member as acting Head of School. The acting Head of School has limited executive power. He or she will be appointed by the board to provide leadership during the planning and/or implementation phases of the executive search.
- *Executive Search:* The board will immediately convene an ad hoc committee composed of the Chair and two other directors, and chaired by the Chair.

O. Compensation Policy

Board members shall serve without compensation. Board members shall be allowed reasonable reimbursement of expenses incurred in the performance of their duties, including attendance at board-authorized conferences or meetings for the purposes of board professional development. Reimbursements for expenses while traveling for board related duties or functions shall be reimbursed according to the travel policy of The Anchor School.

P. Risk Management Policy

The Anchor School is committed to protecting its human, financial, and goodwill assets and resources through the practice of effective risk management. TAS board and management are dedicated to safeguarding the safety and dignity of its paid and volunteer staff, its clients, and anyone who has contact with the organization. To this end, the board will ensure that the organization has a risk management plan for the organization that is reviewed and updated on an annual basis.

Q. Conflict of Interest Policy

The Anchor School Board of Directors shall adhere to these Conflict of Interest Provisions.

Financial Governance

1. No board member shall use or attempt to use his or her official position to secure unwarranted privileges, advantages, employment for himself or herself, any of his or her immediate family members, or others.



2. No board member shall act in his or her official capacity in any matter in which he or she, any of his or her immediate family members, or any business organization in which he or she has a material financial interest, that would reasonably be expected to impair his or her objectivity or independence of judgment.
3. No board member shall solicit or accept or knowingly allow any of his or her immediate family members or any business organization in which he or she has an interest to solicit or accept any gift, favor, loan, political contribution, service, promise of future employment, or other thing of value based upon an understanding that the gift, favor, loan, contribution, service, promise, or other thing of value was given or offered for the purpose of influencing that board member in the discharge of his or her official duties. For purposes of this paragraph, a gift, favor, loan, contribution, service, promise, or other thing of value shall not include the items contained in subparagraphs (a)(2)(A) through (a)(2)(J) of Georgia Code Section 16-10-2.
4. No board member shall use, or knowingly allow to be used, his or her official position or any information not generally available to the members of the public which he or she receives or acquires in the course of and by reason of his or her official position for the purpose of securing financial gain for himself or herself, any of his or her immediate family members, or any business organization with which he or she is associated.
5. No board member or any of his or her immediate family members or any business organization in which he or she has an interest shall represent any person or party other than the charter school governing board in connection with any cause, proceeding, application, or other matter pending before the charter school governing board on which he or she serves.
6. No board member shall be prohibited from making an inquiry for information on behalf of a community member if no fee, reward, or other thing of value is promised to, given to, or accepted by the board member or any of his or her immediate family members in return therefor.
7. No board member shall be deemed in conflict with these provisions if, by reason of his or her participation in any matter required to be voted upon by the charter school governing board, no material or monetary gain accrues to him or her as a member of any profession, occupation, or group to any greater extent than any gain could reasonably be expected to accrue to any other member of that profession, occupation, or group.
8. No board member may also be an officer of any organization that sells goods or services to that charter school unless the organization providing goods or services is a Nonprofit membership organization or there are fewer than three sources for such supplies or equipment within the county; provided, however, that any purchase of goods or services that is equal to or greater than \$10,000 shall be approved by a majority of the members of the board in an open public meeting.



9. No board member shall be deemed in conflict with these provisions if, by reason of his or her participation in any matter required to be voted upon by the charter school governing board, no material or monetary gain accrues to him or her as a member of any profession, occupation, or group to any greater extent than any gain could reasonably be expected to accrue to any other member of that profession, occupation, or group
10. No charter school governing board may do business with a bank or financial institution where a board member is an employee, stockholder, director or officer when such member owns 30% or more stock in that institution.
11. No board member may have a financial interest in school buses, bus equipment or supplies, provide services for buses owned by the board, or sell gasoline to the board from a corporation in which the board member is a shareholder.
12. No board member shall accept a monetary fee or honorarium in excess of \$101.00 for a speaking engagement, participation in a seminar, discussion panel, or other activity which directly relates to the official duties of that public officer or the office of that public officer. Actual and reasonable expenses for food, beverages, travel, lodging, and registration for a meeting which are provided to permit participation in a panel or speaking engagement at the meeting shall not be monetary fees or honoraria.

Conduct As Board Member

1. No board member shall disclose or discuss any information which is subject to attorney-client privilege belonging to the charter school governing board to or with any person other than other board members, the board attorney, the school leader, or persons designated by the school leader for such purposes unless such privilege has been waived by a majority vote of the whole board.
2. No board member shall vote on the employment or promotion of any of his or her immediate family members. No immediate family member of a board member may be employed or promoted unless a public, recorded vote is taken separately from all other personnel matters.
3. No board member may be employed in any position in the charter school in which they serve.
4. No board member shall be employed by the State Department of Education or serve concurrently as a member of the State Board of Education.



5. No member a charter school governing board shall serve simultaneously on the governing body of a public local school district or of a private elementary or secondary educational institution that actively seeks funding from any government entity or private entity from which the charter school seeks funding.

Each member of this board understands and acknowledges that no person shall be eligible to serve on a charter school governing board unless he or she:

- (1) Has read and understands the code of ethics and the conflict of interest provisions applicable to members of charter school governing boards and has agreed to abide by them; and
- (2) Has agreed to annually disclose compliance with the State Board of Education's policy on training for members of charter school governing boards, the code of ethics of charter school governing boards, and the conflict of interest provisions applicable to members of charter school governing boards.

R. Confidentiality Policy

It is the policy of The Anchor School that directors and employees may not disclose, divulge, or make accessible confidential information belonging to, or obtained through their affiliation with TAS to any person, including relatives, friends and business and professional associates, other than to persons who have a legitimate need for such information and to whom TAS has authorized disclosure.

Directors and employees shall use confidential information solely for the purpose of performing services as a director or employee for The Anchor School. This policy is not intended to prevent disclosure where disclosure is required by law.

Directors must always exercise good judgment and care to avoid unauthorized or improper disclosures of confidential information. Conversations in public places, such as restaurants, elevators, and airplanes, should be limited to matters that do not pertain to information of a sensitive or confidential nature. In addition, directors and employees should be sensitive to the risk of inadvertent disclosure and should for example, refrain from leaving confidential information on desks or otherwise in plain view and refrain from the use of speaker phones to discuss confidential information if the conversation could be heard by unauthorized persons.

At the end of a director's term in office or upon termination of an employee's employment, he or she shall return, at the request of The Anchor School all documents, papers, and other materials, regardless of medium, which may contain or be derived from confidential information, in his or her possession.

S. Grievance Policies

Student or Family Grievance Procedure

Purpose

This policy outlines how the Board of Directors will handle general grievances from The Anchor School stakeholders.



Policy

Any grievance at the school will fall into one of three primary categories:

1. Complaints about a student, the classroom experience, or a teacher.
2. Complaints or concerns about a school-wide policy or administration.
3. Complaints or concerns about a parent/guardian or community member involved with the school.

Where a grievance involves an issue arising in the classroom, parents/guardians should first seek to resolve the issue with the classroom teacher.

If resolution with the teacher is not feasible or the grievance involves a school-wide policy or another parent/guardian at the school, the parent/guardian pursuing the grievance should seek to resolve the issue with the Principal. The grievance should be acknowledged via written response within 10 business days, or as soon thereafter as is reasonably practicable.

If resolution with the Principal is not feasible or efforts to resolve the issue have been exhausted, then the parent/guardian should bring the grievance to the attention of the Head of School. The grievance should be acknowledged via written response within 10 business days. For Category 1, the Head of School shall make the final determination.

For Categories 2 and 3 above, once all efforts to resolve a grievance have been exhausted with the school's staff and leadership, then a parent/guardian may bring a grievance to the attention of the Governing Board as follows:

- Any grievances should be made in writing. This allows all parties involved to work from a consistent body of information.
 - Generally, the Board will not address a grievance that is made anonymously, based on hearsay, or made on behalf of another family.
 - Generally, the Board will not address a grievance where resolution has not been exhausted through the appropriate steps listed above.
 - The School may, at its discretion, notify individual school employees about grievances brought against them. Parents/guardians may, however, request that they not be personally identified as the party bringing the grievance.
- 4) For any grievance presented to the Board, a response via written letter will be sent within (30) thirty days of receipt of the grievance, or as soon thereafter as is reasonably practicable. The Board may delegate the review of a grievance to a member or members of the Board, legal counsel, or another designee at its discretion.

Employee Grievance Procedure

SECTION 1. Employee Grievances

- a. As is natural, there are times when disputes arise between employees or between an employee and the school administration. Consistent with the philosophy behind The Anchor School Charter, it is expected that during any dispute, all employees will model the conflict resolution skills that they advance to their students. Should it become necessary, this procedure is intended to provide a simple, expeditious, and fair process for resolving employee complaints at the lowest possible level and with a minimum of conflict and formal proceedings.
- b. No employee will be subject to reprisal as a result of filing a complaint under this procedure.



SECTION 2. Scope of Complaint Procedure

Any current employee may file a complaint concerning his or her employment or the implementation of personnel policies. The complaint should be in writing, and every attempt should have been made to settle the issue with individual conversations before bringing a formal grievance.

Exclusions

This procedure may not be used to complain about the following:

- a. Performance ratings contained in the employee's personnel evaluations
- b. The employee's job performance
- c. Termination, non-renewal, demotion, suspension, or reprimand of employee
- d. Revocation, suspension, or denial of certificates to all certified employees
- e. Alleged misconduct, as that term is defined in the Reporting Misconduct Policy, unless the employee has already followed the reporting procedures therein and remains dissatisfied.

SECTION 3. Employee Grievance Procedure

1. Step One: Informal Discussion. An employee having a grievance hereunder shall make a good-faith effort to resolve the matter through informal discussions with the individual(s) involved in the matter and/or with the employee's direct supervisor, within five (5) working days of the occurrence or cause of such matter.
2. Step Two: Administrative Review. If the matter cannot be resolved through informal discussion, the aggrieved employee may submit their complaint, in writing, to the Principal within ten (10) working days after the most recent event upon which the complaint is based. The written complaint should include identification of the problem, a description of the efforts undertaken to informally resolve the dispute, and a proposed resolution. The Principal will make every reasonable effort to schedule a meeting to occur within five (5) working days of receipt of the complaint with the Principal and any other person(s) whose actions or decisions give rise to the matter. At such meeting, each party will have the opportunity to be heard and to request relief. Within three (3) working days or as soon thereafter as is reasonably practicable, the Principal will issue a written recommendation as to how the matter should be resolved. All parties present at the meeting shall receive copies of the written recommendation.
3. Step Three: Review by Head of School. If the aggrieved employee remains dissatisfied after administrative review, the employee may, within ten (10) working days of receipt of the Principal's written recommendation, submit the complaint to the Head of School. The Head of School will meet with the employee to go over the complaint and discuss the matter with all parties involved. This meeting shall take place within ten (10) working days of the Head of School's receipt of the complaint, or as soon thereafter as is reasonably practicable given the circumstances. The Head of School shall make every reasonable effort to prepare a written decision within five (5) working days of the meeting with the employee. All parties present at the meeting shall receive copies of the written decision.
4. Step Four: Review by the Board or a Committee Thereof. If the aggrieved employee remains dissatisfied after review by the Executive Director, the employee may appeal the Head of School's decision by filing within ten (10) working days of the decision, with the Board Chair,



the original complaint, and a written explanation of why he or she disagrees with the decision of the Head of School. A written decision will be issued by the Board or his/her designee as soon as is reasonably practicable, but no later than five (5) working days after the next meeting of the Board or a committee thereof. In its discretion, the Board may delegate any such review to a Committee of the Board and hold a hearing where appropriate. If a hearing is held, it will be in closed session to the extent permitted by law. Board members who are interested parties shall excuse themselves from the hearing if such members have a conflict of interest in the subject of the appeal.

Mediation

At any time in the process, the employee may elect to proceed to mediation and the time frames specified in this policy will be suspended. If mediation fails to resolve the complaint, this procedure will resume where it left off prior to the mediation.

T. Whistleblower Policy

The Anchor School requires employees to observe high standards of professional and personal ethics in the conduct of their duties and responsibilities. Employees of TAS are expected to practice honesty and integrity in fulfilling their responsibilities and are expected to comply with all applicable laws and regulations.

All employees of TAS are required to report any suspected violation of any law or regulation that applies to TAS. No employee who in good faith reports a violation shall suffer harassment, retaliation, or any adverse employment consequence. An employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment. This policy is intended to encourage and enable employees to raise serious concerns within TAS prior to seeking resolution outside the school.

Anyone who reports a suspected violation must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation. It is a serious disciplinary offense to knowingly or maliciously make a report that is false and such conduct may result in disciplinary action up to and including termination.

Reports may be made to the Head of School and/or Board of Directors through the school grievance policy, who will, when applicable, notify the sender and acknowledge receipt of the suspected violation. All reports will be promptly investigated, and appropriate corrective action will be taken if warranted by the investigation.

Suspected violations may be submitted anonymously. Reports of suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

U. Open Record & Records Retention Policy

The Governing Board is subject to and shall comply with the Georgia Open Records Act, O.C.G.A. § 50-18-70 et seq., and any subsequent amendment thereof. As a public body, documents created by the board of a charter school are considered public records. "Public records" are broadly defined to include the following: documents; papers; letters; books; tapes; photographs; computer-based or generated information; and similar material prepared and maintained or received in the course of the operation of a public office or agency.



The Governing Board shall maintain its adopted policies, budgets, meeting agendas, and minutes, and shall make such documents available for public inspection. The Anchor School shall make the minutes of all Governing Board meetings available on its website within ten (10) business days after Governing Board approval and for the duration of the Charter.

It is the policy of The Anchor School to retain and destroy records according to the current retention schedule according to the Georgia Archives. For purposes of this policy, unless otherwise specified, no distinction shall be made as to the physical form of records, be they original paper documents, photocopies, electronic documents, or any other format. Nothing in this policy shall preclude records from being retained longer than the retention period specified.

Open Records Act (O.C.G.A. §§50-18-70 through 50-18-76) Definition.

Public records also include records received or maintained by a private person, firm, corporation or other private entity in the performance of a service or function for or on behalf of a public office or agency, unless the records are otherwise protected by specific statute or court order from disclosure. Records prepared or maintained by a private entity in cooperation with public officials, or contemplating the use of public resources and funds are considered public records and are subject to the Open Records Law.

V. Media Policy

This Media Policy applies to all employees of The Anchor School as well as members of the Board of Directors. This policy covers all external news media including broadcast, electronic, and print. Staff, Board and student pictures, voice or work will not be used in external communications without a signed Media Release Form.

To ensure the quality and consistency of organizational information disseminated to media sources, the following policy shall be enforced:

- All media contacts are to be handled by the Head of School, or his or her designee, regardless of who the media representative is or whom he or she represents or how innocuous the request.
- All press releases or other promotional materials are to be approved by the Head of School or his or her designee prior to dissemination.
- If a reporter, producer, or other news media person should contact an employee of The Anchor School or a member of the Board of Directors, the individual who is contacted should refer the media person to the Head of School.

W. Social Media Policy

This Social Media Policy applies to all employees of The Anchor School as well as members of the Board of Directors. Board member and staff reputations are linked with the reputation of the school. Recognizing this fact, it is critical that board members and staff restrict public access to their social media profiles and use discretion about the language, photos, and other content posted to those profiles.

Privacy settings should ensure that board member and staff profiles on social media platforms may not be viewed by the public, or put another way, the profiles may be viewed only by approved friends/followers. Even with privacy settings in place to restrict public access to social media profiles, board members and staff should thoughtfully curate their profiles to ensure they are professional and do not in any way undermine the mission or values of the school.



Section IV – Accounting

The Board of Directors of The Anchor School will ratify, annually review and maintain a separate Fiscal Policy Manual to cover the robust breadth and depth of fiscal compliance and governance. This Policy Manual will contain clear policies to provide for legal compliance, best practices in alignment with Generally Accepted Accounting Principles and best-in-class fiscal governance.

In order to establish these policies, The Anchor School will consult with a back-office provider in creating a draft financial policy handbook which will ultimately be approved by the Board. The policies and procedures will detail the internal institutional controls necessary in reporting, procurement, purchasing, and all transactional approvals. The Head of School, Director of School Operations, and Treasurer will serve as the three chief financial agents of the organization; all processes requiring the disbursement and management of funds will require the proper segregation of duties and double approvals necessary to ensure fiscal oversight, and compliance with the law and GAAP. Minimally, the policies will outline:

- Preparation of financial statements such as Balance Sheets, Cash Flow, YTD Actuals to ensure timely, accurate review by the Finance Committee and Board of Directors
- Budgeting creating and approval process which allow for thorough review by the Finance Committee and approval for timely submission to the authorizer
- Securing a reputable auditor, and engaging in an annual audit
- Bank account management and segregation of duties between issuing and signing checks, opening and closing accounts, and completing monthly reconciliations
- Petty cash management policy and deposit policy
- Contracting and RFP thresholds processes and policies
- Purchasing/procurement controls and segregation of duties
- Inventory/asset management policies
- Expenditure policies

a. GAAP

The accounting procedures used by The Anchor School shall conform to Generally Accepted Accounting Principles (GAAP) to ensure accuracy of information and compliance with external standards.

b. Accounting Basis

- The Anchor School uses the accrual-basis of accounting at year-end, meaning that revenues are recognized in the fiscal year they are earned, and expenses are recognized in the fiscal year that the liability is incurred. This is regardless of when the receipt of or payment of cash takes place.
- Throughout the year, revenues will also be recognized as they are earned and when contributions are received or awarded in accordance with GAAP.
- Bi-monthly per pupil payments will be recognized in the appropriate month with any early payments for a future month deferred and recognized in the appropriate month. A final adjustment will be posted based on an annual reconciliation of average enrollment for the fiscal year.

- Cost reimbursement grants such as CSP, Title I, and Title II will be recognized when those funds are earned when eligible expenses are made. Additional considerations are separately enumerated under “Section XI. Federal Grant Compliance.”

c. Restricted Grant Tracking

The Anchor School shall maintain its general ledger using grant tagging codes for the purposes of tracking restricted revenues and expenses. This is with the specific intention to prevent double-dipping of expenses or use of restricted revenue sources.

d. Cost Center Accounting

The Anchor School shall maintain its general ledger using site codes for tracking revenues, expenses, and balance sheet activity by site if applicable in alignment with SCSC accounting guidance.

e. Capitalization and Depreciation

- The Anchor School will capitalize and depreciate annually all assets of \$5,000 or more to coincide with federal fund guidance on capitalization threshold.
- All assets purchased with an individual value less than \$5,000, but purchased in bulk and exceed \$5,000 in bulk, will be considered as meeting the capitalization threshold. All other assets will be charged annually to an expense in the year incurred. Capitalized assets are recorded at cost and depreciated under the straight-line method over their estimated useful lives which can range from:
 - Leasehold improvements: Lease term or 10 years, whichever is shorter
 - Facility purchases: 30 years
 - Building and site improvements: 30 years
 - Computers and associated technology: 3 years
 - Furniture & equipment: 5 years
- Repair and maintenance costs, which do not extend the useful lives of an asset, are recognized as expenses.
- Throughout the year, items will be recognized as expenses. They will be reviewed at year-end for possible capitalization and depreciation. Depreciation will be calculated from when the item was purchased and will be treated as placed in service at that time unless otherwise specified.
- Items will be tagged when placed in service by the Director of School Operations.
- As part of the annual close, the Director of School Operations will conduct an inventory of all assets, noting condition and location.
- Assets sold, retired, lost, or stolen and related amounts of accumulated depreciation will be eliminated from the asset accounts, and any resulting gain or loss will be recognized within that year.
- Nothing in this practice is to prevent The Anchor School from maintaining an estimated impact of capitalization and depreciation on operating income and fund balance for the year on interim financial statements.

f. Bank Reconciliations

A reconciliation of all bank accounts, whether checking or savings accounts, will be performed monthly by an external back-office provider accountant. The accountant does not have the ability or authority to disburse funds or approve expenses. The Anchor School will provide the back-office provider with either online access or paper copies of the monthly statements no later than the 2nd business day of the following month. The back-office provider will maintain the banking reconciliation documentation for the audit. Un-cleared checks older than six months will be reviewed for reissuance, voidance, or escheatment proceedings in compliance with Georgia State law. Financial irregularities discovered during the banking reconciliation process will be brought to the attention of the Head of School, Director of School Operations, and Board Treasurer.

g. Financial Record Retention and Destruction

All financial records will be retained for no less than seven years. Records include but are not limited to transaction ledgers, bank statements, cancelled and voided checks, payroll records, audits, and tax filings. To the extent that The Anchor School is working with a back-office provider, that provider shall be considered the custodian of financial records. At termination of the relationship, the back-office provider will transfer all financial records to The Anchor School. After seven years, The Anchor School may evaluate its documents for secure destruction or alternatively, archival. Retaining electronic or digital copies of records will be considered compliant with this file retention policy. Nothing in this section will be considered to supersede the organization's broader record retention and destruction policies.

Section V – Banking

a. Checking Account

The board shall authorize the establishment of business or commercial checking account(s). Accounts must be with a federally insured banking institution for the purposes of school operations and the board will ensure that applicable FDIC insurance coverage applies to all accounts. The established checking account(s) shall be the primary account(s) for school financial obligations, as well as the primary account(s) for deposit and receipt of all funds. Authorized signatories to this account shall be the Head of School, Board Treasurer, and Board Chair.

- Checks under \$5,000 will require the signature of the Head of School or Board Treasurer or Board Chair.
- Checks of \$5,000 or more will require the signature of the Head of School AND Board Treasurer.
- Checks payable to the Head of School must be signed by the Board Treasurer. Checks payable to the Head of School of \$5,000 or more will require the signature of Board Treasurer and Board Chair.
- Under no circumstances should the recipient of a check also be a signatory on his or her own check.
- No additional checking accounts shall be established without Board approval.
- Board approval is also required to close a checking account.



b. Savings Account

The Board shall authorize the establishment of business or commercial saving account(s). Accounts must be with a federally insured banking institution for the purposes of school operations and the Board will ensure that applicable FDIC insurance coverage applies to all accounts. Checks will not be written out of the savings account, and any transfer of funds to or from the savings account to the general checking account will be done in consultation with the Board Treasurer and the back-office provider and the school's most current cash forecast. No additional savings accounts shall be established without Board approval. Board approval is also required to close a savings account.

c. Line of Credit

Upon charter authorization, The Anchor School intends to secure a traditional line of credit product with a locally established banking institution. The line of credit amount, rates, and banking institution must be reviewed by the Finance Committee and approved by the full Board of Directors. This line of credit is only to be used when there is a short-term liquidity need to cover expenses or a reimbursable grant necessitates having the ability to cover and pay for expenses until the grant expenses can be reimbursed. The line of credit is not intended to be used to address the basic needs of the school and is not expected to be used as a long-term financing solution. If the line is drawn, it will be paid off as soon as revenue is received to avoid or minimize interest costs.

d. Federal Deposit Insurance

The Anchor School recognizes that deposits are only insured up to \$250,000 per qualified banking institution, not per account, and its bank balance may otherwise exceed the \$250,000. The Board shall review ongoing opportunities to cost-effectively insure excess cash or otherwise diversify its account holdings at federally insured banking institutions, while also evaluating risk and convenience.

e. Petty Cash Fund

The Head of School may authorize the establishment of a petty cash fund of up to \$500 to be maintained by the Director of School Operations on the school site in a locked, secure location. Initial funding of the petty cash fund should be done as a check from the school's checking account. The petty cash fund is maintained by the Director of School Operations. All requests for petty cash must be made in advance and approved by the Head of School. The Director of School Operations records the disbursement in a log and maintains a copy of the approval. Any unused funds along with all receipts for items purchased must be returned to the Director of School Operations. Monthly, the log and transactions will be reconciled by the Director of School Operations and will be submitted to the back-office provider for entry into the accounting system. Upon request by the Head of School and subject to supporting documentation, the back-office provider will generate a check to replenish the petty cash fund up to \$500.

f. Deposits of Receipts

The Anchor School will deposit all funds received on a weekly basis. In line with this:

- The Office Coordinator will open all mail daily, immediately sort and log all checks or money orders and forward them to the Director of School Operations for logging.
- Cash payments, whether for student activities or donations or otherwise, will be strongly discouraged. The Anchor School will direct individuals to use a digital payment service to make a payment electronically to the school in the alternative. If this is not possible, all cash payments received will be logged using a cash receipt book with a carbon copy retained. The Director of School Operations or Head of School will review the cash receipt book each week to ensure that the

total collected matches the supporting documentation. In the event that there are discrepancies that cannot be resolved, these will be reported to the Board Treasurer and Finance Committee.

- Checks and cash waiting to be deposited will be stored in a secure location, only accessible by the Director of School Operations and Head of School.
- The Director of School Operations or Head of School will restrictively endorse (“For Deposit Only”) the checks or money orders to the checking account and deposit them, along with any cash collections. The Director of Operations will then forward on a completed log and copy of associated backup to the back-office provider, including any revenue coding.

Section VI - Purchases

a. Authorization of Expenditures

All purchases of goods and services shall be consistent with the most recently Board-approved budget. These expenditures shall not require additional Board approval, except for contracts for professional services that will exceed or are likely to exceed a total annual amount greater than \$25,000, or if the term will go past one year. Otherwise, all expenditures must be approved by the Head of School or the Director of School Operations, who will review to determine whether it is consistent with the Board-approved budget. Nothing in this section shall prevent the Head of School from making an assessment to rebalance individual line items within the approved budget, provided the adjustments do not otherwise jeopardize the financial health of the school or disrupt the school’s educational program. Adjustments greater than \$25,000 or that otherwise will decrease projected operating income by more than 2% should be discussed with the Board Treasurer.

b. Contracts and Bidding

All professional services shall be provided for under a contract. Any contracts between \$5,000-\$25,000 will require review and feedback on vendor selection by the Finance Committee. The Head of School can execute single year contracts for professional services that will not exceed or are not likely to exceed \$25,000. Any purchases \$25,000 and above shall be purchased through competitive bidding or comparative pricing received in writing by at least three vendors, and approval of selected vendors by a majority vote at a meeting of the Board of Directors. For contracts for professional services that will exceed or are likely to exceed a total annual amount greater than \$25,000 or the term will extend for a period greater than one year, Board approval will be required prior to execution. Length of contracts shall be at the discretion of the Board in consultation with the Head of School, and multiyear contracts shall not be prohibited. Should a contract require Board approval per the above, but timing or other circumstances require execution prior to being approved at a Board meeting, the Head of School, with the approval of both the Board Chair and Board Treasurer, may conditionally execute said contract. The contract will need to then be formally approved at the next Board meeting. Unless otherwise expressly required by conditions of a funding source, The Anchor School shall not be required to conduct a formal bid process for contracted services and goods. However, the Head of School or the Director of School Operations shall make good faith efforts to secure multiple quotes and proposals to ensure a prudent, cost-effective use of funds. Nothing in this section shall require or be interpreted to require The Anchor School to choose or select the lowest cost provider of goods or contracted services, and The Anchor School will have discretion in what criteria it gives most weight when selecting vendors and providers. Any rules or regulations governing expenditure of local, state, and federal funds shall supersede the above when otherwise contradictory.

As a state charter school, TAS must give preference in contracting and purchasing of services and materials to businesses incorporated in Georgia (or qualified to do business within Georgia) that have a regularly maintained and established place of business within the state. This preference only applies when two or more businesses are otherwise similarly situated and qualified.



c. Purchasing

Once sufficient diligence has been done by way of quotes, proposals, and research and an expenditure has been approved, the Director of School Operations or an employee with approval will either request an invoice from a vendor or submit a formal purchase order to request an invoice.

d. Invoice Processing and Requests for Payment

On a weekly basis, the Director of School Operations will review invoices for accuracy, as well as review invoices for goods against received goods and packing slips, and address any inconsistency with vendors. Each week, the Director of School Operations will collate and code all invoices received, including both expense and grant tagging coding. Regardless, if the school will be requesting payment or not, the Director of School Operations will transmit the invoices and coding to the back-office provider. The back-office provider will then generate a payment approval report, which lists all invoices submitted for processing, and it will request payment by the school. Notwithstanding the above, the school shall abide by the back-office provider accounts payable policies and procedures set forth separately regarding documentation requirements, systems, timelines, and submissions.

e. Payment Approvals and Payroll Processing

Payments under \$10,000 must be approved by one of the following authorized positions: Head of School, Board Treasurer, or Board Chair. Payments for \$10,000 or more must be approved by the Head of School AND Board Treasurer or Board Chair. For recurring payments, such as rent, when the amount is fixed, annual approval is allowed. Once the back-office provider receives all the required approvals, The back-office provider will issue payments with the required authorizer signatures. The back-office provider will then generate a check register and send it back to the school as a record of issuance. The check register will be collated with all the check registers for a month and included in the board packet.

f. Debit Card Usage

All debit card usage should cease by December 31st, 2022, or whenever the school is able to open a credit card - whichever is sooner to protect the school from fraudulent charges.

g. Credit Card Usage

Subject to board approval, the school may establish a credit card account. Said credit card account may be of a rewards-bearing variety, but all rewards should be retained for the exclusive use of the school. The use of a credit card shall be allowed with a maximum authorized credit limit of \$5,000 per card holder, subject to credit approval. Credit cards shall only be issued to and used by the Head of School and Director of School Operations. Use by any other person is prohibited. An individual charge should not exceed \$2,500, except with the approval by the Board Treasurer. Total charges in a month shall not exceed the credit card limit. Authorized credit card holders are responsible for submitting itemized receipts or other printed documentation from the vendor for all transactions and providing sufficient reporting as to the necessity of the charge. Credit card statements may not be considered as sufficient supporting documentation. For any purchases that are charged without adequate supporting documentation and justification, the card holder may be required to reimburse the school the amount of such purchases. Because documentation issues might otherwise prevent the back-office provider from having the adequate documentation to pay a credit card statement balance in its entirety or documentation may pertain to the following month's statement, the Head of School or the Director of School Operations must request and specify the amount of all payments towards a credit card statement balance each time. However, every effort should be made to pay the current balance due in full and otherwise mitigate financing charges. Credit card transactions will be enumerated on a credit card register to accompany the financial statements provided to the board monthly.



h. Sales Tax Exemption

Provided The Anchor School has applied for and secured recognition of sales tax-exempt status, The Anchor School is considered exempt from sales tax on goods purchased for their own internal use. The Director of School Operations will ensure all vendors have a copy of the sales tax exemption letter. Prior to submission to the back-office provider, the Director of School Operations will ensure all invoices have sales tax removed. Otherwise, the back-office provider will process invoices as submitted. Sales tax paid by employees for purchases made on behalf of the school and submitted for reimbursement will also be reimbursed.

i. Electronic Payments

To preserve payment approval processes and internal controls, electronic methods (wire or ACH) shall not be permitted for payment of any expenses or reimbursements, except for payroll and associated employer and employee liabilities. Any exception will require approval by the Board Treasurer.

j. Non-Travel Related Employee Reimbursements

Employees, except for the Head of School, will limit purchases made with personal funds that will be submitted for reimbursement to no more than \$500 at a given time, except if the purchases are meals or incidental expenses during school-related travel. Should an employee need to make a purchase with personal funds on behalf of the school for more than \$500, prior approval by the Head of School or Director of School Operations will be required. Employees shall submit a reimbursement request with supporting documentation to the Director of School Operations no later than thirty (30) days from each purchase. A bank or credit card statement may not be considered adequate documentation, and lack of adequate documentation or timely submission may be grounds for non- reimbursement. The Head of School can decline to approve reimbursements at his/her discretion. The following will never be reimbursed: first-class upgrades in air travel or entertainment cost including movies, liquor, or bar costs. Under no circumstances shall the purchase of alcohol be reimbursed. Nothing in this section is to be considered to supersede any personnel policies regarding eligible, reimbursable expenses.

k. Travel-Related Employee Reimbursements

All employees must receive prior written approval by the Head of School for all school-related travel. All efforts should be made to make cost-effective, efficient travel arrangements as expeditiously as possible to mitigate cost escalation. This applies to airfare, accommodations, and registration fees. Travel arrangements should be made and paid for directly by the school by check or by the Director of School Operations using his or her credit card. Meals during school-related travel are considered reimbursable. Meals should be modest but otherwise appropriate with the circumstances and within guidance set by the Internal Revenue Service per diem rates. Receipts or documentation should be retained. Incidental purchases made during school-related travel and otherwise necessary, such as taxi service, are considered reimbursable. Receipts or documentation should be retained. Employees shall submit a reimbursement request with supporting documentation to the Director of School Operations no later than one month from each purchase. A bank or credit card statement may not be considered adequate documentation, and lack of adequate documentation or timely submission may be grounds for non- reimbursement. Under no circumstances shall the purchase of alcohol be reimbursed. Nothing in this section is to be considered to supersede any personnel policies regarding eligible, reimbursable expenses.



1. Employee Mileage Reimbursements

All employees are reimbursed at the current standard mileage rate per mile as determined by the Internal Revenue Service for use of their own vehicle for school-related travel. If mileage is expected to exceed 100 miles or more, it must be pre-approved by the Head of School or Director of School Operations. All employees requesting such mileage reimbursement are required to document the destination of each trip, its purpose, miles driven, and any associated parking fees and tolls, within one month after the travel date, supported by receipts, if applicable. Per IRS guidance, mileage of an employee driving from his or her residence to the school or vice versa is not considered reimbursable. Nothing in this section is to be considered to supersede any personnel policies regarding eligible, reimbursable expenses.

m. Personal Use of School Funds

Use of school funds for personal use is prohibited. Violation of this policy may result in discipline up to and including dismissal or in case of a board member, removal.

Section VII - Payroll

a. New Employees

The Head of School shall hire all employees at both headcount and compensation levels consistent with the approved annual personnel budget. New employees shall complete an application for employment and all necessary paperwork for payroll addition. New employees shall be fingerprinted and background checked consistent with Georgia State law. Fingerprint and background clearance must be received by the school before any employee may start work. Employees shall accrue paid time off (PTO) based on the personnel policies and handbook of the school.

b. Timekeeping for Hourly Employees & Payroll Changes

The Director of School Operations shall track or implement an electronic system for the accurate and timely preparation of timesheets for hourly employees. Based on policies and timelines delineated separately by the back-office provider, the Director of School Operations will submit hourly information prior to each pay day, along with any payroll changes for all staff including salary or rate changes, deduction changes, or other payroll items.

c. Payroll Processing and Accounting

Once the back-office provider receives the payroll changes from the Director of School Operations, the back-office provider will enter the information into the payroll processing system. The back-office provider will generate a payroll preview or Excel worksheet summary and send it to the Head of School and the Director of School Operations for approval. Once payroll has been approved and issued, the back-office provider will upload the payroll information to the accounting system and reconcile the payroll activity to the banking activity.

d. Independent Contractor vs. Employee

Unless otherwise specified, The Anchor School shall treat individuals as employees unless he or she meets the IRS test for classification as an independent contractor. If someone is determined to be an independent contractor, he or she will need to provide a W-9, as well as proof of insurance depending on the nature of his or her work on behalf of the school. All independent contractors shall be formally engaged under a contract that is approved by the Head of School or the board, based on the contract approval criteria previously enumerated. Payments to an independent contractor shall be made pursuant to an invoice for services generated by the independent contractor to the school. The Anchor School, through the back-office provider's assistance, will generate a 1099-Misc for all independent contractors that received \$600 or more in the prior tax year.

Section VIII - Property and Equipment Policies

a. Responsibilities

The Director of School Operations and the Head of School are responsible for ensuring that accurate inventories are maintained so that all assets are safeguarded. The Director of School Operations is responsible for maintaining the equipment and all necessary asset inventories. All assets must be recorded both in the accounting system's general ledger under the fixed asset category and in a separate fixed asset inventory spreadsheet, created in Excel. All property and equipment subject to the school's Capitalization policy must be recorded in the manner described below and depreciated according to the school's Depreciation policy. In addition, the asset name, inventory number, and book value must be entered in the accounting system's general ledger under the fixed asset category. Each item is also physically tagged in a visible area on the item and with the asset number and indication whether the item is property of The Anchor School. All government-furnished property and equipment is also recorded and tagged, with identification information indicating it has been acquired through a government contract. Because the governmental agency owns the item, it is recognized as an expense and is not capitalized. In the event of charter revocation, the item is returned as property of the governmental agency. No employee may use any of the school property, equipment, material, or supplies for personal use without the prior approval of the Head of School. No item of property or equipment shall be removed from the premises without prior approval of the Head of School. All lease agreements for real property will be evidenced by a lease or sublease agreement approved by the Board of Directors and signed by the Head of School. The agreement will identify all the terms and conditions of the lease. Any real estate agreement to rent or sell will require a beneficial interest disclosure.

b. Capitalization Policy

The cost threshold for items purchased by the school to capitalize is \$5,000. Items with an acquisition cost of less than \$5,000 or a useful life of less than one year are expensed in the year purchased. Items with an acquisition cost of more than \$5,000 are capitalized and are subject to the school's depreciation policy, outlined below. There may be instances where depending upon the nature of the purchase, and the expected useful life of the purchase, an item costing less than \$5,000 may be capitalized. For example, a piece of software, which costs \$500 and comes with a license for three years, may be capitalized even though the cost was less than \$5,000. Some assets individually may fall below the capitalization threshold but may be purchased in large quantities by the school (e.g., computers). The school may choose to capitalize these assets as a group. The choice to capitalize an expenditure will be left to the discretion of the Head of School.

c. Inventory Policy

The Director of School Operations performs annual inventory audits, verifying and updating the data contained in the Excel fixed asset inventory spreadsheet. The Director of School Operations should also note if inventory appears to be impaired, damaged, or obsolete. Once complete, this inventory is compared to the fixed assets listed in the general ledger to ensure the value of the assets per the accounting system matches the value of the assets per the spreadsheet. Differences are reconciled by the Director of School Operations and communicated to the third-party service provider for adjustment in the general ledger. The Head of School should be notified if any inventory items are lost, damaged, stolen, or in any way impaired.

d. Depreciation Policy

Any items subject to the Capitalization policy described above are subject to depreciation. The third-party service provider will account for depreciation based on the school's inventories and Depreciation policy. Depreciation associated with the fixed assets will be calculated based on the fixed assets' useful lives using the straight-line depreciation method. Any item that is rendered obsolete (damaged beyond use) will be taken out



of service and fully written off the accounting records. The following items shall be subject to The Anchor School's Depreciation Policy:

- Musical Instruments 3 years
- Computers and associated technology 3 years
- Furniture & equipment 5 years
- Leasehold improvements Lease term or 10 years, whichever is shorter
- Facility purchases 30 years
- Building and site improvements 30 years

e. Disposal of Property and Equipment Policy

Surplus property shall mean property that is no longer in use, is damaged beyond repair, or that the school feels will have no future value to the school's program, and that is declared to be surplus property by the Board. If the school wishes to dispose of equipment or other surplus property with a value of \$500 or greater, the Board shall declare the property surplus and shall direct the staff on the actual means of disposal of the property, such as sale, donation, or destruction and disposal. If the School wishes to sell equipment or other surplus property, the Board shall direct the staff by giving specific guidance regarding the manner in which such property is to be sold. If the School wishes to donate equipment or other surplus property, the Board shall declare the property surplus and authorize the donation. Requirements for potential donating organizations shall include:

- the donating organization is fully independent of the School, with none of the School's Board members or key personnel involved in the donating organization; and the donating organization shall be a non-profit or governmental entity related to education;
- in addition, the School shall secure a receipt from the donating organization for the donated property, and shall remove the asset from the School's books and record the donation as required by state and federal audit guidelines.

Property Acquired with Federal Grant Funds - If the property in question cost \$5,000 or more at the time of acquisition and was acquired with federal grant funds, the School shall notify the federal contract administrator prior to donating or disposing of such property as provided above.

Section IX. Audits & Tax Filings

a. Annual Audit

Each operating year, no later than April 30th, The Anchor School shall engage an independent accounting firm, approved by the State Charter School Commission (SCSC) to perform an audit of the prior year financial statements. The audit shall be performed and the audit report shall be generated in advance of the November 1st submission deadline (or current SCSC submission deadline) with adequate review time by the board in advance of the submission. The audit shall include, but not be limited to, (1) an opinion on the financial statements, (2) an audit of the student accounting and restricted revenue compliance, and (3) an audit of the internal controls practices for the purposes of issuing an opinion on the financial statements. Should The Anchor School expend \$750,000 or more in federal revenues over the course of a fiscal year, the audit for that fiscal year shall be prepared in accordance with any relevant and effective Office of Management and Budget audit circulars. Prior to submission of the audit report to SCSC, the back-office provider and the Finance Committee will review the audit and respond to any management points, findings, material weaknesses, or significant deficiencies identified during the audit. To the extent appropriate, any official change in policies or procedures necessary to address any issue identified during the audit will be brought before the Board of Directors for review.



b. Form 990 Federal Tax Return

The independent accounting firm selected for the audit will prepare the Form 990 tax return to be submitted to IRS by November 15th for the preceding fiscal year. The Board Chair, Board Treasurer, Head of School, Dean of Operations, and the back-office provider shall be notified in the event an extension will be filed by the independent accounting firm. Prior to submission to IRS, a draft copy will be circulated with the Board for review for no less than 5 days.

Section X - Donations & Philanthropy

a. Tax Exempt Status & Charitable Solicitation

To the extent that The Anchor School has filed for and received recognition of its 501(c)3 status as a tax-exempt nonprofit organization, has completed all required annual return filings with IRS, and has completed and maintained all required registration as a charitable organization within the state of Georgia, The Anchor School may engage in charitable solicitations for tax deductible donations as permitted by local, state, and federal law. Nothing in this section shall prevent The Anchor School from utilizing a fiscal sponsor as an intermediary to solicit and receive donations on its behalf to the extent permitted by local, state, and federal law.

b. Donations

The Director of School Operations, separate from the depositing process, will log all cash or cash equivalent donations, recording date of donation, donor's name, donor's contact information, and donation amount. If The Anchor School receives a donation of \$250 or more, the Director of School Operations will provide the donor with a written acknowledgement of the donation in compliance with IRS acknowledgement requirements. A written acknowledgement can be provided for donations of less than \$250 upon request. The Director of School Operations will, to the best of their ability, seek to obtain all donation pledges in written form (date, amount, name of donor).

c. Donated Stock and Securities

The Anchor School should sell all gifts of stock or securities as soon as possible to convert them into cash and transfer to the school's checking account. The value of the gift will be recorded based on the cash proceeds less any brokerage sale fees.

d. In-Kind Donations

Donated goods and services provided for free or at less than market value, and suspected to exceed \$500 in fair value, should be logged at the fair value or the otherwise avoided cost. Fair value shall be determined as specified by the donor and may require follow up by the Director of School Operations. The Director of School Operations shall log all donated goods and services, along with their fair value, and submit this to the back-office provider no later than July 15th for the preceding fiscal year. The back-office provider will record all logged donated goods and services at their fair value or the otherwise avoided cost.

Section XI - Financial Reporting & Planning

a. Budget Approval

An annual budget shall be approved by the Board of Directors no later than June 30 prior to the start of each new fiscal year, after providing at least two opportunities for public input pursuant to O.C.G.A. § 20-2-167.1. The Board of Directors will ensure the budget meets all legal requirements, including that all teachers shall be members of the Georgia Teachers Retirement System and subject to its requirements. The approved budget will include a summary of assumptions and include both restricted and unrestricted revenues and expenses. A summary of the annual operating budget proposed and adopted by the Board of Directors shall be made publicly available on the school's website pursuant to O.C.G.A. § 20-2-167.1 During the year, the

The Anchor School - TAS General Board Meeting - Agenda - Wednesday August 17, 2022 at 7:00 PM



board may adopt an amended budget as expenses and revenue projections change. The annual budget and budget modifications will be reported to SCSC by the required deadlines.

b. Monthly Financial Statements

The back-office provider shall prepare a budget vs. actuals report, balance sheet, statement of cash flow, checking account register, credit card register if applicable, as well as a financial synopsis each month. The Finance Committee and the Board of Directors shall review these materials on a regular basis. The Anchor School's financial reports will be made available to the public in accordance with legal requirements.

c. Quarterly Financial Reports

The back-office provider shall prepare and submit the quarterly financial reports to the SCSC.

Section XII - Other Practices & Financial Matters

a. Conflicts of Interest

Any board member with a financial interest in a matter presented to the board shall fully disclose such interest prior to board discussion on the issue and shall recuse themselves from the discussion and voting on the matter. For more information, please see the board's conflict of interest policies.

b. Related Party Transactions

The Anchor School will identify, recognize, and evaluate any related party transactions.

c. Debt

Any debt, whether loans, notes, or lines of credit must be approved by the governing Board. Information about covenants, restrictions, and other requirements associated with the debt must be reviewed at time of approval. The finance committee in conjunction with the back-office provider will review ongoing compliance with incurred debt, as well as strategies to reduce debt and associated borrowing expense as expeditiously as possible. The Anchor School will avoid utilizing vendor financing unless otherwise preferable to other forms of debt.

d. Political Contributions & Advocacy

The Anchor School will not make any direct or indirect contribution of funds, assets, or resources to a political party or individual serving in or seeking public office. Nothing in this section is to prevent The Anchor School from seeking membership with charter advocacy organizations, local or otherwise, that may be engaged in political campaign activities. Nothing in this section is to prevent The Anchor School from engaging in lobbying, provided it complies with IRS guidance that a substantial part of The Anchor School's activities is NOT devoted to attempting to influence legislation. To the extent the school does engage in lobbying activities, the Head of School or Director of School Operations will provide the back-office provider with an itemization of both direct and indirect costs for entry and recording in the accounting system.

e. Approvals and Authorizations

Throughout the financial policies and procedures, various requirements for approvals and authorizations by the Head of School, Director of School Operations, Board Treasurer, and Board Chair are enumerated. Considering current technological and business practices, an approval shall be deemed valid and in compliance with the financial policies and procedures if it comes in



the form of email approval, written in the affirmative of the specific matter or attachment or set of attachments, from the approver's school email account or if unavailable, his or her regularly used email account. Silent assent over email or verbal approval by phone will not be deemed valid. Board approval or authorization shall be deemed valid if provided pursuant to Board action at an official meeting of the governing Board of The Anchor School.

Section XIII - Federal Grant Compliance

a. EDGAR Compliance

In December 2014, the U.S. Department of Education finalized changes to Education Department General Administrative Regulations ("EDGAR"), incorporating the Uniform Grants Guidance. Title 2 CFR 200 contains all requirements in entirety. Georgia charter schools were advised to augment their written financial policies and procedures to acknowledge and incorporate these changes. In compliance with Title 2 CFR 200, The Anchor School will:

- Formally identify all direct federal awards in its audited financial statements with the CFDA Title and Number, along with Federal Award I.D. # if applicable, Fiscal Year of Award, and Federal Agency.
- Meet any performance reporting requirements related to a federal award as established by the U.S. Department of Education and Georgia State Education Department.
- Maintain adequate documentation for federal award expenditures.
- Implement internal controls over safeguarding of assets and ensuring use for authorized purposes.
- Have the Head of School certify on annual and final fiscal report submissions that the report, to the best of his or her knowledge, is accurate and the expenditures are consistent with required purposes and objectives, and that fraudulent or fictitious information may subject him or her to criminal, civil, or administrative penalties.
- Compare expenditures against budgeted amounts for each award.
- Implement cash management procedures that minimize draws from federal or state agencies and actual expenditures, as well as interest earned.
- Implement cost allowability procedures in accordance with Subpart E—Cost Principles, specifically that the costs are necessary, reasonable, and allocable.
- Implement procurement procedures for federal awards that:
 - Ensure contract administration by school.
 - Checks for any conflict of interests including organizational conflicts of interest.
 - Ensure vendors are selected via a full and open competition process, specifically:
 - No competitive quote solicitation required for purchases under \$3,000.
 - Quotes for purchases between \$3,001 and \$150,000.
 - No selection of noncompetitive proposals unless noncompetitive criteria are met.
 - All procurements over \$150,000 are subject to cost or price analysis.
 - No debarred or suspended vendor participation as listed in SAM, with any contracts over \$25,000 requiring some form of positive verification.
 - Implement equipment and supply definitions, thresholds, usage, and disposition requirements for items purchased using federal awards.



To the extent that it is compatible with and does not supersede new EDGAR requirements, The Anchor School will adhere to OMB Circular A-87, which mandates that:

- All expenses paid with federal funds are necessary or needed for performance or administration of the federal grant in question; or
- The expenses are allocable or benefit the program in proportion to the amount of money paid.
- Expenses are reasonable, in that the LEA follows sound business practices, pays a fair market price, and acts with prudence under the circumstances.
- Funds should be targeted where the needs are greatest.
- Federal grant dollars should be used to supplement, not replace (i.e., supplant) spending that would have happened anyway using local money had the federal funds not been available.

The Anchor School will comply with maintenance of effort (MOE) and excess cost requirements. The back-office provider will be responsible for submitting grant budgets, applications, and budget amendments with the final authorization provided by the Head of School. The Head of School and Director of School Operations will ensure that reimbursement requests cover the appropriate grant period and will verify that all goods and services for which The Anchor School is seeking federal reimbursement have not only been purchased and paid for but have been received by the school.

b. Federal Cash Management Procedures

To comply with requirements under Title 2 CFR 200 in regard to limiting time between receipt and disbursement of funds, as well as interest earned, The Anchor School will implement a reimbursement-only process for federal grants. Specifically, The Anchor School will only apply for reimbursement of actual expenditures to date and never for anticipated expenditures or expenditures that have not otherwise been approved by the GADOE. The back-office provider will review federal cash balances each quarter to ensure interest earned on any federal monies has not exceeded \$500, and if it does, the back-office provider will direct The Anchor School to remit excess amounts to the HHS Payment Management system. Currently, The Anchor School does not have any federal awards that are not otherwise pass-through formula or discretionary grants. Should The Anchor School receive any awards directly from the U.S. Department of Education that requires use of the G5 system, The Anchor School will revisit its federal cash management policies and procedures to ensure continued compliance with Title 2 CFR 200.

c. Federal Cost Allowability Procedures

Title 2 CFR 200 requires that federal award recipients develop procedures to implement cost allowability oversight of use of funds. The Anchor School will comply with the following procedures:

The Head of School, along with the back-office provider, will develop budgets for federal grants collaboratively. Prior to submission to GADOE, the team will review for compliance with program requirements and remove any items not otherwise necessary for implementing the program goals. This includes but is not limited to reviewing the specific items of cost outlined starting at Title 2 CFR 200.420. This determination will be kept on file. Approval of the budget submitted by the applicable program office at GADOE will also be taken to mean tacit approval of the proposed expenditures as being otherwise allowable. Any personnel expenditures submitted to GADOE for

federal grant reimbursement will require either a monthly or semi-annual certification of the individuals' time and effort spent. If the individual or individuals are paid via multiple funding sources, this will also be documented. A job description will be kept on file. Given that The Anchor



School will only apply for reimbursement of expenditures and those expenditures will only be allowable if reimbursed by SCSC, there should be no unallowable costs paid for with federal funds. However, if an unallowable cost is somehow paid for using federal funds, The Anchor School will refund any monies including interest to the federal government.

d. Conflicts of Interest in Federal Procurement

Title 2 CFR 200 requires that conflicts of interest and organizational conflicts of interest are identified and mitigated as part of the procurement process when using federal funds. As a matter of practice, The Anchor School already requires any Board member with a financial interest in a matter present it to the board to fully disclose such interest prior to board discussion on the issue and recuse themselves from the discussion and voting on the matter. As such, it is already applicable. Organizational conflicts of interest occur when a vendor or potential vendor to be paid using a federal award creates an unfair competitive advantage for the vendor or the vendor's objectivity. Examples can include engaging a vendor to create procurement rules for federal awards who can then create biased rules for federal procurement to give itself an upper hand, a vendor is contracted with federal funds to evaluate the proposals or past performance of itself or a competitor, or a vendor has unequal access to information as part of its relationship with the school for future federal procurement. The Anchor School shall identify situations where a vendor may have undue influence over the procurement process using federal funds and take steps to either mitigate or eliminate said influence completely.