

AIPCS II - Federal Program Monitoring 2020-2021 Notification of Findings



California Department of Education
Federal Program Monitoring 2020-21
Notification of Findings

October 23, 2020

This is the official Notification of Findings (NOF) report of the review visit conducted by the California Department of Education (CDE). Because the methodology of the review involves sampling, it is not an assessment of all legal requirements. Nevertheless, the local educational agency (LEA) is responsible for operating its federal categorical programs in compliance with all applicable laws and regulations.

Local Educational Agency: American Indian Public Charter II (01612590114363)
Review Date(s): 10/21/2020 - 10/23/2020
Regional Team Leader(s): Arik Rub, 916-319-0953
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Table with 3 columns: Program Reviewed, Program Reviewer, Total Findings. Rows include Compensatory Education (CE), English Learner (EL), and Expanded Learning Programs (EXLP).

The LEA is required to resolve each Federal Program Monitoring (FPM) finding within 45 calendar days which ends on 12/07/2020. Corrective actions made to resolve findings must be implemented at all sites in the LEA and the new procedures must be used in the future.

When a FPM finding cannot be resolved within this 45 calendar day period, the LEA submits a resolution agreement request using the "Resolution Agreement" process via CMT. Authorized LEA staff may request suggestions from CDE staff on the resolution of findings.

NOTE: Copies of this report were distributed to the Agency. This is a public report and must be made available upon request. (California Public Records Act, Government Code section 6250)

Table with 2 columns: Sites Reviewed, Programs Reviewed. Row 1: No sites included in this review.

Monitoring Results by Program

Compensatory Education



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1. CE 10: Allocations and Reporting

LEAs must disburse Title I, Part A funds in accordance with the approved Consolidated Application and Reporting System (CARS).

The share of Title I, Part A funds to be reserved for homeless children and youths shall be determined based on the total allocation received by the LEA and prior to any allowable expenditures or transfers by the LEA.

American Indian Public Charter (AIPC II) submitted evidence. (i.e. 2019 – 20) AICS II Title I Labor Report, 2019-20 General Ledger). However, it was not clear how AIPC II reserves, tracks, and expends Title I, Part A related budget and expenditures as certified in CARS.

AIPC II must upload to the California Monitoring Tool (CMT) 2019-20 and 2020-21 LEA Budget and Expenditure documents that detail the specific Title I expenditures provided for each reservation as indicated in CARS.

2. CE 11: Allowable Use of Funds

LEAs must disburse Title I, Part A funds in accordance with the approved CARS. The share of Title I, Part A funds to be reserved for homeless children and youths shall be determined based on the total allocation received by the LEA and prior to any allowable expenditures or transfers by the LEA.

AIPC II submitted evidence. (i.e. 2019 – 20) AICS II Title I Labor Report, 2019-20 General Ledger). However, it was not clear how AIPC II reserves, tracks, and expends Title I, Part A related budget and expenditures as certified in CARS.

AIPC II must upload to the CMT 2019-20 and 2020-21 LEA Budget and Expenditure documents that detail the specific Title I expenditures provided for each reservation as indicated on CARS.

3. CE 14: Local Educational Agency Administrative Charges; Time and Effort

The LEA must properly charge and document allowable salaries and wages that are reasonable and necessary in accordance with applicable Title I, Part A program requirements and federal accounting requirements.

A review of the evidence for AIPC II consisted of 3 time accounting records; of which two records were incomplete and a third document was blank; duty statements and an 2019-20 Position Control Report which was uploaded on October 22, 2020 at 1:30 p.m. after the deadline. The CDE reviewer was notified after the 1:00 p.m. final evidence upload deadline that there were 12 AIPC II staff members who were funded in 2019-20, not three members as originally indicated.

To date, the LEA has not resubmitted to the CMT one complete time and effort record per Title I Part A funded staff that documents that the salaries are reasonable and necessary as noted in

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Title I, Part A program and federal accounting requirements. As a result, without receiving the aforementioned information, the salaries as noted are not allowable expenditures under Title I, Part A.

The 2019-20 list of Title I Part A funded staff (which was submitted to the CMT on 10/22/20 at 1:30 p.m.) now reflects the following AIPC II staff (an asterisk after a name listed below denotes the original three names provided to the CDE and those interviewed by the CE reviewer)

Christopher Ahmad, Brian Cabrera*, Cassandra Choi, Mjya Gardner, Stephanie Gaston, Jamelle Jacques, Lawrence Migdale, Vanessa Oden, Carlos Rodriguez*, Charlton Sharpe, Justin Shelmire*, and Axia Vang.

AIPC II must upload to the CMT established written policies and procedures for documenting time and effort of employees that work on Title I (e.g. federal programs) to ensure that sound internal controls and reconciliation of processes are in place; upload one complete time and effort document (i.e. personnel activity reports, semiannual certifications, or other equivalent records) for each of the AIPC II staff funded in part or fully with Title I, Part A; and upload a reverse journal entry for each of 12 staff (salary and benefits) listed above for the first three months of the school year 2019-20. The LEA must credit the journal entry amount back into Title I, Part A fund and cover the amount of the salaries with an alternate funding source.

4. CE 15: Local Educational Agency Equipment Inventory

The LEA spending Title I, Part A funding on equipment shall maintain a historical inventory record for each piece of equipment with an acquisition cost of \$500 or more per unit.

To date, AIPC II has not provided evidence or a comment for this item.

AIPC II must upload to the CMT a historical inventory record, as per instrument item 15(a - I) for each piece of equipment with an acquisition cost of \$500 or more per unit with Title I, Part A funds. If the LEA has not purchased any equipment that meets the aforementioned, please post a comment in the CMT at the instrument item level reflecting that information.

English Learner

1. EL 02: District English Learner Advisory Committee (DELAC)

A school site with 21 or more English learners (ELs), and an LEA with more than 51 ELs must establish a parent advisory committee.

A review of documentation and interviews with parent members of the English Learner Advisory Committee (ELAC) and District English Learner Advisory Committee (DELAC) reveal both advisory committees are not completing the required legal tasks of either committee.

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AIPC II must establish a single parent advisory committee which completes all legally required tasks of an ELAC and DELAC. This corrective action requires all of the following documents to demonstrate completion. Evidence Document 1: The charter school must provide documentation which demonstrates all EL parents at the site were provided an opportunity to vote for the EL parent members of the parent advisory committee. Evidence Document 2: The charter school must provide a final roster of all parent advisory committee members which demonstrates the committee is comprised of at least 50 percent EL parents. Evidence Document 3: The charter school must provide a sign-in sheet from the first meeting held by the new parent advisory committee. The meeting must have been attended by at least 1 EL parent member. Evidence Document 4: The charter school must provide the agenda and minutes from the first meeting. The agenda must reflect an annual goal to accomplish all legally required tasks of a DELAC typical of any single site district of similar size.

2. EL 03: EL Identification and Assessment

Each LEA shall administer the English Language Proficiency Assessments for California (ELPAC) initial assessment to each student eligible for the initial assessment, locally produce the official score in accordance with the directions of the test contractor, and notify the parent or guardian, in writing, of the results of the initial assessment within 30 calendar days after the student's initial date of California enrollment. Each LEA must annually assess the English language proficiency (ELP) and academic progress of each EL. An LEA shall administer the ELPAC summative assessment during the annual summative assessment window. When administering an initial or summative ELPAC assessment to a pupil with a disability, the LEA shall provide designated supports or accommodations, in accordance with the pupil's individualized education program (IEP) or Section 504 plan. When a pupil's IEP or Section 504 plan specifies that the pupil has a disability that precludes assessment such that there are no appropriate accommodations for assessment in one or more of the domains (listening, speaking, reading, and writing), the pupil shall be assessed in the remaining domains in which it is possible to assess the pupil.

After review of documentation provided, the LEA has not demonstrated it administers the ELPAC initial and summative as required by state and federal laws. The LEA has not demonstrated it provides alternate assessment, annual assessment, and designated supports for ELs with an IEP.

AIPC II must complete the following 2 corrective actions.

Corrective Action 1: For each EL on the combined data spreadsheet, the LEA must provide the most recent date and score of ELP assessment. Alternatively, the LEA must explain why an ELPAC assessment date is not provided. If the student takes an alternate ELP assessment, the LEA must state so and identify the alternate assessment.

Corrective Action 2: IEP #1 must be amended to include the most recent ELPAC assessment scores. IEP #2 must be provided in its entirety, or amended to indicate the following: a.) whether the student is an EL; b.) if the student is reclassified c.) all other ELPAC assessment information required to be included in an IEP for an EL. IEP #3 must be amended to include all ELPAC assessment information required to be included in an IEP for an EL. To demonstrate completion of this corrective action, the charter school must provide all 3 amended IEPs with all appropriate

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signatures.

3. EL 04: Implement, Monitor & Revise Title III Plan

Each LEA and consortium receiving Title III funds must annually update, implement, and monitor a Title III plan for the use of funds in a subgrant year. Title III subgrantees must use the funds to increase the ELP of ELs by providing effective language instruction educational programs that meet the needs of ELs and demonstrate success in overcoming language barriers and student academic achievement. Each LEA receiving Title III Immigrant funds must provide instructional opportunities for immigrant children and youth.

A review of documentation provided, and a review of CDE records confirms that AIPC II was the lead of a 3 member Title III consortium in 2019-20. CDE records confirm that the consortium is not fully formed for 2020-21. The memorandum of understandings (MOUs) from 2016-17 and 2020-21 endow AIPC II with fiscal responsibility for Title III funds awarded. A review of the documentation provided reveals discrepancies between the Title III Plan, the MOUs, and actual expenditures. Additionally, AIPC II has not demonstrated it has monitored its use of funds for 2019-20, nor has it updated and implemented an annual plan which aligns with its 2020-21 MOU.

The charter school, as consortium lead, must complete the following corrective actions. Corrective Action 1: The consortium lead must align its 2020-21 Title III plan and its 2020-21 MOU to accurately reflect the planned expenditures for Title III during the current subgrant year. To demonstrate completion of this corrective action, the charter school must provide an updated Title III plan which reflects only activities and expenses which are allowable under the Title III program. If the charter school updates the MOU as a result of updating the Title III plan, then it must also provide a copy of the updated MOU. Corrective Action 2: The charter school must provide any needs assessment or program evaluation and all supporting data which was used to determine goals and updates for the 2020-21 Title III plan. Corrective Action 3: The charter school must definitively state whether it intends to complete its formation of a Title III consortium for 2020-21 and then provide documentation to support the decision reflected in the statement.

4. EL 07: Supplement, Not Supplant with Title III

General fund resources must be used to provide services and programs for ELs, including English Language Development (ELD) and access to the standard instructional program. The provision of such services and programs must not be contingent on the receipt of state or federal supplementary funds. Each LEA must use Title III funds only to supplement, not supplant federal, state, and local public funds that, in the absence of such availability, would have been expended for programs for ELs and immigrant children and youth and in no case to supplant such federal, state, and local public funds. LEA must properly assess charges for direct or indirect costs of Title III Limited English Proficient (LEP) and immigrant student funds for salaries and wages in proportion to the allowable and identified quantity and duties of the employee. pursuant to Uniform Guidance under Title II of the Code of Federal Regulations (CFR): Grants and Agreements (2 CFR Section 200.430[i]), Charges to federal awards for salaries and wages must be based on records that accurately reflect the work performed. These records must be based on a system of internal controls which provides reasonable assurances that the charges are accurate, allowable, and properly allocated. Also pursuant to Uniform

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Guidance under Title II of the CFR: Grants and Agreements (2 CFR Section 200.403[g]), in order to be allowable under federal awards, costs must be adequately documented.

A review of documentation provided reveals the LEA does not properly assess charges for direct or indirect costs of Title III LEP and immigrant student funds for salaries and wages in proportion to the allowable and identified quantity and duties of the employee. Additionally, the LEA has not demonstrated compliance with Uniform Guidance to properly document costs charged to federal programs, specifically Title III.

AIPC II must complete the following corrective actions.

Corrective Action 1: The charter school, as the consortium lead, must reverse all Title III funds awarded during 2019-20. To demonstrate completion of this corrective action, the charter school must provide to the CDE a fiscal record showing the total amount of Title III funds reversed from general funds.

Corrective Action 2: The charter school, as the consortium lead, must provide a current general ledger for Title III resources for the current fiscal year (2020-21). The general ledger must include all of the following: chart of accounts, beginning and ending balance, detailed transaction line items which include vendor name and purchase date. The general ledger must identify the federal resource code for which it is recorded and maintained.

Corrective Action 3: The charter school must develop an internal control and policy which details the uses, allowable activities, internal approval, and method of documenting Title III expenses. To demonstrate the completion of this corrective action, the charter school must provide to the CDE a written document approved by the local governing board which describes in detail the adopted local policy for expending and approving usage of Title III resources. The document must identify a staff member or members who will grant such approval for Title III activities and other expenditures.

Corrective Action 4: The charter school must update, revise, or re-develop a job description for the Educational Coordinator position which accurately reflects the total activity for which the employee is compensated from Title III as well as any and all other funding sources, not exceeding 100 percent of the compensated activities. To demonstrate completion of this corrective action, the charter school must submit to the CDE, a completed job description which meets the requirements specified above.

5. EL 08: Time and Effort Requirements (Title I and Title III)

Each employee funded in part from Title III and in part from a second funding source, or any employee paid from multiple cost objectives, must provide support for the distribution of their salary or wages among specific activities or cost objectives, or an approved sampling method must be used. Each employee funded solely under Title III must complete a semiannual certification of such employment. Additionally, pursuant to Uniform Guidance under Title II of the CFR: Grants and Agreements (2 CFR Section 200.61-62, and Section 200.303), the LEA must establish and maintain effective internal control over the Federal award that provides

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reasonable assurance that the LEA is managing the Federal award in compliance with Federal statutes, regulations, and the terms and conditions of the Federal award.

A review of documentation provided, as well as interviews and discussions with LEA leadership and employees, reveals that AIPC II has not established such internal controls as required by state and federal laws. Additionally, AIPC II has not established any time and effort policies or procedures to ensure that the distribution of salary and wages among specific activities or cost objectives are accurately documented and reported.

AIPC II must complete the following 3 corrective actions.

Corrective Action 1: The charter school must develop written time and effort reporting policies and procedure which comply with the California School Accounting Manual Procedure (CSAM) 905 as well as Education Department General Administrative Regulations (EDGAR) and Uniform Guidance requirements identified in 2 CFR Section 200.61-62, and Section 200.303. The time and effort policies and procedures must include requirements for all federal programs and additionally must specifically address the supplemental and restrictive nature of Title III program resources. To demonstrate the completion of this corrective action, the LEA must submit to the CDE a written document approved by the local governing board which details time and effort reporting policies and outlines the procedures of time and effort approval by a staff member with expertise in the EDGAR, Uniform Guidance requirements and Title III. The LEA must additionally identify the staff member or members who will grant such approval for Title III activities and other expenditures.

Corrective Action 2: The charter school must establish and implement, as part of its time and effort policies and procedures, a process by which any federally funded employee records the specific activities performed during the time compensated with each and any federal funding source. In order to demonstrate completion of this corrective, this policy and correlating procedure must appear in the written policies and procedures.

Corrective Action 3: The charter school must provide training in the new policy to: 1). all employees who are funded in part, or in whole, with Title III resources; and 2). all employees who review, approve, or determine expenditures for Title III resources. To demonstrate completion of this corrective action, the charter school must provide to the CDE, a roster of training attendees, a sign-in sheet, and training materials.

Corrective Action 4: The charter school must develop a time and effort reporting documentation process compliant with CSAM Procedure 905, to be completed by federally funded employees on a monthly or semiannual basis as appropriate to the cost objective and federal funding portion of the employee's salary and wage compensation. To demonstrate completion of this corrective action, the charter school must submit to the CDE a minimum of 3 months of time and effort reporting for each Title III funded employee.

6. EL 10: Reclassification

LEA must reclassify a student from EL to proficient in English by using a process and criteria

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that includes, but is not limited to the following:

assessment of ELP, teacher evaluation, opportunities for parent consultation and opinion, and comparison of student performance.

A review of documentation provided reveals that AIPC II has not adopted the ELPAC overall 4 as the sole requirement for criterion 1, as adopted by the state board.

AIPC II must complete the following corrective action. The charter school must revise its reclassification criteria to remove any additional requirements it currently imposes in addition to the ELPAC overall 4 in criterion 1. To demonstrate completion of this corrective action, the charter school must provide an updated board approved document reflecting reclassification criterion 1 as an ELPAC overall 4.

7. EL 11: Teacher EL Authorization

Teachers assigned to provide ELD and instruction in subject matter courses for ELs must have the appropriate authorizations.

A review of documentation provided reveals that AIPC II employs teachers of record without appropriate EL authorization.

The charter school must complete the following corrective action. For each teacher whose EL authorization is indicates as "N/A", please provide either the EL Authorization, Temporary County Certificate, or an explanation describing why the EL authorization does not apply. For any teachers who do not have ELs assigned to their classroom, please provide a class roster of student names with EL status indicated for each.

8. EL 14: ELD

As part of the standard instructional program provided through general funds, all identified ELs must receive a program of ELD instruction, which shall include designated and integrated ELD. ELD instruction must be designed for ELs to develop proficiency in English as rapidly and effectively as possible and to meet state priorities. Each LEA must take appropriate action to overcome language barriers that impede equal participation by students in instructional programs. Title III funds shall be used to supplement the standard instructional ELD program. ELD must be based on sound educational theory, implemented effectively with adequate resources and personnel, and, after a trial period, evaluated for its effectiveness in overcoming language barriers.

A review of documentation provided reveals that AIPC II does not provide a comprehensive program of ELD which includes designated and integrated ELD as presented in the ELD framework. Documentation provided presents designated ELD as an intervention and does not consistently present designated ELD as a protected time during the regular school day. Additionally, documentation does not present integrated ELD as instruction in which the state-adopted ELD standards are used in tandem with the state-adopted academic content standards

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in all academic subject matters.

The charter school must complete the following 3 corrective actions.

Corrective Action 1: The charter school must develop a comprehensive description of its ELD program or programs. The program description must include all of the following information: definitive identification of the adopted ELD curriculum (or curricula) and for which grade levels it is used, a description of designated ELD program content for all grades present in the LEA (K-8) and all ELP levels, a description of how ELs are grouped, the EL authorization held by the ELD teacher, and a complete description of the role of any classified staff in the implementation of the ELD program and an identification of such staff by job title. For grades 6-8, the program document must additionally include designated ELD course descriptions which identify each designated ELD course's grade and ELP level. The program description must also address integrated ELD and the instructional strategies used in subject matter content and courses for all grade levels (K-8). To demonstrate completion of this corrective action, the charter school must provide the program document to the CDE.

Corrective Action 2: The charter school must implement designated ELD as protected time during the regular instructional day. To demonstrate completion of this corrective action, the charter school must provide a current teacher daily schedule from all K-5 teachers at AIPC II.

Corrective Action 3: The charter school must submit the evaluation process it used to select its current ELD curriculum as well as any evaluation, supporting data or other documentation which was used. If this is not available, then charter school must conduct a comprehensive evaluation to determine the effectiveness of its current ELD program in overcoming language barriers. To demonstrate completion of this corrective action, the charter school must provide a program evaluation either prior to, or after the implementation of, its current ELD program.

9. EL 15: Access to Standard Instructional Program

Each LEA must ensure that ELs in middle and high school are not denied participation in the standard instructional program, which, at a minimum, means enrollment in the standard instructional program of core curriculum courses including reading/language arts, mathematics, science, and history/social science, and courses required for middle school grade promotion. Each LEA must monitor student academic progress and provide additional and appropriate educational services to ELs in grades TK–12 for the purposes of overcoming language barriers in each subject matter.

A review of documentation provided reveals that AIPC II does not have a standard process for providing intervention support to ELs in subject matter courses, nor does the charter school have a standard procedure for monitoring the academic progress of ELs in order to facilitate such services.

The charter school must complete the following corrective action. The charter school must develop a formalized procedure for monitoring the academic progress of ELs in order to effectively place the students into subject matter intervention for all grade levels. The procedure

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must include guidelines and criteria for placement in intervention as well as criteria for exiting such intervention. To demonstrate completion of this corrective action, the charter school must provide the completed document to the CDE.

Expanded Learning Programs

1. EXLP 09: Funding Direct Services to Pupils

LEA allocates no less than 85 percent of total grant amount to the school site for direct services to pupils. The agency spends no more than 15 percent of the amount of the grant for administrative costs, which includes any indirect costs.

After reviewing documentation submitted by AIPC II, there was insufficient evidence to substantiate if the agency allocates no less than 85 percent of total grant amount to the school site for direct services to pupils and spends no more than 15 percent of the amount of the grant for administrative costs, which includes any indirect costs.

AIPC II must submit documentation, financial activity reports, Bay Area Community Resources (BACR) invoices processed by the agency for payments that shows at least 85 percent of expenditures at BACR were for direct services to students and no more than 15 percent is spent on administrative costs, which includes any indirect costs. The agency must also submit documentation in the CMT to show how any fee charged to students parents is expended.

2. EXLP 10: Local Contribution of Cash or In-Kind

LEAs operating an After School Education & Safety Program (ASES) program obtains a local contribution of cash or in-kind local funds equal to not less than one-third of the total grant amount. Facilities or space usage may fulfill not more than 25 percent of the required local match.

After reviewing documentation submitted by AIPC II, there was insufficient evidence to substantiate that the agency obtains a local contribution of cash or in-kind local funds equal to not less than one-third of the total grant amount.

AIPC II must submit to the CMT documentation, financial activity reports, including a description of the expenditure, date, vendor, and resource code to demonstrate that the agency obtains a local contribution of cash or in-kind local funds equal to not less than one-third of the total grant amount.

3. EXLP 11: Supplement not Supplant

LEAs use categorical funds only to supplement, and not supplant, state and local funds.

After reviewing documentation submitted by AIPCII, there was insufficient evidence to substantiate whether the agency uses categorical funds only to supplement, and not supplant,

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state and local funds.

AIPC II must submit to the CMT documentation, financial activity reports, including a description of the expenditure, date, vendor, and resource code to demonstrate that the agency uses categorical funds only to supplement, and not supplant, state and local funds.

4. EXLP 16: Staff Minimum Qualifications

LEAs must ensure that all staff members who directly supervise pupils meet the minimum qualifications for an instructional aide according to the district policies.

Based on the review of staff documentation uploaded by AIPC II, and the unavailability of a list of all expanded learning staff at the site, the CDE was unable to verify that all staff members who provide direct services to pupils meet the minimum qualifications.

AIPC II must provide in the CMT a list of all staff providing the expanded learning services, and evidence that all staff who directly supervise pupils meet the minimum requirements for an instructional aide according to the agency's policies. Evidence may include: Certificate of Completion of the Paraprofessional Exam, or a transcript demonstrating that staff members have acquired the required amount of 48 undergraduate semester units. In addition, the agency must submit in the CMT similar documentation for staff providing fee-based programming at this site.

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Board Policies

Cover Sheet

Board Policy 315 Federal Fund Management

Section: III. Action Items
Item: A. Board Policy 315 Federal Fund Management
Purpose: Vote
Submitted by:
Related Material: AIMS semi-annual-certification-template.docx
BP 315 Federal Fund Management.docx
personnel-activity-report-template.xlsx



Semi-Annual Certification
Activity Report for Employees Working on a Single Cost Objective
School Year 2020-2021

School Site _____

Federal Program: _____ Title I _____

For the Six-Month Period of: *(Circle the completed six month time period and fill in the year)*

January-June 20 _____

July-December 20 _____

I certify that the employee listed below worked 100% of their time in the above six month time period on activities authorized by the federal program stated above. **Include only staff fully funded through Federal Funds.*

Employee Name	Employee Title
JOB DESCRIPTION	

Employee Signature

Date

Supervisory Official's Signature

Date

This form is to be completed every six months for any employee who is paid solely with federal funds from a single cost objective.

A school that has any staff that are split funded between Title I and another funding source must instead complete a Time and Effort Program Activity Report (PAR).

American Indian Model Schools Fiscal Policy

FP- 315 Federal Fund Management

The Board of Trustees recognizes the district's responsibility to maintain fiscal integrity and transparency in the use of all funds awarded through federal grants. The district shall comply with all requirements detailed in any grant agreement with an awarding agency and with the federal Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards specified in 7 CFR 200.0-200.521 and any stricter state laws and district policy.

Any goods or services purchased with federal funds shall be reasonable in cost and necessary for the proper and efficient performance or administration of the program.

The Superintendent or designee shall ensure that the district's financial management systems and procedures provide for the following: (2 CFR 200.302)

1. Identification in district accounts of each federal award received and expended and the federal program under which it was received

(BP - [309 Budgets](#))

2. Accurate, current, and complete disclosure of the financial and performance results of each federal award or program in accordance with the reporting requirements of 2 CFR 200.327 and 200.328

(BP – [312 Financial Reporting](#))

3. Records and supporting documentation that adequately identify the source and application of funds for federally funded activities, including information pertaining to federal awards, authorizations, obligations, unobligated balances, assets, expenditures, income, and interest

(BP - [311 Record Retention and Disposal](#))

4. Effective controls and accountability for all funds, property, and other assets and assurance that all assets are used solely for authorized purposes

5. Comparison of actual expenditures with budgeted amounts for each federal award

6. Written procedures to implement provisions governing payments as specified in 2 CFR 200.305

7. Written procedures for determining the allow ability of costs in accordance with 2 CFR 200.400-200.475 and the terms and conditions of the federal grant award

The Superintendent or designee shall develop and implement appropriate internal control processes to reasonably assure that transactions are properly executed, recorded, and accounted for so that the district can prepare reliable financial statements and federal reports, maintain accountability over assets, and demonstrate compliance with federal laws, regulations, and conditions of the federal award. (2 CFR 200.61, 200.62, 200.303)

Equipment purchased with federal funds shall be properly inventoried and adequately maintained to safeguard against loss, damage, or theft of the property.

American Indian Model Schools Fiscal Policy

(BP -601 [Disposal of Property and Equipment](#))

(AR – [315 Federal Funding Management Inventory](#))

All staff involved in the administration or implementation of programs and activities supported by federal funds shall receive information and training on the allowable use of federal funds, purchasing procedures, and reporting processes commensurate with their duties.

The district shall submit performance reports to the awarding agency in accordance with the schedule and indicators required for that federal grant by law and the awarding agency. As required, such reports may include a comparison of actual accomplishments to the objectives of the federal award, the relationship between financial data and performance accomplishments, the reasons that established goals were not met if applicable, cost information to demonstrate cost effective practices, analysis and explanation of any cost overruns or high unit costs, and other relevant information. The final performance report shall be submitted within 90 days after the ending date of the grant. (2 CFR 200.301, 200.328)

(FP-[1500 Management and Reporting Procedures](#))

Legal Reference:

EDUCATION CODE

42122-42129 Budget requirements

CODE OF FEDERAL REGULATIONS, TITLE 2

180.220 Amount of contract subject to suspension and debarment rules

200.0-200.521 Federal uniform grant guidance, especially:

200.1-200.99 Definitions

200.100-200.113 General provisions

200.317-200.326 Procurement standards

200.327-200.329 Monitoring and reporting

200.333-200.337 Record retention

200.400-200.475 Cost principles

200.500-200.521 Audit requirements

CODE OF FEDERAL REGULATIONS, TITLE 34

76.730-76.731 Records related to federal grant programs

CODE OF FEDERAL REGULATIONS, TITLE 48

2.101 Federal acquisition regulation; definitions

Presented to Board November 30, 2020

Cover Sheet

Administrative Regulation 315a Federal Fund Management

Section: III. Action Items
Item: B. Administrative Regulation 315a Federal Fund Management
Purpose: Vote
Submitted by:
Related Material: AR 315a Federal Fund Management.docx

AR 315(a) Federal Fund Management

To ensure the lawful expenditure of any federal formula or discretionary grant funds awarded to the district, the Superintendent or designee shall comply with the requirements of the Office of Management and Budget's Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (the "Uniform Guidance"), as contained in 2 CFR 200.0-200.521 and Appendices I-XII.

Allowable Costs

Prior to obligating or spending any federal grant funds, the Superintendent or designee shall determine whether a proposed purchase is an allowable expenditure in accordance with 2 CFR 200.400-200.475 and the terms and conditions of the award. He/she shall also determine whether the expense is a direct or indirect cost as defined in 2 CFR 200.413 and 200.414 and, if the purchase will benefit other programs not included in the grant award, the appropriate share to be allocated to the federal grant.

The Superintendent or designee shall review and approve all transactions involving federal grant funds and shall ensure the proper coding of expenditures consistent with the California School Accounting Manual.

(AR. 315(d) Federal Fund Management: Compliancy Review)

(BP. 302 – Basis of Presentation)

Period of Performance

All obligations of federal funds shall occur on or between the beginning and ending dates of the grant project and shall be paid no later than 90 days after the end of the funding period, unless specifically authorized by the grant award to be carried over beyond the initial term of the grant. (2 CFR 200.77, 200.308, 200.309, 200.343)

Procurement

When procuring goods and services with a federal grant, the Superintendent or designee shall comply with the standards contained in 2 CFR 200.317-200.326 and Appendix II of Part 200, or with any applicable state law or district policy that is more restrictive.

As appropriate to encourage greater economy and efficiency, the Superintendent or designee shall avoid acquisition of unnecessary or duplicative items, give consideration to consolidating or breaking out procurements, analyze lease versus purchase alternatives, consider entering into an interagency agreement for procurement of common or shared goods and services, and/or use federal excess or surplus property. (2 CFR 200.318)

The procurement of goods or services with federal funds shall be conducted in a manner that provides full and open competition in accordance with state laws and district regulations and the following requirements:

1. Any purchase of supplies or services that does not exceed the "micro-purchase" threshold specified in 48 CFR 2.101 may be awarded without soliciting competitive quotes, provided that the district considers

the price to be reasonable and maintains written evidence of this reasonableness in the record of all micro-purchases. (2 CFR 200.67, 200.320)

2. For any purchase that exceeds the micro-purchase threshold but is less than the bid limit required by Public Contract Code [20111](#), the Superintendent or designee shall utilize "small-purchase" procedures that include obtaining price or rate quotes from an adequate number of qualified sources. (2 CFR 200.320). The micro threshold has been defined as \$10,000.

3. Contracts for goods or services over the bid limits required by Public Contract Code [20111](#) shall be awarded pursuant to California law - Bids, unless exempt from bidding under the law.

4. If a purchase is exempt from bidding and the district's solicitation is by a request for proposals, the award may be made by either a fixed-price or cost-reimbursement type contract awarded to the entity whose proposal is most advantageous to the program, with price and other factors considered. (2 CFR 200.320)

5. Procurement by noncompetitive proposals (sole sourcing) may be used only when the item is available exclusively from a single source, the need or emergency will not permit a delay resulting from competitive solicitation, the awarding agency expressly authorizes sole sourcing in response to the district's request, and/or competition is determined inadequate after solicitation of a number of sources. (2 CFR 200.320)

6. Time and materials type contracts may be used only after a determination that no other contract is suitable and if the contract includes a ceiling price that the contractor exceeds at its own risk. Time and materials type contract means a contract for which the cost is the sum of the actual cost of materials and direct labor hours charged at fixed hourly rates that reflect wages, general administrative expenses, and profit. (200.328)

For any purchase of \$35,000 or more, the Superintendent or designee shall verify that any vendor which is used to procure goods or services is not excluded or disqualified by the federal government. Verify through the US Department of Labor (2 CFR 180.220, 200.213)

All solicitations shall incorporate a clear and accurate description of the technical requirements for the material, product, or service to be procured. Such description shall not, in competitive procurements, contain features which unduly restrict competition. The description shall avoid detailed product specifications to the extent possible, but may include a statement of the qualitative nature of the material, product, or service to be procured and, when necessary, shall set forth those minimum essential characteristics and standards to which it must conform if it is to satisfy its intended use. When it is impractical or not economical to make a clear and accurate description of the technical requirements, a brand name or equivalent description may be used to define the performance or other salient requirements of procurement, clearly stating the specific features of the named brand which must be met by offers. In addition, every solicitation shall identify all requirements which the offer must fulfill and any other factors to be used in evaluating bids or proposals. (2 CFR 200.319)

The Superintendent or designee shall maintain sufficient records to document the procurement, including, but not limited to, the rationale for the method of procurement, selection of the contract type, contractor selection or rejection, and the basis for the contract price. (2 CFR 200.318)

The Superintendent or designee shall ensure that all contracts for purchases using federal grant funds contain the applicable contract provisions described in Appendix II to Part 200 - Contract Provisions for Non-Federal Entity Contracts Under Federal Awards. (2 CFR 200.326)

Capital Expenditures

The Superintendent or designee shall obtain prior written approval from the awarding agency before using federal funds to make capital expenditures, including the acquisition of land, facilities, equipment, and intellectual property and expenditures to make additions, improvements, modifications, replacements, rearrangements, reinstallations, renovations, or alterations to capital assets that materially increase their value or useful life. (2 CFR 200.12, 200.13, 200.20, 200.33, 200.48, 200.58, 200.89, 200.313, 200.439)

Conflict of Interest

No Board of Trustees member, district employee, or district representative shall participate in the selection, award, or administration of a contract supported by federal funds if he/she has a real or apparent conflict of interest, such as when he/she or a member of his/her immediate family, his/her partner, or an organization which employs or is about to employ any of them has a financial interest in or a tangible personal benefit from a firm considered for a contract. Such persons are prohibited from soliciting or accepting gratuities, favors, or anything of monetary value from contractors or subcontractors unless the gift is an unsolicited item of nominal value. (2 CFR 200.318)

Employees engaged in the selection, award, and administration of contracts shall also comply with Board policy - Conflict of Interest.

Cash Management

The Superintendent or designee shall ensure the district's compliance with 2 CFR 200.305 pertaining to payments and cash management, including compliance with applicable methods and procedures that minimize the time elapsing between the transfer of funds to the district and the district's disbursement of funds. (2 CFR 200.305)

(BP- [1100 Cash Management Procedures](#))

When authorized by law, the district may receive advance payments of federal grant funds, limited to the minimum amounts needed and timed in accordance with the actual immediate cash requirements of the district for carrying out the purpose of the program or project. Except under specified conditions, the district shall maintain the advance payments in an interest-bearing account. The district shall remit interest earned on the advanced payment to the awarding agency on an annual basis, but may retain interest amounts specified in 2 CFR 200.305 for administrative expenses. (2 CFR 200.305)

When required by the awarding agency, the district shall instead submit a request for reimbursement of actual expenses incurred. The district may also request reimbursement as an alternative to receiving advance payments. (2 CFR 200.305)

The Superintendent or designee shall maintain source documentation supporting the expenditure of federal funds, such as invoices, time sheets, payroll stubs, or other appropriate documentation.

Personnel

All district employees who are paid in full or in part with federal funds, including employees whose salary is paid with state or local funds but is used to meet a required match or in-kind contribution to a federal program, shall document the amount of time they spend on grant activities. (2 CFR 200.430)

(AR- [315\(c\) Time Accounting](#))

Records

Except as otherwise provided in 2 CFR 200.333, or where state law or district policy requires a longer retention period, financial records, supporting documents, statistical records, and all other district records related to a federal award shall be retained for a period of three years from the date of submission of the final expenditure report or, for a federal award that is renewed quarterly or annually, from the date of the submission of the quarterly or annual financial report. (2 CFR 200.333)

(BP- 311 [Record Retention and Disposal](#))

Appendices

Procurement

Micro-purchase means an [acquisition](#) of [supplies](#) or services using [simplified acquisition procedures](#), the aggregate amount of which does not exceed the [micro-purchase threshold](#).

Micro-purchase threshold means \$10,000

Cover Sheet

Administrative Regulation 315b Federal Fund Inventory

Section: III. Action Items
Item: C. Administrative Regulation 315b Federal Fund Inventory
Purpose: Vote
Submitted by:
Related Material: AR 315b Federal Fund Inventory.docx

American Indian Model Schools Administrative Regulation

AR 315(b) Federal Fund Management Inventory

Inventories

In order to provide for the proper tracking and control of district property, the Superintendent or designee shall maintain an inventory of equipment in accordance with law for the following:

1. All equipment items currently valued in excess of \$500 (Education Code 35168)
2. All equipment items purchased with state and/or federal categorical funds that have a useful life of more than one year with an acquisition cost of \$500 or more per unit.

In addition, the Superintendent or designee may maintain a list of specific items which shall be inventoried for internal control purposes regardless of their initial cost or current value.

The inventory shall contain a record of the following information: (Education Code 35168; 5 CCR 3946)

1. Name and description of the property
2. Identification number
3. Original cost of the item of equipment or a reasonable estimate if the original cost is unknown
4. Date of acquisition
5. Location of use
6. The date and method of disposal

([FP-601 Disposal OF Property and Equipment](#))

In addition to the information specified in items #1-6 above, the following information shall be recorded for equipment acquired with state and/or federal categorical funds unless otherwise specified in law: (5 CCR 3946; 2 CFR 200.313)

1. Source of the property (funding source)
2. Titleholder
3. Percentage of federal participation in the cost of the property
4. Use and condition of property
5. Sale price of the property upon disposition and method used to determine current fair market value

([FP-314 Federal Fund Management](#))

American Indian Model Schools Administrative Regulation

At the time of purchase, the Superintendent or designee shall affix a label to the equipment containing the identification number and the district name. Equipment items purchased with categorical program funds shall also be labeled with the name of the project in accordance with 5 CCR 3946.

Whenever an equipment item is moved to a new location or the equipment is used for a new purpose, the new location or purpose shall be recorded in the inventory.

A copy of the inventory shall be kept at the district office and at the appropriate school site.

(FP-[311 Record Retention and Disposal](#))

The Superintendent or designee shall annually submit an inventory listing of federally owned property in its custody to the federal agency that granted the award. (2 CFR 200.312)

Physical Inventory

At least once every two years, a physical inventory of equipment shall be conducted and the results reconciled with the property records. (2 CFR 200.313)

The Superintendent or designee shall establish procedures for conducting the physical inventory which shall include, but not be limited to, designation of person(s) responsible for coordinating and conducting the inventory, preparation and distribution of count sheets, procedures for implementing the inventory, and procedures for conducting a recount to substantiate the validity of the inventory.

The Superintendent or designee shall investigate any differences between the quantities determined by the physical inspection and those in the accounting records.

EQUIPMENT INVENTORY- Federal Program Monitoring

AIMS K-12 Equipment Inventory-4400 Object Code

The LEA spending Title I, Part A funding on equipment must maintain a historical inventory record for each piece of equipment with an acquisition cost of \$500-\$4999 per unit. The record describes the acquisition by:

- (a) BCSD Asset Tag #
- (b) Type/description
- (c) Model/name
- (d) Serial number
- (e) Funding source
- (f) Acquisition date
- (g) Cost (Financial)

American Indian Model Schools Administrative Regulation

(h) Location

(i) Current condition

(j) Transfer, replacement or disposition of obsolete or unusable equipment

AIMS Operations Department must conduct a physical check of the inventory of equipment within the past two years and reconcile the result with inventory records.

A. ORDERING:

Title I Equipment (costing more than \$500) is for supplemental purposes and must be for student use. This expenditure must be included in the SPSA and or an SPSA Addendum. The LCAP Advisory Committee must approve Title I equipment as documented on the Equipment Justification Form.

B. DISTRICT INVENTORY FOR ITEMS OVER \$500

Any piece of equipment costing \$500 (not including tax and delivery charges) or more (not to exceed \$4999) must be labeled and inventoried. Inventories must be completed and maintained and a working file kept on file at all times.

C. SCHOOL TECHNOLOGY INVENTORY FOR ITEMS PURCHASED FOR LESS THAN \$500

Items purchased less than \$500 must reflected in the Purchase Order System Spendwise and also be kept track of on google inventory form.

D. MAINTENANCE AGREEMENTS

Schools must check with Operations to ensure that accurate contracted maintenance costs are budgeted.

EQUIPMENT INVENTORY PROCEDURES

Inventory Printouts

Our Back office provider (CSMC) will email an electronic equipment inventory printout to the schools, Director of Operations and Chief Business Officer. Equipment purchased for \$500 or more will be on the inventory printout. (Other resource codes that may exist: 3010-Title I, 4035-Title II, 4203-Title III and/or 010-ASES). The designee in charge of equipment inventory must use the printout as their working copy. Please check the printout for accuracy and update any items that have been relocated to different locations.

Discard Instructions

To discard furniture or a large quantity (more than 5 items):

- ✓ Find a location on campus to store items. The location should be a non-accessible area to students and safe from weather.
- ✓ Email operations@aimsk12.org the description, quantity, and the location where the items are stored forms.

American Indian Model Schools Administrative Regulation

Stolen Items

A "Incident Report" form must be completed for items which are stolen from your site. You need to attach any backup you have (i.e. requisitions, inventory list, PO's) so the correct item can be removed from your inventory.

(If stolen items are over \$10,000 in value, then contact Kellie Minor at kellie.minor@aimsk12.org)

Legal Reference:

EDUCATION CODE

35168 Inventory of equipment

CODE OF REGULATIONS, TITLE 5

3946 Control, safeguards, disposal of equipment purchased with consolidated application funds

16022-16023 Classification of records

16035 Historical inventory of equipment

UNITED STATES CODE, TITLE 20

2301-2414 Carl D. Perkins Career and Technical Education Act

CODE OF FEDERAL REGULATIONS, TITLE 2

200.0-200.521 Federal uniform grant guidance

Presented to Governance Committee November 10,2020

Cover Sheet

Administrative Regulation 315c Federal Fund Time Accounting

Section: III. Action Items
Item: D. Administrative Regulation 315c Federal Fund Time Accounting
Purpose: Vote
Submitted by:
Related Material: AR 315c Federal Fund Management Time Accounting.docx

American Indian Model Schools Administrative Regulation

AR 315(c) Federal Fund Management Time Accounting

HEAD OF SCHOOL/SITE MANAGER RESPONSIBILITIES

Each Head of Schools or designated site manager must ensure that all federally funded employees are familiar with the time documentation guidelines and are complying with these requirements. Please review the Employee Guidelines outlined below.

FEDERALLY FUNDED EMPLOYEE TIME DOCUMENTATION

Documentation is required to ensure that the district is properly charging salaries and wages that are reasonable, necessary and allowable in accordance with applicable federal program requirements. The resource codes involved with federal programs reviewed by CDE and that require time accounting forms are Title I Part A & D (Resource 3010 Restrictor 01); Title II Part A Resource 4035 Restrictor 02), Title III EL (Resource 4203 Restrictor 03), and Title IV (if allocated by CDE)

ESEA

Title I Part A (3010)

- Must be used to supplement the basic program
- Site employees cannot participate in administrative or clerical duties
- Intent is to provide support for low income students to become academically proficient in State Standards

Title II Part A (4035)

- to increase the academic achievement of all students by helping schools and district= improve teacher and principal quality through professional development and other activities

Title III EL (4203)

- support to ensure English learners in California, attain English proficiency,
- support so that English learners develop high levels of academic attainment in English
- support so that English learners meet the same challenging state academic standards as all other students

Local Control Funding Formula (LCFF)

- Considered State “general” funds – not categorical
- Employees funded with only LCFF do not participate in time accounting.
- Time Accounting is ONLY required if LCFF is combined with Title I, II, III, IV)

Federal Time Accounting

A requirement for the use of federal funds for salaries, time accounting certification records must be maintained and collected.

If an employee is paid with federal funds, documentation must be completed to reflect that the employee worked on that specific federal program and cost objective.

American Indian Model Schools Administrative Regulation

The following three components must be met for acceptable use of federal funds:

1. Necessary
2. Reasonable
3. Allocable (Time spent on compliant duties, proves ability to be allocated)

Types of Time Accounting:

1. Semi-Annual Fully Funded
2. Semi-Annual / Single Cost Objective
3. Personnel Activity Report (PAR) Multi-funded

TIME ACCOUNTING FORMS: SEMI-ANNUAL CERTIFICATION AND PERSONNEL ACTIVITY REPORT

SEMI-ANNUAL CERTIFICATION for EMPLOYEES FUNDED WITH 100%, ONE RESOURCE.

Title I, Part A&D	3010- Restrictor 01
Title II, Part A	4035- Restrictor 02
Title III LEP	4203- Restrictor 03

If an employee works 100% on one activity and is paid through one federal funding source only, they will sign this form twice a year, which is submitted after each six-month work period. Some examples of these employees may be instructional aides or resource teachers at one school site working on one goal area on a set schedule.

1.) January (July-December) 2.) June/July (January-June)

All duties must be supplemental and allowable under a Federal Title program.

American Indian Model Schools Administrative Regulation

If position is 100% Title I a Semi-Annual Time Accounting certification is completed twice a year.

- ✓ The Job description is embedded in the form.
- ✓ Originals are kept at the school site.
- ✓ Head of School or Administrative designee submits signed copies to Operations Department after work is completed.



Semi-Annual Certification
Activity Report for Employees Working on a Single Cost Objective
 School Year __2020-2021_____

School Site _____

Federal Program: _____ Title I _____

For the Six-Month Period of: *(Circle the completed six month time period and fill in the year)*
 January-June 20_____
 July-December 20_____

I certify that the employee listed below worked 100% of their time in the above six-month time period on activities authorized by the federal program stated above. **Include only staff fully funded through Federal Funds.*

Employee Name	Employee Title
JOB DESCRIPTION	

Employee Signature

Date

Supervisory Official's Signature

Date

This form is to be completed every six months for any employee who is paid solely with federal funds from a single cost objective.
 A school that has any staff that are split funded between Title I and another funding source must instead complete a Time and Effort Program Activity Report (PAR).

American Indian Model Schools Administrative Regulation

SEMI-ANNUAL CERTIFICATION with SCHEDULE FOR MULTI-FUNDED SITE BASED EMPLOYEES (Substitute System of Time Accounting)

If a multi-funded employee works on one goal (or cost objective), their schedule does not change, and they stay in one location, they may complete the SEMI-ANNUAL CERTIFICATION twice a year. In order to use this form, the employee MUST submit one accurate work schedule with each Semi-Annual Certification form. The schedule must include information such as time periods, grades, and subjects.



Semi-Annual Certification Activity Report for Employees Working on a Multi-Funded School Year 2020-2021

Employee Name: _____

School Site: _____ Position _____

The following descriptions should reflect alignment between the work expended on the specific federal program and funds allowed for salary

Funding Source	Resource/Restrictor	Percentage
TITLE I	3010 - Restrictor 01	
TITLE II	4035 - Restrictor 02	
TITLE III	4203 - Restrictor 03	

The percentage is populated is based on your positions current year funding

Describe the duties you perform in each program shown:

Funding Source	Resource/Restrictor	Percentage
LCFF	0000- Restrictor 0	
OTHER		

Describe the duties you perform in each program shown:

I certify that the report is an accurate statement of effort expended on the above programs and I have full knowledge of 100% of the activities. Supervisory office having firsthand knowledge of the activity performed by the employee.

Employee Signature

Date

Supervisory Official's Signature

Date

A school that has any staff that are split funded between Title I and another funding source must instead complete a Time and Effort Program Activity Report (PAR).

American Indian Model Schools Administrative Regulation

All personnel sign time accounting certifications AFTER work is performed.

All original Time Accounting forms, with original signatures must be kept at school site for five years.

Procedures to Review Federal Positions:

A review of each federal funded position will occur annually.

Each Head of School will:

1. Provide evidence of the identified need, alignment to LCAP/SPSA goals, and intent of funding for each position.
2. Submit an annual job description(Duty Statement) for each multi-funded position.
3. Submit monthly Personnel Activity Records (PAR) for each multi-funded position.

District (Operations/HR/Finance) will:

1. Review and confirm school steps 1-3.
2. Conduct a semi-annual fiscal review to determine if funds are allocated appropriately/aligned to work performed.
3. Make fiscal reconciliations if review results in misalignment.

*If school is retaining the multi-funded position for the next school year, funding must be adjusted and reflected on the Position Action Form (PAF).

REVIEW AND APPROVAL CYCLE:

Personnel Activity Report (PAR): After the last day of each month, the employee signs and submits their PAR completed, to their supervisor for review. The supervisor must date and sign the PAR after the end of the month and submit by the 10th of the following month. PARS cannot be signed or submitted after the last day of the following month.

Semi-Annual Certification: This form must be submitted in January (covering the July-December work period) and June (covering the January – June work period). In June, Semi-annuals can be signed on the last day of work for the employees' school year.

FORM SUBMISSION:

All forms must be sent either hard copy to:

American Indian Models Schools
171 12th Street
Oakland 94607
Attn: Operations Department

OR Scanned and emailed to: operations@aimsk12.org

American Indian Model Schools Administrative Regulation

EMPLOYEE TRAINING:

Time Accounting training materials and forms can be found at XXXXX. Time Accounting presentations are given in August of each year and updated throughout the year during Staff Professional Development days.

A PAR Technical Assistance workshop is given each fall. Supervisors and staff that are funded by Federal Programs will be notified prior to training and provided funding percentages.

If you have any questions on compliance or form completion, please contact ?????? Programs at Whomever@aimsk12.org.

RECONCILIATION PROCESS

Personnel Activity Report (PAR):

1. Head of Schools or designated assignee collects the PAR form from all employees that are required to complete it. The Pars is reviewed by the Head and signed before submission to the Operations Department. The department ensures that all forms are received, are complete, and provides copies to the Accounting Fiscal Services Executive Assistant.
2. The Accounting Fiscal Services Office Assistant reviews each PAR and compares it to the actual payroll expenditure ledger to confirm reported time activity agrees to the budgeted funding distribution. Managers are notified of discrepancies between resource allocation and time on calendars.
3. Operations, Fiscal Services, Heads of Schools and/or Program Coordinator meet to review any variance in excess of 10% and provide recommendations to the Superintendent
4. Operations, Fiscal Services, Human Resources Heads of Schools and Superintendent (Cabinet) meet to review, discuss, and provide course of action for discrepancies. Budget Services moves expenditures and/or updates the budget to align with the PAR per Cabinets authorization and direction.
5. Reconciliation occurs quarterly in July, October, January and April, to coincide with each budget or actuals reporting period.

Semi Annual Certification:

1. Head of Schools or designated assignee collects the Semi-Annual form from all employees that are required to complete it. The Pars is reviewed by the Head and signed before submission to the Operations Department. The Operations department ensures that all forms are received, are complete, verifies the single cost objective, and provides copies to the Accounting Fiscal Services Executive Assistant.

American Indian Model Schools Administrative Regulation

2. The Accounting Fiscal Services Executive Assistant reviews each semi-annual and compares it to the actual payroll expenditure ledger to confirm semi-annual agrees to the budgeted funding distribution. Managers are notified of discrepancies between resource allocation and time on semi-annual forms.
3. Operations, Fiscal Services, Heads of Schools and/or Program Coordinator meet to review any variance in excess of 10% and provide recommendations to the Superintendent
4. Operations, Fiscal Services, Human Resources Heads of Schools and Superintendent (Cabinet) meet to review, discuss, and provide course of action for discrepancies

Cover Sheet

Administrative Regulation 315 d: Federal Fund Management: Compliance Review Process

Section: III. Action Items
Item: E. Administrative Regulation 315 d: Federal Fund Management:
Compliance Review Process
Purpose: Vote
Submitted by:
Related Material: AR 315d Federal Fund Management Compliance Review.docx

AR 315(d) Federal Fund: Compliancy Review Process

Compliant Use of Funds:

In order to ensure the compliant use of federal Funds, the Superintendent and designee shall follow the protocols for the compliancy review process:

The Superintendent, in partnership with the Chief Business Officer, Director of Human Resources, Director of Operations and Manager of Operations compose the Compliance Review Committee to review the compliant use of designated funds and all required documentation in accordance with the Federal Guidelines.

FEDERAL FUNDS: COMPLIANCY REVIEW PROCESS

July

- **Compliance Committee:** Meet to review and align (prior year) Federal Time Accounting Records and Expenses.

August

- **Compliance Committee:** Meet to review (current year) Federal Expenses and approved programs for all schools: Identify Federally Funded Staff
- **Compliance Committee:** Provide Heads with Federal Fund Management Training
- **Compliance Committee:** Provide Federal Funded Staff with Time Accounting Training

September

- **PAR:** All multi-funded staff must submit Personnel Activity Report (August)

October

- **PAR:** All multi-funded staff must submit Personnel Activity Report (September)

November

- **PAR:** All multi-funded staff must submit Personnel Activity Report (October)
- **Compliance Committee:** Review Interim expenses with Heads of Schools to ensure alignment with program SPSA.
- **Compliance Committee:** Reviews Time Accounting submissions for accuracy

December

- **PAR :** All multi-funded staff must submit Personnel Activity Report (November)
- **Compliance Committee:** Reviews Time Accounting submissions for accuracy
- **Chief Business Officer:** Review expenses to ensure alignment with federal allocation requirements
- **Human Resources:** Circulate Communication to Heads: Semi Annual Time Accounting Submission requirements and submission date

January

- **PAR** : All multi-funded staff must submit Personnel Activity Report (December)
- **Human Resources**: Sends out Semi-Annual Reporting for Completion as outlined in AR 315(c): Federal Fund Management Time Accounting.
- **Compliance Committee**: Reviews Time Accounting submissions for accuracy

February

- **PAR** : All multi-funded staff must submit Personnel Activity Report (January)

March

- **PAR** : All multi-funded staff must submit Personnel Activity Report (February)
- Preliminary Allocation for Federal Funds are provided to Heads
- **Heads begin allocation planning**

April

- **PAR** : All multi-funded staff must submit Personnel Activity Report(March)
- **Compliance Committee**: Reviews Time Accounting submissions for accuracy
- **Head of Schools/ELD**: engage LCAP Advisory Committee (serving as the SSC) to APPROVE the proposed expenses for the next fiscal year
- **Head of Schools/ELD**: submit SPSA and Committee minutes documenting the approval of proposed expenses to Compliance Committee for review and approval
- **Compliance Committee**: reviews for compliance (If approved, continue process; If denied, revisit and resubmit)

May

- **PAR** : All multi-funded staff must submit Personnel Activity Report (April)
- **Heads of Schools/ELD**: Approved SPSA submitted for Board Approval
- Approved plans and projected budgets submitted to finance to be reflected in the Adopted Budget.
- **Human Resources**: Circulate Communication to Heads: Semi Annual Time Accounting Submission requirements and submission date
- **Compliance Committee**: meets to finalize and align information for Consolidated Application Submission.

June

- **PAR** : All multi-funded staff must submit Personnel Activity Report (May/June)
- **Human Resources**: Sends out Semi-Annual Reporting for Completion as outlined in AR 315(c): Federal Fund Management Time Accounting.
- **Chief Business Officer**: Consolidated Application completed
- **Chief Business Officer**: Adopted Budget and Consolidated Application submitted to Board for Approval
- **Chief Business Officer**: Adoption Budget Submitted to OUSD

(PAR = PERSONNEL ACTIVITY REPORT)

CE 10: Allocations and Reporting

CE 11: Allowable Use of Funds

CE 14: Local Educational Agency Administrative Charges; Time and Effort

CE 15: Local Educational Agency Equipment Inventory



American Indian
Model Schools
A School at Work!

AIPCS I & II

Downtown Oakland Campus

171 12th Street
Oakland, CA 94607

Phone: 510.893.8701
Fax: 510.893.0345
Website: aimschools.org

AIPHS

Lakeview Campus

746 Grand Avenue
Oakland, CA 94610

Phone: 510.893.8701
Fax: 510.893.0345
Website: aimschools.org

American Indian Public Charter School II

CE 15: Local Educational Agency Equipment Inventory

There are no items that were acquired that cost \$500 or more per unit that were purchased with Title I, Part A funds.



EL 02: District English Learner Advisory Committee (DELAC)

EL 03: EL Identification and Assessment

EL 04: Implement, Monitor & Revise Title III Plan

AIMS K-12 Consortium, Title III

Elementary and Secondary Education Act, Title III, Part A,
English Learner Student Program Subgrant Consortium

Memorandum of Understanding, 2020-2021 School Year

This Memorandum of Understanding represents the agreed-upon program, services and products to be provided to English learner (EL) students in American Indian Public Charter (AIMS Middle School), American Indian Public Charter School II, American Indian Public High School (AIMS High School) (Members), during the **2020-2021** school year. The American Indian Public Charter School II (AIPCS II) will act as lead local educational agency (LEA) and member. The consortium shall be named the AIMS K-12 Consortium (the Consortium).

AIPCS II will be responsible for acting as the fiscal agent for the Consortium and will file the required expenditure reports and maintain fiscal records. The Consortium will plan to expand all Title III funds during the **2020-2021** grant year. AIPCS II must continue to serve as the fiscal agent for the Consortium for the duration of the 27 months grant period and/or until all the funds are expended, after which time the California Department of Education (CDE) will bill the AIPCS II for any remaining balance.

According to the **2020-2021** California Longitudinal Pupil Achievement Data System information submitted by the Members to the CDE, the AIMS K-12 Consortium enrolled 353 EL students, which results in a subgrant amount of approximately **\$27,570**. In its role as the lead LEA, AIPCS II will support a total amount of programs, services, and products as indicated below:

Program/Service/Product	Approximate Cost	Delivery Date	Provided By
Purchase of 20 Spanish/English bilingual dictionaries and 50 bilingual dictionaries in other languages.	\$2,000	11/2020	ELD Department
Purchase of supplemental instructional materials.	\$5,000	8/17/2020	ELD Department
Costs of ELD programs and materials for after school	\$1000	8/17/2020	ELD Department
Provide professional development series regarding effective EL instructional practices to consortium teachers.	\$8,000	8/17/2020	ELD Department
ELD Consultant	\$8,570	11/2020	ELD Department
Parent engagement for ELLs in grades K-12 with a focus on culturally relevant and engaging materials and approach to learning.	\$3000	12/2020	ELD Department
Total Consortium Grant allocation	\$27,570		ELD Department

Changes regarding the provision, the scope and/or nature of these services must be made by agreement of the Members. Funds must be used before the 27 months grant period ends.

In addition to the above services and products, AIPCS II will coordinate regular meetings for the purpose of assessing the needs of the consortium.

Also, AIPCS II will be responsible for completing and submitting the Annual Report and any other reports to the CDE. Signature of each LEA representative represents the indication that the consortium has met and conferred and the Member LEAs are in agreement to all stated.

Signatures of Authorized Representatives:

Consortium Lead LEA Representative
Superintendent

Print Name: Maya Woods-Cadiz

Signature:

Date:

Consortium Member LEA Representative
Head of School

Print Name: Maurice Williams

Signature:

Date:

Consortium Member LEA Representative
Head of School

Print Name: Christopher Ahmad

Signature:

Date:

Consortium Member LEA Representative
Head of School

Print Name: Peter Holmquist

Signature:

Date:

MEMORANDUM OF UNDERSTANDING

Between
Nathalie Longree-Guevara
And
American Indian Model Schools

This Memorandum of Understanding (MOU) for professional development is entered by and between Nathalie Longree-Guevara and American Indian Model School, hereinafter referred to as AIMS.

PERIOD OF AGREEMENT

The term of this agreement shall begin on November 30, 2020 through December 31, 2020. The expectation is the work will be completed by the end of the day on December 2, 2020.

COMPENSATION

Under the terms of this agreement, AIMS shall pay an amount equal to one thousand two-hundred dollars (\$1,200) per 1 full day of services for up to 6 2/3 days of service, or \$8,000. One full day is considered 7 hours. Work may be in a full day, half day or by the hour depending on needs of AIMS and availability of both parties.

SCOPE OF WORK

Nathalie Longree-Guevara shall provide technical support related Title III compliance. Specifically, she will provide the following technical support to remediate the following corrective actions to the extent possible for 6 2/3 days and based on the prioritization and directions of AIMS.

1) EL 02: District English Learner Advisory Committee (DELAC)

Provide guidance on how to implement parent DELAC voting during distance learning. Ensure AIMS is in compliance in providing ELAC for each school site and a DELAC or combining the ELAC and DELAC for each school site.

2) EL 14: ELD

Assist in creating the following required documents:

Corrective Action 1: The charter school must develop a comprehensive description of its ELD program or programs. The program description must include all of the following information: definitive identification of the adopted ELD curriculum (or curricula) and for which grade levels it is used, a description of designated ELD program content for all grades present in the LEA (K-8) and all ELP levels, a description of how ELs are grouped, the EL authorization held by the ELD teacher, and a complete description of the role of any classified staff in the implementation of the ELD program and an identification of such staff by job title. For grades 6-8, the program document must additionally include designated ELD course descriptions which identify each designated ELD course's grade and ELP level. The program description must also address integrated ELD and the instructional strategies used in subject matter content and courses for all grade levels (K-8). To demonstrate completion of this corrective action, the charter school must provide the program document to the CDE.

Corrective Action 3: The charter school must submit the evaluation process it used to select its current ELD curriculum as well as any evaluation, supporting data or other documentation which was used. If this is not available, then charter school must conduct a comprehensive evaluation to determine the effectiveness of its current ELD program in overcoming language barriers. To demonstrate completion

of this corrective action, the charter school must provide a program evaluation either prior to, or after the implementation of, it's current ELD program.

3) EL 15: Access to Standard Instructional Program

The charter school must complete the following corrective action. The charter school must develop a formalized procedure for monitoring the academic progress of ELs in order to effectively place the students into subject matter intervention for all grade levels. The procedure must include guidelines and criteria for placement in intervention as well as criteria for exiting such intervention. To demonstrate completion of this corrective action, the charter school must provide the completed document to the CDE.

I would like guidance on what is an effective and efficient way to progress monitor our ELs and monitor our RFEPs. I mentioned we are going to use Illuminate, since we have that platform already to house our data. I need to have a formalized procedure in writing that places the students into intervention. "The procedure must include guidelines and criteria for placement in intervention as well as criteria for exiting such intervention."

4) Revise/Create/Edit Master Plan

Assist in creating/revising AIMS's Master Plan for English Learners to ensure coherence and clear procedures and processes.

5) Additional items:

Assist AIMS in providing a needs assessment or program evaluation and all supporting data which was used to determine goals and updates for the 2020-21 Title III plan.

Guidance on how to align ELD standards with ELA grade level standards middle school novel study curriculum

Guidance on ELD courses for secondary and creating an exit criteria.

Guidance on Observation, Checklist, PLC follow through after a PD training to check if strategies are being used.

Possible PD on Integrated/Designated ELD.

Nathalie Longree-Guevara Date

Vannee Chand, AIMS Date

Maya Woods Cadiz, AIMS Date

AIPCS TITLE III PLAN 2020-2021

Title III Professional Development

ESSA SECTION 3115(c)(2)

Describe how the eligible entity will provide effective professional development to classroom teachers, principals and other school leaders, administrators, and other school or community-based organizational personnel.

THIS ESSA PROVISION IS ADDRESSED BELOW:

As part of the district professional development, we will provide educators with a series of professional development focusing on both Integrated and Designated ELD, to strategically target and support academic language production and acquisition within and through ELA, Math and other core content areas. We will dive into the ELA/ELD Framework and CA ELD Standards to build comprehension and academic vocabulary acquisition in English Language Arts, word problem solving skills in Mathematics and work on reading skills in other core subjects.

AIMS K-12 College Prep School District will continue to train teachers throughout the year on effective lesson planning and effective ELD strategies using the ELA/ELD Framework and ELD/CCSS. We will also train instructional aides and ELD teachers to use the ELPAC Practice tests during instructional time to maximize student access to the ELPAC Summative test. In addition, principals, school leadership, and administrators will receive EL resources in a google drive along with teachers. Lead dept. teachers will be given the opportunity to attend training on EL strategies in their area of expertise.

Enhanced Instructional Opportunities

ESSA SECTIONS 3115(e)(1) and 3116

Describe how the eligible entity will provide enhanced instructional opportunities for immigrant children and youth.

THIS ESSA PROVISION IS ADDRESSED BELOW:

1. Place students new to the country in ELD courses to acquire English language and learn about American culture.
2. Provide additional support for students new to the country by using supplemental materials and provide daily instruction in integrated and designated ELD; utilizing instructional aide to decrease group size while ELD teacher or general ed. Teachers provide designated ELD.
3. Provide sufficient aligned intervention materials, support and training for targeted populations and areas of needed growth.
4. Provide training to instructional aides to further differentiate instruction by focus on support in basic/survival vocabulary, school routines, study skills, support for acclimating to U.S schools.

Title III Programs and Activities

ESSA SECTION 3116(b)(1)

Describe the effective programs and activities, including language instruction educational programs, proposed to be developed, implemented, and administered under the subgrant that will help English learners increase their English language proficiency and meet the challenging State academic standards.

The district conducted a feedback survey to determine the effectiveness of the ELD program. In 2020-2021, the district adjusted the ELD program to improve the quality of instruction, implementation, etc. They include: 1) Provided teachers with newcomers toolkit and EL strategies. 2) The general ed teacher or ELD teacher will deliver designated ELD instruction for a daily, 20-30minute period; 3) Designated ELD materials will be from Dataworks and Benchmark Advance; district-adopted English Language Arts/English Language Development curriculum will be used during Designated ELD; 4) Instructional aide will continue to provide push-in/pull-out intervention instructions; 5) EL progress will be monitored frequently throughout the year, this will drive intervention instruction and progress reports are given to parents along with information on EL progress; 6) We will continue to utilize the multiple assessments housed in our database system and spreadsheet to identify students' specific needs, respond instructionally, and monitor progress. 7) Additional support is given during ELD after-school where homework support is provided and language programs will be available. 8) ELD Professional Development in Integrated and Designated happens every couple of months to increase teacher's practice in ELD.

To ensure English proficiency and academic achievement classroom teachers and/or ELD teachers represent the majority in providing daily, 20-30-minute designated ELD instruction and Integrated ELD to English learners. We will continue to have instructional aides instruct small student groups with targeted, high quality language instruction. All EL students will receive Designated ELD services on a daily basis. We assess English Learners, annually and initially, using the ELPAC. In addition to the ELPAC, we monitor all students, including ELs, through a benchmark and progress monitoring system. Our site based teams support a continual procedure of data analysis to respond instructionally as students' progress. Our instructional aides have access to student progress data in order to customize small group instruction, supplemental to core instruction, that addresses students' needs in the areas of meaning, language, content, expression, and foundational skills.

English Proficiency and Academic Achievement

ESSA SECTION 3116(b)(2)(A-B)

Describe how the eligible entity will ensure that elementary schools and secondary schools receiving funds under Subpart 1 assist English learners in:

- (A) achieving English proficiency based on the State's English language proficiency assessment under Section 1111(b)(2)(G), consistent with the State's long-term goals, as described in Section 1111(c)(4)(A)(ii); and
- (B) meeting the challenging State academic standards.

THIS ESSA PROVISION IS ADDRESSED BELOW:

1. Provide supplemental, aligned intervention materials, support and training for targeted populations and areas of needed growth.
2. Continue daily designated ELD courses supported by ELD teachers to enhance and develop immigrants' knowledge on American Civics.
3. Instructional aide provides additional personnel to reduce group size, intensify instruction in basic skills for specially identified students, and increase the frequency of instruction that would otherwise not be met by the classroom teacher alone.
3. Continue to provide teacher professional development on Integrated ELD and Designated ELD research-based best practices for Language Arts, Math and other core subjects.

4. Continue to provide curricular materials that address Designated and Integrated ELD, designed to target the needs of English Learners according to their language proficiency.

EL 07: Supplement, Not Supplant with Title III



American Indian Model Schools

ELD Coordinator

DESCRIPTION

Under the direction of the Superintendent or designee, the Coordinator serves as an educational leader of the school. The ELD Coordinator is accountable to the Superintendent or designee for the quality of teaching, curriculum, instruction, postsecondary preparation, and the achievement of students.

ESSENTIAL DUTIES AND RESPONSIBILITIES

- Assists school administrators for the purpose of supporting them in meeting the needs of English Language Learners.
- Conducts meetings with staff for the purpose of coordinating districtwide activities including disseminating and receiving information, planning and implementing activities/events, addressing operational issues, etc.
- Confers with staff as may be appropriate regarding instructional techniques, organization of practices, etc. for the purpose of providing guidance and mentoring.
- Coordinates a variety of administrative activities (e.g. screening, interviewing, recommending, and/or orienting program staff; etc.) for the purpose of ensuring a positive learning environment and the efficient use of resources within the specified program area.
- Coordinates language proficiency testing (e.g. LPAC) for the purpose of identifying students that qualify for English Language Development programs.
- Identifies program needs (e.g. instructional materials and equipment, etc.) for the purpose of providing input to school administration that will enhance the ELD program.
- Monitors District and Site level advisory committees (e.g. DELAC, ELAC) for the purpose of ensuring compliance and obtaining input to maximize program effectiveness.
- Monitors inventory of instructional materials, equipment and supplies for the purpose of identifying required items to provide instruction in accordance with established curriculum.
- Participates in meetings, workshops, trainings, and seminars (e.g. site management team, specialized staff, district curriculum, etc.) for the purpose of conveying and/or gathering information required to perform functions.
- Prepares a variety of reports and written materials (e.g. District ELD plan, benchmark objectives, supply orders, equipment inventory, etc.) for the purpose of documenting activities and ensuring compliance with established guidelines.
- Recommends budget expenditures for the purpose of addressing curricular, equipment and supply needs required to implement the instructional program.
- Researches new material and recommends pilot projects for the purpose of providing the most effective program for the students.
- Responds to inquiries from school personnel for the purpose of providing information, assistance and/or direction related to the grade level or special area activities.

EDUCATION AND EXPERIENCE

- Masters' Degree in educational related field
- Possesses or eligible for Administrative Services Credential (desired)
- Minimum 3 years of successful teaching

QUALIFICATIONS

- 3 letters of recommendation (1 from a direct supervisor)
- Demonstrated observation and coaching ability in classroom

This is an exempt position. The incumbent is not eligible for overtime compensation. The Board of Directors reserves the right to waive any minimum qualification.

(Pending AIMS Board Approval)

EL 08: Time and Effort Requirements (Title I and Title III)

EL 10: Reclassification



Reclassification Criteria

Reclassification is the process that determines whether an English learner should be reclassified as Fluent English Proficient (RFEP). Reclassification relies on evidence demonstrating that the student has achieved a level of English proficiency comparable to that of average native speakers of English. Reclassification policies and procedures are aligned with California Department of Education guidelines. Multiple criteria are utilized to establish that the student is ready to be reclassified:

1. English language proficiency on the ELPAC- Well Developed (4)
2. Comparison of the performance in basic skills against the performance of English proficient students of the same age, which demonstrates whether the student is sufficiently proficient in English to participate effectively in a curriculum designed for students of the same age whose native language is English.
3. Teacher evaluation of a student's academic English skills and abilities.
4. Parent/guardian opinion and consultation in a discussion about their child's English language proficiency and meeting the guidelines for reclassification.

Once all information is documented, the student's status is changed to "RFEP", and the school is provided with documentation for the teacher and a copy is filed in the student's cumulative file. Students who do not meet all criteria remain classified as "EL" (English learner).

Under current state law, identified students who are English learners must participate in the annual administration of the ELPAC until they are Reclassified Fluent English Proficient (RFEP).

English Learner Reclassification Criteria for K-12: 2020-2021

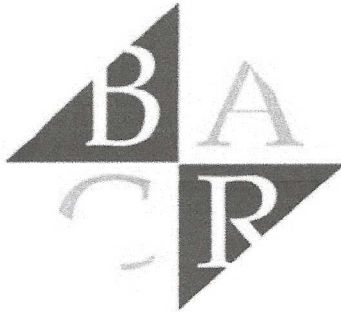
Grade	1. PROFICIENCY ON ENGLISH ASSESSMENT (ELPAC)	2. STUDENT PERFORMANCE IN BASIC SKILLS		3. TEACHER EVALUATION	4. PARENT EVALUATION
		Assessment	Required Score		
K-2	Overall ELPAC proficiency level of 4 (Bridging) Kinder: 1474-1700 1st: 1507-1700 2nd: 1532-1700	Reading Inventory	K-Proficient or higher 1 st -190 and above 2 nd -420 and above	Student will qualify on the teacher evaluation criterion based on performance level marks: K-1 st Meet Standard (3) or Exceed Standard (4) in English Language Arts 2 nd - Average of C or higher in English Language Arts on Standards-Based Report Card	Parent must also agree to reclassification. Parents can request for conference.
3-5	Overall ELPAC proficiency level of 4 (Bridging) 3rd: 1535-1800 4th: 1549-1800 5th: 1560-1800	Reading Inventory OR Smarter Balanced Assessment: ELA	3 rd -520 and above 4 th -740 and above 5 th - 830 and above Level 3 Standards Met or 4 Standards Exceeded	Student will qualify on the teacher evaluation criterion based on grades: <input checked="" type="checkbox"/> Average of C or higher in English Language Arts on Standards-Based Report Card	Parent must also agree to reclassification. Parents can request for conference.
6-8	Overall ELPAC proficiency level of 4 (Bridging) 6th: 1567-1900 7th: 1576-1900 8th: 1590-1900	Reading Inventory OR Smarter Balanced Assessment: ELA	6 th -925 and above 7 th -970 and above 8 th - 1010 and above Level 3 Standards Met or 4 Standards Exceeded	Student will qualify on the teacher evaluation criterion based on grades: <input checked="" type="checkbox"/> Report card grade of C or higher in English Language Arts or English Language Development	Parent must also agree to reclassification. Parents can request for conference.
9-12	Overall ELPAC proficiency level of 4 (Bridging) 9th-10th: 1606-1950 11th-12th: 1615-1950	Reading Inventory OR Smarter Balanced Assessment: ELA OR ELA Benchmark	9 th -12 th 1050 and above Level 3 Standards Met or 4 Standards Exceeded Proficient or higher	Student will qualify on the teacher evaluation criterion based on grades: <input checked="" type="checkbox"/> Report card grade of C or higher in English Language Arts or English Language Development	Parent must also agree to reclassification. Parents can request for conference.

EL 11: Teacher EL Authorization

EL 14: ELD

EL 15: Access to Standard Instructional Program

EXLP 09: Funding Direct Services to Pupils (AIPCS II)



Bay Area Community Resources
171 Carlos Drive
San Rafael, CA 94903

To:
 American Indian Model Schools
 171 12th Street
 Oakland, CA 94607

Invoice Date August 1, 2019

Attn: Marisol Magana

Pay to: Bay Area Community Resources			
Address: 171 Carlos Drive, San Rafael, CA 94903		Contact Person:	Marisa Ramirez
Phone:	510/559-3025	Title:	Program Director
Fax:	510/559-3030	Billing Period:	Jul 2019
School Site	American Indian Public Charter School II	Invoice	2007406

Per the agreement between American Indian Model Schools (AIMS) and Bay Area Community Resources (BACR)
 a sub-contractor, for the purposes of providing an after-school program aligned
 with the School's School Day, Program Quality, and Fiscal Oversight during the 2019-2020 School Year.

The total contract amount for the 19-20 ASES is \$177,382.00

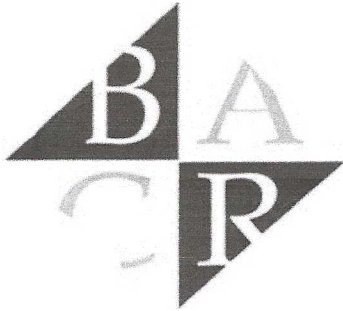
Description of Services Performed

Invoice Amount for Contract:	Amount
ASES - July 2019	\$787.30
Admin @ 15% Total Expense	\$118.10
Total Due	\$905.40

/

American Indian Model Schools Admin Signature / Date

Please Remit payment to: Bay Area Community Resources, 171 Carlos Drive, SR, CA 94903 Attn: Laurie Ziemer - Project Accountant



Bay Area Community Resources
 171 Carlos Drive
 San Rafael, CA 94903

To:
 American Indian Model Schools
 171 12th Street
 Oakland, CA 94607

Invoice Date September 1, 2019

Attn: Marisol Magana

Pay to: Bay Area Community Resources			
Address: 171 Carlos Drive, San Rafael, CA 94903		Contact Person:	Marisa Ramirez
Phone:	510/559-3025	Title:	Program Director
Fax:	510/559-3030	Billing Period:	Aug 2019
School Site	American Indian Public Charter School II	Invoice	2008406

Per the agreement between American Indian Model Schools (AIMS) and Bay Area Community Resources (BACR)
 a sub-contractor, for the purposes of providing an after-school program aligned
 with the School's School Day, Program Quality, and Fiscal Oversight during the 2019-2020 School Year.

The total contract amount for the 19-20 ASES is \$177,382.00

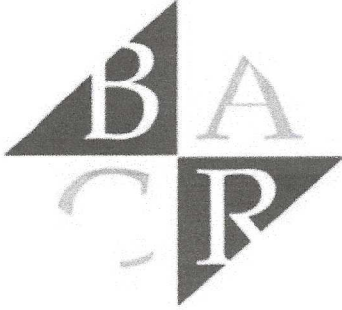
Description of Services Performed

Invoice Amount for Contract:	Amount
ASES - Aug 2019	\$1,776.00
Admin @ 15% Total Expense	\$266.40
Total Due	\$2,042.40

/

American Indian Model Schools Admin Signature / Date

Please Remit payment to: Bay Area Community Resources, 171 Carlos Drive, SR, CA 94903
Attn: Laurie Ziemer - Project Accountant



Bay Area Community Resources
 171 Carlos Drive
 San Rafael, CA 94903

To:
 American Indian Model Schools
 171 12th Street
 Oakland, CA 94607

Invoice Date October 1, 2019

Attn: Marisol Magana

Pay to: Bay Area Community Resources			
Address: 171 Carlos Drive, San Rafael, CA 94903		Contact Person:	Marisa Ramirez
Phone:	510/559-3025	Title:	Program Director
Fax:	510/559-3030	Billing Period:	Sep 2019
School Site	American Indian Public Charter School II	Invoice	2009406

Per the agreement between American Indian Model Schools (AIMS) and Bay Area Community Resources (BACR)
 a sub-contractor, for the purposes of providing an after-school program aligned
 with the School's School Day, Program Quality, and Fiscal Oversight during the 2019-2020 School Year.

The total contract amount for the 19-20 ASES is \$177,382.00

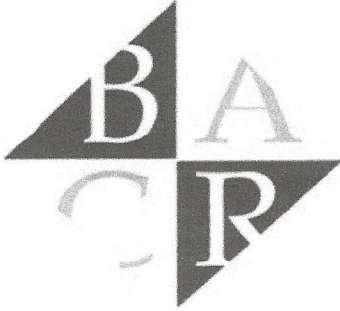
Description of Services Performed

Invoice Amount for Contract:	Amount
ASES - Sep 2019	\$4,478.91
Admin @ 15% Total Expense	\$671.84
Total Due	\$5,150.75

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American Indian Model Schools Admin Signature / Date

Please Remit payment to: Bay Area Community Resources, 171 Carlos Drive, SR, CA 94903
Attn: Laurie Ziemer - Project Accountant



Bay Area Community Resources
 171 Carlos Drive
 San Rafael, CA 94903

To:
 American Indian Model Schools
 171 12th Street
 Oakland, CA 94607

Invoice Date November 1, 2019

Attn: Marisol Magana

Pay to: Bay Area Community Resources			
Address: 171 Carlos Drive, San Rafael, CA 94903		Contact Person:	Marisa Ramirez
Phone:	510/559-3025	Title:	Program Director
Fax:	510/559-3030	Billing Period:	Oct 2019
School Site	American Indian Public Charter School II	Invoice	2010406

Per the agreement between American Indian Model Schools (AIMS) and Bay Area Community Resources (BACR) a sub-contractor, for the purposes of providing an after-school program aligned with the School's School Day, Program Quality, and Fiscal Oversight during the 2019-2020 School Year.

The total contract amount for the 19-20 ASES is \$177,382.00

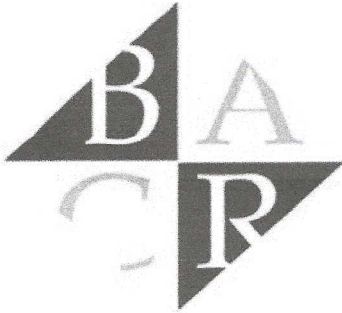
Description of Services Performed

Invoice Amount for Contract:	Amount
ASES - Oct 2019	\$8,346.46
Admin @ 15% Total Expense	\$1,251.97
Total Due	\$9,598.43

/

American Indian Model Schools Admin Signature / Date

Please Remit payment to: Bay Area Community Resources, 171 Carlos Drive, SR, CA 94903 Attn: Laurie Ziemer - Project Accountant



Bay Area Community Resources
171 Carlos Drive
San Rafael, CA 94903

To:
 American Indian Model Schools
 171 12th Street
 Oakland, CA 94607

Invoice Date **December 1, 2019**

Attn: Marisol Magana

Pay to: Bay Area Community Resources			
Address: 171 Carlos Drive, San Rafael, CA 94903		Contact Person:	Marisa Ramirez
Phone:	510/559-3025	Title:	Program Director
Fax:	510/559-3030	Billing Period:	Nov 2019
School Site	American Indian Public Charter School II	Invoice	2011406

Per the agreement between American Indian Model Schools (AIMS) and Bay Area Community Resources (BACR)
 a sub-contractor, for the purposes of providing an after-school program aligned
 with the School's School Day, Program Quality, and Fiscal Oversight during the 2019-2020 School Year.

The total contract amount for the 19-20 ASES is \$177,382.00

Description of Services Performed

Invoice Amount for Contract:	Amount
ASES - Nov 2019	\$12,681.68
Admin @ 15% Total Expense	\$1,902.25
Total Due	\$14,583.93

/

American Indian Model Schools Admin Signature / Date

Please Remit payment to: Bay Area Community Resources, 171 Carlos Drive, SR, CA 94903
Attn: Laurie Ziemer - Project Accountant



Bay Area Community Resources
171 Carlos Drive
San Rafael, CA 94903

To:
 American Indian Model Schools
 171 12th Street
 Oakland, CA 94607

Invoice Date January 1, 2020

Attn: Marisol Magana

Pay to: Bay Area Community Resources			
Address: 171 Carlos Drive, San Rafael, CA 94903		Contact Person:	Marisa Ramirez
Phone:	510/559-3025	Title:	Program Director
Fax:	510/559-3030	Billing Period:	Dec 2019
School Site	American Indian Public Charter School II	Invoice	2012406

Per the agreement between American Indian Model Schools (AIMS) and Bay Area Community Resources (BACR) a sub-contractor, for the purposes of providing an after-school program aligned with the School's School Day, Program Quality, and Fiscal Oversight during the 2019-2020 School Year.

The total contract amount for the 19-20 ASES is \$177,382.00

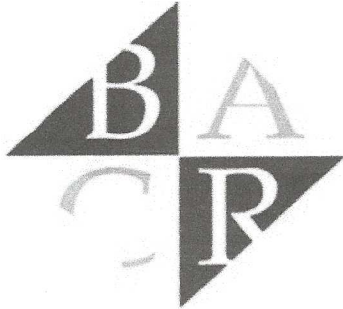
Description of Services Performed

Invoice Amount for Contract:	Amount
ASES - Dec 2019	\$14,468.00
Admin @ 15% Total Expense	\$2,170.20
Total Due	\$16,638.20

/

American Indian Model Schools Admin Signature / Date

Please Remit payment to: Bay Area Community Resources, 171 Carlos Drive, SR, CA 94903
Attn: Laurie Ziemer - Project Accountant



Bay Area Community Resources
 171 Carlos Drive
 San Rafael, CA 94903

To:
 American Indian Model Schools
 171 12th Street
 Oakland, CA 94607

Invoice Date February 1, 2020

Attn: Marisol Magana

Pay to: Bay Area Community Resources			
Address: 171 Carlos Drive, San Rafael, CA 94903		Contact Person:	Marisa Ramirez
Phone:	510/559-3025	Title:	Program Director
Fax:	510/559-3030	Billing Period:	Jan 2020
School Site	American Indian Public Charter School II	Invoice	2001406

Per the agreement between American Indian Model Schools (AIMS) and Bay Area Community Resources (BACR) a sub-contractor, for the purposes of providing an after-school program aligned with the School's School Day, Program Quality, and Fiscal Oversight during the 2019-2020 School Year.

The total contract amount for the 19-20 ASES is \$177,382.00

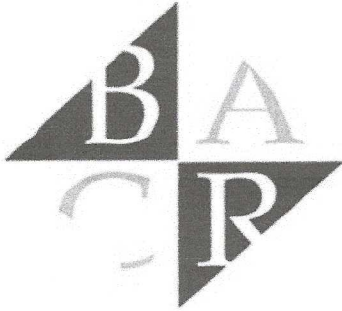
Description of Services Performed

	Amount
Invoice Amount for Contract:	
ASES - Jan 2020	\$13,730.23
Admin @ 15% Total Expense	\$2,059.53
Total Due	\$15,789.76

/

American Indian Model Schools Admin Signature / Date

Please Remit payment to: Bay Area Community Resources, 171 Carlos Drive, SR, CA 94903
 Attn: Laurie Ziemer - Project Accountant



Bay Area Community Resources
171 Carlos Drive
San Rafael, CA 94903

To:
 American Indian Model Schools
 171 12th Street
 Oakland, CA 94607

Invoice Date **March 1, 2020**

Attn: Marisol Magana

Pay to: Bay Area Community Resources			
Address: 171 Carlos Drive, San Rafael, CA 94903		Contact Person:	Marisa Ramirez
Phone:	510/559-3025	Title:	Program Director
Fax:	510/559-3030	Billing Period:	Feb 2020
School Site	American Indian Public Charter School II	Invoice	2002406

Per the agreement between American Indian Model Schools (AIMS) and Bay Area Community Resources (BACR) a sub-contractor, for the purposes of providing an after-school program aligned with the School's School Day, Program Quality, and Fiscal Oversight during the 2019-2020 School Year.

The total contract amount for the 19-20 ASES is \$177,382.00

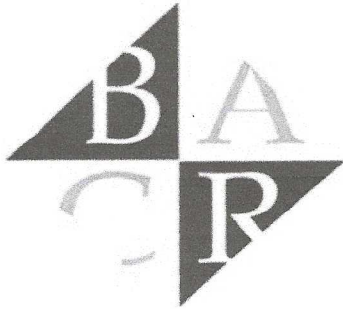
Description of Services Performed

Invoice Amount for Contract:	Amount
ASES - Feb 2020	\$24,978.91
Admin @ 15% Total Expense	\$3,746.84
Total Due	\$28,725.75

/

American Indian Model Schools Admin Signature / Date

Please Remit payment to: Bay Area Community Resources, 171 Carlos Drive, SR, CA 94903
Attn: Laurie Ziemer - Project Accountant



Bay Area Community Resources
 171 Carlos Drive
 San Rafael, CA 94903

To:
 American Indian Model Schools
 171 12th Street
 Oakland, CA 94607

Invoice Date April 1, 2020

Attn: Marisol Magana

Pay to: Bay Area Community Resources			
Address: 171 Carlos Drive, San Rafael, CA 94903		Contact Person:	Marisa Ramirez
Phone:	510/559-3025	Title:	Program Director
Fax:	510/559-3030	Billing Period:	Mar 2020
School Site	American Indian Public Charter School II	Invoice	2003406

Per the agreement between American Indian Model Schools (AIMS) and Bay Area Community Resources (BACR) a sub-contractor, for the purposes of providing an after-school program aligned with the School's School Day, Program Quality, and Fiscal Oversight during the 2019-2020 School Year.

The total contract amount for the 19-20 ASES is \$177,382.00

Description of Services Performed

	Amount
Invoice Amount for Contract:	
ASES - Mar 2020	\$13,216.15
Admin @ 15% Total Expense	\$1,982.42
Total Due	\$15,198.57

/

American Indian Model Schools Admin Signature / Date

Please Remit payment to: Bay Area Community Resources, 171 Carlos Drive, SR, CA 94903
Attn: Laurie Ziemer - Project Accountant



Bay Area Community Resources
 171 Carlos Drive
 San Rafael, CA 94903

To:
 American Indian Model Schools
 171 12th Street
 Oakland, CA 94607

Invoice Date May 1, 2020

Attn: Marisol Magana

Pay to: Bay Area Community Resources			
Address: 171 Carlos Drive, San Rafael, CA 94903		Contact Person:	Marisa Ramirez
Phone:	510/559-3025	Title:	Program Director
Fax:	510/559-3030	Billing Period:	Apr 2020
School Site	American Indian Public Charter School II	Invoice	2004406

Per the agreement between American Indian Model Schools (AIMS) and Bay Area Community Resources (BACR) a sub-contractor, for the purposes of providing an after-school program aligned with the School's School Day, Program Quality, and Fiscal Oversight during the 2019-2020 School Year.

The total contract amount for the 19-20 ASES is \$177,382.00

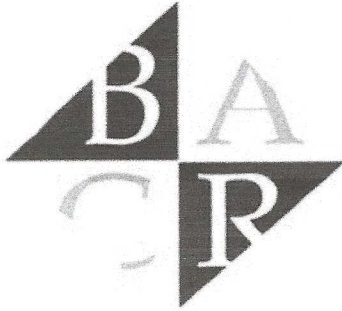
Description of Services Performed

	Amount
Invoice Amount for Contract:	
ASES - Apr 2020	\$14,872.06
Admin @ 15% Total Expense	\$2,230.81
Total Due	\$17,102.87

/

American Indian Model Schools Admin Signature / Date

Please Remit payment to: Bay Area Community Resources, 171 Carlos Drive, SR, CA 94903
Attn: Laurie Ziemer - Project Accountant



Bay Area Community Resources
 171 Carlos Drive
 San Rafael, CA 94903

To:
 American Indian Model Schools
 171 12th Street
 Oakland, CA 94607

Invoice Date June 1, 2020

Attn: Marisol Magana

Pay to: Bay Area Community Resources			
Address: 171 Carlos Drive, San Rafael, CA 94903		Contact Person:	Marisa Ramirez
Phone:	510/559-3025	Title:	Program Director
Fax:	510/559-3030	Billing Period:	May 2020
School Site	American Indian Public Charter School II	Invoice	2005406

Per the agreement between American Indian Model Schools (AIMS) and Bay Area Community Resources (BACR) a sub-contractor, for the purposes of providing an after-school program aligned with the School's School Day, Program Quality, and Fiscal Oversight during the 2019-2020 School Year.

The total contract amount for the 19-20 ASES is \$177,382.00

Description of Services Performed

	Amount
Invoice Amount for Contract:	
ASES - May 2020	\$19,823.51
Admin @ 15% Total Expense	\$2,973.53
Total Due	\$22,797.04

/

American Indian Model Schools Admin Signature / Date

Please Remit payment to: Bay Area Community Resources, 171 Carlos Drive, SR, CA 94903 Attn: Laurie Ziemer - Project Accountant



Bay Area Community Resources
 171 Carlos Drive
 San Rafael, CA 94903

To:
 American Indian Model Schools
 171 12th Street
 Oakland, CA 94607

Invoice Date July 1, 2020

Attn: Marisol Magana

Pay to: Bay Area Community Resources			
Address: 171 Carlos Drive, San Rafael, CA 94903		Contact Person:	Marisa Ramirez
Phone:	510/559-3025	Title:	Program Director
Fax:	510/559-3030	Billing Period:	Jun 2020
School Site	American Indian Public Charter School II	Invoice	2006406

Per the agreement between American Indian Model Schools (AIMS) and Bay Area Community Resources (BACR) a sub-contractor, for the purposes of providing an after-school program aligned with the School's School Day, Program Quality, and Fiscal Oversight during the 2019-2020 School Year.

The total contract amount for the 19-20 ASES is \$177,382.00

Description of Services Performed

	Amount
Invoice Amount for Contract:	
ASES - Jun 2020	\$25,086.01
Admin @ 15% Total Expense	\$3,762.90
Total Due	\$28,848.91

/

American Indian Model Schools Admin Signature / Date

Please Remit payment to: Bay Area Community Resources, 171 Carlos Drive, SR, CA 94903
 Attn: Laurie Ziemer - Project Accountant

EXLP 10: Local Contribution of Cash or In-Kind (AIPCS II)

American Indian Public Charter School II 2020-2021 FPM Review

EXLP 10: Matching Funds

Updated: 11/24/2020

Matching Funds Calculator	Enter your total grant award here=>:	\$ 177,382
Grantee:	<u>American Indian Public Charter School II</u>	Required Match
School site	<u>American Indian Public Charter School II</u>	Max Facilities (25% of Required match)
		\$ 58,536
		\$ 14,634

Source (Organization)	Item	Cost Basis for each unit/rationale (Board rental policy; FTE;	Base (what is the base cost e.g. total salary plus benefits of a person; cost per day of a room(s), etc.	Base Description for Column D	Number of units	Unit Description	Units (days, weeks, etc.)	Description of calculation	Total In-kind	Total funds
AIPCS II	Head of School time	Salary schedule	\$ 61.00	per hour	1	hours per week	20	weeks	\$ 1,220.00	
AIPCS II	Head of School time	Salary schedule	\$ 61.00	per hour	1	hours per week	20	weeks	\$ 1,220.00	
AIPCS II	Superintendent time	Salary schedule	\$ 86.00	per hour	1	hours per week	20	weeks	\$ 1,720.00	
AIPCS II	Chief Business Officer time	Salary schedule	\$ 60.00	per hour	1	hours per week	20	weeks	\$ 1,200.00	
AIPCS II	Operations Director time	Salary schedule	\$ 48.00	per hour	1	hours per week	20	weeks	\$ 960.00	
AIPCS II	Operations Manager time	Salary schedule	\$ 45.00	per hour	1	hours per week	20	weeks	\$ 900.00	
AIPCS II	Dean of Students Time	Salary schedule	\$ 50.00	per hour	1	hours per week	20	weeks	\$ 1,000.00	
AIPCS II	Administrative Assistant Time	Salary schedule	\$ 30.00	per hour	5	hours per week	20	weeks	\$ 3,000.00	
AIPCS II	Room/space	Rental procedure	\$ 38.00	per day	6	rooms per day	96	days	\$ 14,634.02	\$ 21,888.00
AIPCS II	Custodial Staffing	Hourly rate	\$ 22.50	per hour	10	hours per week	20	weeks	\$ 4,500.00	
AIPCS	Cleaning Supplies	Weekly rate	\$ 200.00	per week	1	per week	20	weeks	\$ 4,000.00	
AIPCS	School site contribution	Yearly Contribution	\$ 20,000.00	Per year	1	year	1	Year	\$ 20,000.00	
Snack Program	Snack Program	Yearly fee		Per year	1	year	1	Year	\$ 4,182.05	\$19,038
			\$ -		0				\$ -	
			\$ -		0				\$ -	

Total: \$ 58,536.07
Over/under match: \$ 0.00

EXLP 11: Supplement not Supplant (AIPCS II)

American Indian Public Charter School II
2020-21 FPM Review

EXLP 09: Budget Worksheet 85-15 Summary Worksheet

Fiscal Year: (FY 2019-20 data)

LEA/Agency: American Indian Public Charter School II

Please total all charges to ASES and/or 21st Century/ASSETS grant

Total Q1-Q4		Amount - Direct	Amount - Admin	% of time	Amount - Total
Series 1000	Teacher Salaries	\$0.00	\$0.00		\$0.00
	Certificated Personnel Salaries	\$0.00	\$0.00		\$0.00
Series 2000	Site Coordinator	\$18,782.47	\$2,817.37		\$21,599.84
	Program Leaders	\$10,240.92	\$1,536.14		\$11,777.06
	Other Program Staff (Assistant Site Coordinator, Site Assistant, etc.)	\$83,348.63	\$12,502.29		\$95,850.92
	Quality Assurance Coach - allocated portion of Full Time position	\$0.00	\$0.00		\$0.00
	Regional GM - allocated portion of Full Time position	\$0.00	\$0.00		\$0.00
	Classified Personnel Salaries	\$112,372.02	\$16,855.80		\$129,227.82
Series 3000	Site Coordinator - Payroll Taxes and Workers' Comp Insurance	\$0.00	\$0.00		\$0.00
	Program Leaders - Payroll Taxes and Workers' Comp Insurance	\$0.00	\$0.00		\$0.00
	Other Program Staff - Payroll Taxes and Workers' Comp Insurance	\$0.00	\$0.00		\$0.00
	Quality Assurance Coach - Payroll Taxes and Workers' Comp Insurance	\$0.00	\$0.00		\$0.00
	Regional GM - Employee Insurance Benefit	\$0.00	\$0.00		\$0.00
	Site Coordinator - Employee Insurance Benefit	\$4,695.62	\$704.34		\$5,399.96
	Program Leaders - Employee Insurance Benefit	\$2,560.23	\$384.03		\$2,944.26
	Other Program Staff - Employee Insurance Benefit	\$20,837.06	\$3,125.56		\$23,962.62
	Quality Assurance Coach - Employee Insurance Benefit	\$0.00	\$0.00		\$0.00
	Regional GM - Employee Insurance Benefit	\$0.00	\$0.00		\$0.00
Series 4000	Employee Benefits	\$28,092.91	\$4,213.93		\$32,306.84
	Classroom Supplies - Including start up, curriculum, safety and other monthly consumable expenses	\$2,508.04	\$376.21		\$2,884.25
Series 5000	Books & Supplies	\$2,508.04	\$376.21		\$2,884.25
	Student Data Information System and other software licensing costs	\$0.00	\$0.00		\$0.00
	Mileage	\$0.00	\$0.00		\$0.00
	Walkie Talkies	\$0.00	\$0.00		\$0.00
	Contingency	\$0.00	\$0.00		\$0.00
	Shirts & Uniforms	\$0.00	\$0.00		\$0.00
	Other expenses	\$0.00	\$0.00		\$0.00
	Other consumables	\$0.00	\$0.00		\$0.00
	Other program costs	\$0.00	\$0.00		\$0.00
	Contracts (only the first \$25,000 per contract)	\$0.00	\$0.00		\$0.00
	Insurance	\$0.00	\$0.00		\$0.00
	Interest	\$0.00	\$0.00		\$0.00
	Payroll processing	\$0.00	\$0.00		\$0.00
	Other allocated costs	\$2,782.25	\$417.34		\$3,199.59
Services & Other Operating Expenses	\$2,782.25	\$417.34		\$3,199.59	
Sub Total		\$145,755.22	\$21,863.28		\$167,618.50
	Percentage spent of grant amount	82%	12%		94%
Series 7000	Indirect Cost Percentage (Sub total*ICR-5% as an example)		\$0.00		\$0.00
			\$0.00		\$0.00
Series 5100		\$0.00	\$0.00		\$0.00
	Does not calculate indirect	\$0.00	\$0.00		\$0.00
	Subcontracts and Agreements	\$8,490.00	\$1,273.50		\$9,763.50
Total Expenses		\$154,245.22	\$23,136.78		\$177,382.00
	Percentage spent of grant amount	87%	13%		100%
Grant amount	\$177,382				

At least 85% for direct services and no more than 15 % for administrative services

NOTE This is for the LEA. If there are no subcontracts for services, this suffices as the Grantee total.

EXLP 16: Staff Minimum Qualifications (AIPCS II)

AIPCS- Federal Program Monitoring 2020-2021 Notification of Findings



**California Department of Education
Federal Program Monitoring 2020-21
Notification of Findings**

October 22, 2020

This is the official Notification of Findings (NOF) report of the review visit conducted by the California Department of Education (CDE). Because the methodology of the review involves sampling, it is not an assessment of all legal requirements. Nevertheless, the local educational agency (LEA) is responsible for operating its federal categorical programs in compliance with all applicable laws and regulations.

Local Educational Agency: American Indian Public Charter (01612596113807)
Review Date(s): 10/21/2020 - 10/23/2020
Regional Team Leader(s): Arik Rub, 916-319-0953
FPM Coordinator(s): Marisol Magana, 510-893-8701 Ext. 13
 Tiffany Tung, 510-893-8701 Ext. 23
 Marisol Magana, 510-220-9985

Program Reviewed	Program Reviewer	Total Findings
Expanded Learning Programs (EXLP)	Iqbal Badwalz	4

The LEA is required to resolve each Federal Program Monitoring (FPM) finding within 45 calendar days which ends on 12/07/2020. Corrective actions made to resolve findings must be implemented at all sites in the LEA and the new procedures must be used in the future.

When a FPM finding cannot be resolved within this 45 calendar day period, the LEA submits a resolution agreement request using the "Resolution Agreement" process via CMT. Authorized LEA staff may request suggestions from CDE staff on the resolution of findings.

NOTE: Copies of this report were distributed to the Agency. This is a public report and must be made available upon request. (California Public Records Act, Government Code section 6250)

Sites Reviewed	Programs Reviewed
No sites included in this review.	

Monitoring Results by Program

Expanded Learning Programs

- EXLP 09: Funding Direct Services to Pupils

LEA allocates no less than 85 percent of total grant amount to the school site for direct services to pupils. The agency spends no more than 15 percent of the amount of the grant for administrative costs, which includes any indirect costs.



Notification of Findings

American Indian Public Charter (01612596113807)

After reviewing documentation submitted by American Indian Public Charter (AIPC), there was insufficient evidence to substantiate if the agency allocates no less than 85 percent of total grant amount to the school site for direct services to pupils and spends no more than 15 percent of the amount of the grant for administrative costs, which includes any indirect costs.

AIPC must submit documentation, financial activity reports, Bay Area Community Resources (BACR) invoices processed by the agency for payments that shows at least 85 percent of expenditures at BACR were for direct services to students and no more than 15 percent is spent on administrative costs, which includes any indirect costs. The agency must also submit documentation in the CMT to show how any fee charged to students parents is expended.

2. EXLP 10: Local Contribution of Cash or In-Kind

LEAs operating an After School Education & Safety Program (ASES) program obtains a local contribution of cash or in-kind local funds equal to not less than one-third of the total grant amount. Facilities or space usage may fulfill not more than 25 percent of the required local match.

After reviewing documentation submitted by AIPC, there was insufficient evidence to substantiate that the agency obtains a local contribution of cash or in-kind local funds equal to not less than one-third of the total grant amount.

AIPC must submit to the CMT documentation, financial activity reports, including a description of the expenditure, date, vendor, and resource code to demonstrate that the agency obtains a local contribution of cash or in-kind local funds equal to not less than one-third of the total grant amount.

3. EXLP 11: Supplement not Supplant

LEAs use categorical funds only to supplement, and not supplant, state and local funds.

After reviewing documentation submitted by AIPC, there was insufficient evidence to substantiate whether the agency uses categorical funds only to supplement, and not supplant, state and local funds.

AIPC must submit to the CMT documentation, financial activity reports, including a description of the expenditure, date, vendor, and resource code to demonstrate that the agency uses categorical funds only to supplement, and not supplant, state and local funds.

4. EXLP 16: Staff Minimum Qualifications

LEAs must ensure that all staff members who directly supervise pupils meet the minimum qualifications for an instructional aide according to the district policies.

Based on the review of uploaded staff documentation submitted in the CMT by AIPC, it was

The means by which a finding is resolved is the responsibility of the LEA unless specified in law. Authorized LEA staff may request suggestions from CDE staff on the resolution of findings.



Federal Program Monitoring 2020-21
Notification of Findings
American Indian Public Charter (01612596113807)

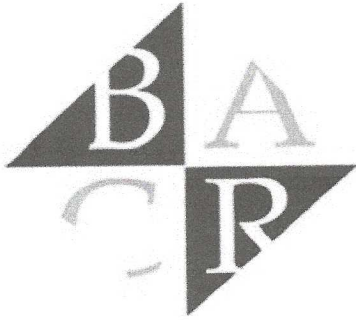
Preliminary

determined that two of the staff did not meet the minimum qualifications.

AIPC must provide evidence that all staff who directly supervise pupils meet the minimum requirements for an instructional aide according to the agency's policies. Evidence may include: Certificate of Completion of the Paraprofessional Exam, or a transcript demonstrating the staff member has acquired the required amount of 48 undergraduate semester units. In addition, similar documentation for staff providing fee-based program at this site.

The means by which a finding is resolved is the responsibility of the LEA unless specified in law. Authorized LEA staff may request suggestions from CDE staff on the resolution of findings.

EXLP 09: Funding Direct Services to Pupils (AIPCS)



Bay Area Community Resources
 171 Carlos Drive
 San Rafael, CA 94903

To:
 American Indian Model Schools
 171 12th Street
 Oakland, CA 94607

Invoice Date August 1, 2019

Attn: Marisol Magana

Pay to: Bay Area Community Resources		Contact Person:	Marisa Ramirez
Address: 171 Carlos Drive, San Rafael, CA 94903		Title:	Program Director
Phone:	510/559-3025	Billing Period:	Jul 2019
Fax:	510/559-3030	Invoice	2007405
School Site	American Indian Public Charter School		

Per the agreement between American Indian Model Schools (AIMS) and Bay Area Community Resources (BACR) a sub-contractor, for the purposes of providing an after-school program aligned with the School's School Day, Program Quality, and Fiscal Oversight during the 2019-2020 School Year.

The total contract amount for the 19-20 ASES is \$177,382.00

Description of Services Performed	Amount
Invoice Amount for Contract:	
ASES - July 2019	\$3,756.62
Admin @ 15% Total Expense	\$563.49
Total Due	\$4,320.11

/

American Indian Model Schools Admin Signature / Date

Please Remit payment to: Bay Area Community Resources, 171 Carlos Drive, SR, CA 94903
 Attn: Laurie Ziemer - Project Accountant



Bay Area Community Resources
 171 Carlos Drive
 San Rafael, CA 94903

To:
 American Indian Model Schools
 171 12th Street
 Oakland, CA 94607

Invoice Date September 1, 2019

Attn: Marisol Magana

Pay to: Bay Area Community Resources		Contact Person:	Marisa Ramirez
Address: 171 Carlos Drive, San Rafael, CA 94903		Title:	Program Director
Phone:	510/559-3025	Billing Period:	Aug 2019
Fax:	510/559-3030	Invoice	2008405
School Site	American Indian Public Charter School		

Per the agreement between American Indian Model Schools (AIMS) and Bay Area Community Resources (BACR) a sub-contractor, for the purposes of providing an after-school program aligned with the School's School Day, Program Quality, and Fiscal Oversight during the 2019-2020 School Year.

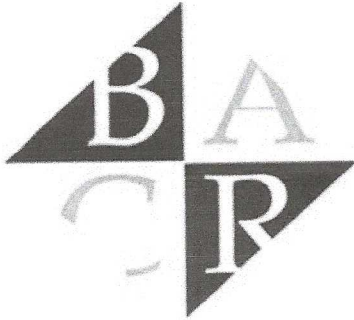
The total contract amount for the 19-20 ASES is \$177,382.00

Description of Services Performed	Amount
Invoice Amount for Contract:	
ASES - Aug 2019	\$7,690.52
Admin @ 15% Total Expense	\$1,153.58
Total Due	\$8,844.10

/

American Indian Model Schools Admin Signature / Date

Please Remit payment to: Bay Area Community Resources, 171 Carlos Drive, SR, CA 94903
 Attn: Laurie Ziemer - Project Accountant



Bay Area Community Resources
171 Carlos Drive
San Rafael, CA 94903

To:
 American Indian Model Schools
 171 12th Street
 Oakland, CA 94607

Invoice Date October 1, 2019

Attn: Marisol Magana

Pay to: Bay Area Community Resources		Contact Person:	Marisa Ramirez
Address: 171 Carlos Drive, San Rafael, CA 94903		Title:	Program Director
Phone:	510/559-3025	Billing Period:	Sep 2019
Fax:	510/559-3030	Invoice	2009405
School Site	American Indian Public Charter School		

Per the agreement between American Indian Model Schools (AIMS) and Bay Area Community Resources (BACR) a sub-contractor, for the purposes of providing an after-school program aligned with the School's School Day, Program Quality, and Fiscal Oversight during the 2019-2020 School Year.

The total contract amount for the 19-20 ASES is \$177,382.00

Description of Services Performed	Amount
Invoice Amount for Contract:	
ASES - Sep 2019	\$12,871.14
Admin @ 15% Total Expense	\$1,930.67
Total Due	\$14,801.81

/

American Indian Model Schools Admin Signature / Date

Please Remit payment to: Bay Area Community Resources, 171 Carlos Drive, SR, CA 94903
Attn: Laurie Ziemer - Project Accountant



Bay Area Community Resources
 171 Carlos Drive
 San Rafael, CA 94903

To:
 American Indian Model Schools
 171 12th Street
 Oakland, CA 94607

Invoice Date November 1, 2019

Attn: Marisol Magana

Pay to: Bay Area Community Resources		Contact Person:	Marisa Ramirez
Address: 171 Carlos Drive, San Rafael, CA 94903		Title:	Program Director
Phone:	510/559-3025	Billing Period:	Oct 2019
Fax:	510/559-3030	Invoice	2010405
School Site	American Indian Public Charter School		

Per the agreement between American Indian Model Schools (AIMS) and Bay Area Community Resources (BACR) a sub-contractor, for the purposes of providing an after-school program aligned with the School's School Day, Program Quality, and Fiscal Oversight during the 2019-2020 School Year.

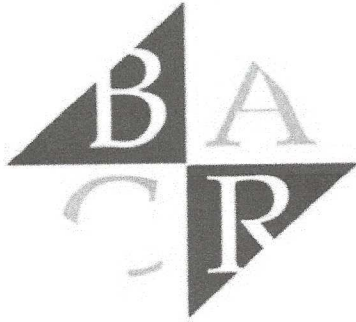
The total contract amount for the 19-20 ASES is \$177,382.00

Description of Services Performed	Amount
Invoice Amount for Contract:	
ASES - Oct 2019	\$16,009.04
Admin @ 15% Total Expense	\$2,401.36
Total Due	\$18,410.40

/

American Indian Model Schools Admin Signature / Date

Please Remit payment to: Bay Area Community Resources, 171 Carlos Drive, SR, CA 94903
Attn: Laurie Ziemer - Project Accountant



Bay Area Community Resources
 171 Carlos Drive
 San Rafael, CA 94903

To:
 American Indian Model Schools
 171 12th Street
 Oakland, CA 94607

Invoice Date December 1, 2019

Attn: Marisol Magana

Pay to: Bay Area Community Resources		Contact Person:	Marisa Ramirez
Address: 171 Carlos Drive, San Rafael, CA 94903		Title:	Program Director
Phone:	510/559-3025	Billing Period:	Nov 2019
Fax:	510/559-3030	Invoice	2011405
School Site	American Indian Public Charter School		

Per the agreement between American Indian Model Schools (AIMS) and Bay Area Community Resources (BACR) a sub-contractor, for the purposes of providing an after-school program aligned with the School's School Day, Program Quality, and Fiscal Oversight during the 2019-2020 School Year.

The total contract amount for the 19-20 ASES is \$177,382.00

Description of Services Performed	Amount
Invoice Amount for Contract:	
ASES - Nov 2019	\$15,860.04
Admin @ 15% Total Expense	\$2,379.01
Total Due	\$18,239.05

/

American Indian Model Schools Admin Signature / Date

Please Remit payment to: Bay Area Community Resources, 171 Carlos Drive, SR, CA 94903
 Attn: Laurie Ziemer - Project Accountant



Bay Area Community Resources
 171 Carlos Drive
 San Rafael, CA 94903

To:
 American Indian Model Schools
 171 12th Street
 Oakland, CA 94607

Invoice Date January 1, 2020

Attn: Marisol Magana

Pay to: Bay Area Community Resources		Contact Person:	Marisa Ramirez
Address: 171 Carlos Drive, San Rafael, CA 94903		Title:	Program Director
Phone:	510/559-3025	Billing Period:	Dec 2019
Fax:	510/559-3030	Invoice	2012405
School Site	American Indian Public Charter School		

Per the agreement between American Indian Model Schools (AIMS) and Bay Area Community Resources (BACR) a sub-contractor, for the purposes of providing an after-school program aligned with the School's School Day, Program Quality, and Fiscal Oversight during the 2019-2020 School Year.

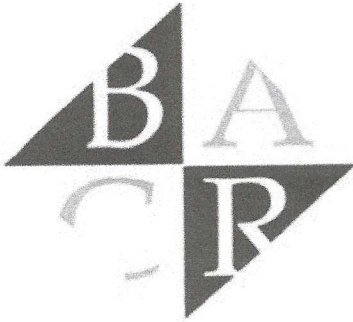
The total contract amount for the 19-20 ASES is \$177,382.00

Description of Services Performed	Amount
Invoice Amount for Contract:	
ASES - Dec 2019	\$14,121.52
Admin @ 15% Total Expense	\$2,118.23
Total Due	\$16,239.75

/

American Indian Model Schools Admin Signature / Date

Please Remit payment to: Bay Area Community Resources, 171 Carlos Drive, SR, CA 94903
Attn: Laurie Ziemer - Project Accountant



Bay Area Community Resources
 171 Carlos Drive
 San Rafael, CA 94903

To:
 American Indian Model Schools
 171 12th Street
 Oakland, CA 94607

Invoice Date February 1, 2020

Attn: Marisol Magana

Pay to: Bay Area Community Resources		Contact Person:	Marisa Ramirez
Address: 171 Carlos Drive, San Rafael, CA 94903		Title:	Program Director
Phone:	510/559-3025	Billing Period:	Jan 2020
Fax:	510/559-3030	Invoice	2001405
School Site	American Indian Public Charter School		

Per the agreement between American Indian Model Schools (AIMS) and Bay Area Community Resources (BACR) a sub-contractor, for the purposes of providing an after-school program aligned with the School's School Day, Program Quality, and Fiscal Oversight during the 2019-2020 School Year.

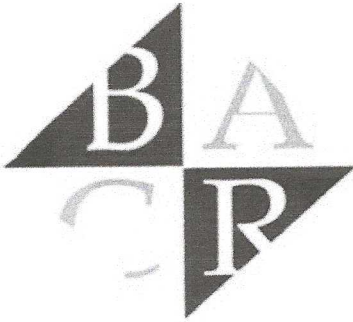
The total contract amount for the 19-20 ASES is \$177,382.00

Description of Services Performed	Amount
Invoice Amount for Contract:	
ASES - Jan 2020	\$9,948.20
Admin @ 15% Total Expense	\$1,492.23
Total Due	\$11,440.43

/

American Indian Model Schools Admin Signature / Date

Please Remit payment to: Bay Area Community Resources, 171 Carlos Drive, SR, CA 94903
 Attn: Laurie Ziemer - Project Accountant



Bay Area Community Resources
 171 Carlos Drive
 San Rafael, CA 94903

To:
 American Indian Model Schools
 171 12th Street
 Oakland, CA 94607

Invoice Date March 1, 2020

Attn: Marisol Magana

Pay to: Bay Area Community Resources		Contact Person:	Marisa Ramirez
Address: 171 Carlos Drive, San Rafael, CA 94903		Title:	Program Director
Phone:	510/559-3025	Billing Period:	Feb 2020
Fax:	510/559-3030	Invoice	2002405
School Site	American Indian Public Charter School		

Per the agreement between American Indian Model Schools (AIMS) and Bay Area Community Resources (BACR) a sub-contractor, for the purposes of providing an after-school program aligned with the School's School Day, Program Quality, and Fiscal Oversight during the 2019-2020 School Year.

The total contract amount for the 19-20 ASES is \$177,382.00

Description of Services Performed	Amount
Invoice Amount for Contract:	
ASES - Feb 2020	\$12,174.46
Admin @ 15% Total Expense	\$1,826.17
Total Due	\$14,000.63

/

American Indian Model Schools Admin Signature / Date

Please Remit payment to: Bay Area Community Resources, 171 Carlos Drive, SR, CA 94903
Attn: Laurie Ziemer - Project Accountant



Bay Area Community Resources
 171 Carlos Drive
 San Rafael, CA 94903

To:
 American Indian Model Schools
 171 12th Street
 Oakland, CA 94607

Invoice Date April 1, 2020

Attn: Marisol Magana

Pay to: Bay Area Community Resources		Contact Person:	Marisa Ramirez
Address: 171 Carlos Drive, San Rafael, CA 94903		Title:	Program Director
Phone:	510/559-3025	Billing Period:	Mar 2020
Fax:	510/559-3030	Invoice	2003405
School Site	American Indian Public Charter School		

Per the agreement between American Indian Model Schools (AIMS) and Bay Area Community Resources (BACR) a sub-contractor, for the purposes of providing an after-school program aligned with the School's School Day, Program Quality, and Fiscal Oversight during the 2019-2020 School Year.

The total contract amount for the 19-20 ASES is \$177,382.00

Description of Services Performed	Amount
Invoice Amount for Contract:	
ASES - Mar 2020	\$12,349.59
Admin @ 15% Total Expense	\$1,852.44
Total Due	\$14,202.03

/

American Indian Model Schools Admin Signature / Date

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Bay Area Community Resources
 171 Carlos Drive
 San Rafael, CA 94903

To:
 American Indian Model Schools
 171 12th Street
 Oakland, CA 94607

Invoice Date May 1, 2020

Attn: Marisol Magana

Pay to: Bay Area Community Resources		Contact Person:	Marisa Ramirez
Address: 171 Carlos Drive, San Rafael, CA 94903		Title:	Program Director
Phone:	510/559-3025	Billing Period:	Apr 2020
Fax:	510/559-3030	Invoice	2004405
School Site	American Indian Public Charter School		

Per the agreement between American Indian Model Schools (AIMS) and Bay Area Community Resources (BACR) a sub-contractor, for the purposes of providing an after-school program aligned with the School's School Day, Program Quality, and Fiscal Oversight during the 2019-2020 School Year.

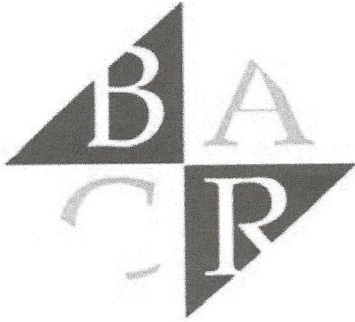
The total contract amount for the 19-20 ASES is \$177,382.00

Description of Services Performed		Amount
Invoice Amount for Contract:		
ASES - Apr 2020		\$11,555.47
Admin @ 15% Total Expense		\$1,733.32
Total Due		\$13,288.79

/

American Indian Model Schools Admin Signature / Date

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Bay Area Community Resources
171 Carlos Drive
San Rafael, CA 94903

To:
 American Indian Model Schools
 171 12th Street
 Oakland, CA 94607

Invoice Date June 1, 2020

Attn: Marisol Magana

Pay to: Bay Area Community Resources		Contact Person:	Marisa Ramirez
Address: 171 Carlos Drive, San Rafael, CA 94903		Title:	Program Director
Phone:	510/559-3025	Billing Period:	May 2020
Fax:	510/559-3030	Invoice	2005405
School Site	American Indian Public Charter School		

Per the agreement between American Indian Model Schools (AIMS) and Bay Area Community Resources (BACR) a sub-contractor, for the purposes of providing an after-school program aligned with the School's School Day, Program Quality, and Fiscal Oversight during the 2019-2020 School Year.

The total contract amount for the 19-20 ASES is \$177,382.00

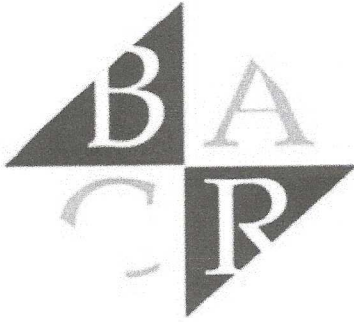
Description of Services Performed

Description of Services Performed	Amount
Invoice Amount for Contract:	
ASES - May 2020	\$16,094.07
Admin @ 15% Total Expense	\$2,414.11
Total Due	\$18,508.18

/

American Indian Model Schools Admin Signature / Date

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Bay Area Community Resources
 171 Carlos Drive
 San Rafael, CA 94903

To:
 American Indian Model Schools
 171 12th Street
 Oakland, CA 94607

Invoice Date July 1, 2020

Attn: Marisol Magana

Pay to: Bay Area Community Resources		Contact Person:	Marisa Ramirez
Address: 171 Carlos Drive, San Rafael, CA 94903		Title:	Program Director
Phone:	510/559-3025	Billing Period:	Jun 2020
Fax:	510/559-3030	Invoice	2006405
School Site	American Indian Public Charter School		

Per the agreement between American Indian Model Schools (AIMS) and Bay Area Community Resources (BACR) a sub-contractor, for the purposes of providing an after-school program aligned with the School's School Day, Program Quality, and Fiscal Oversight during the 2019-2020 School Year.

The total contract amount for the 19-20 ASES is \$177,382.00

Description of Services Performed

Description of Services Performed	Amount
Invoice Amount for Contract:	
ASES - Jun 2020	\$21,814.55
Admin @ 15% Total Expense	\$3,272.18
Total Due	\$25,086.73

/

American Indian Model Schools Admin Signature / Date

Please Remit payment to: Bay Area Community Resources, 171 Carlos Drive, SR, CA 94903
 Attn: Laurie Ziemer - Project Accountant

EXLP 10: Local Contribution of Cash or In-Kind (AIPCS)

American Indian Public Charter School 2020-2021 FPM Review

EXLP 10: Matching Funds

Updated: 11/24/2020

Matching Funds Calculator	Enter your total grant award here=>:	\$ 177,382
Grantee:	<u>American Indian Public Charter School</u>	Required Match
School site	<u>American Indian Public Charter School Max Facilities (25% of Required match)</u>	\$ 14,634

Source (Organization)	Item	Cost Basis for each unit/rationale (Board rental policy; FTE;	Base (what is the base cost e.g. total salary plus benefits of a person; cost per day of a room(s), etc.	Base Description for Column D	Number of units	Unit Description	Units (days, weeks, etc.)	Description of calculation	Total In-kind	Total funds
AIPCS	Head of School time	Salary schedule	\$ 61.00	per hour	2	hours per week	20	weeks	\$ 2,440.00	
AIPCS	Dean of Students time	Salary Schedule	\$ 42.00	per hour	2	hours per week	20	weeks	\$ 1,680.00	
AIPCS	Superintendent time	Salary schedule	\$ 86.00	per hour	1	hours per week	20	weeks	\$ 1,720.00	
AIPCS	Chief Business Officer time	Salary schedule	\$ 60.00	per hour	1	hours per week	20	weeks	\$ 1,200.00	
AIPCS	Operations Director time	Salary schedule	\$ 48.00	per hour	1	hours per week	20	weeks	\$ 960.00	
AIPCS	Operations Manager time	Salary schedule	\$ 45.00	per hour	1	hours per week	20	weeks	\$ 900.00	
AIPCS	Room/space	Rental procedure	\$ 25.00	per day	5	rooms per day	96	days	\$ 14,634.02	\$ 12,000.00
AIPCS	Custodial Staffing	Hourly rate	\$ 22.50	per hour	10	hours per week	20	weeks	\$ 4,500.00	
AIPCS	Cleaning Supplies	Monthly rate	\$ 200.00	per week	1	per week	20	weeks	\$ 4,000.00	
AIPCS	School site contribution	Yearly Contribution	\$ 20,000.00	Per year	1	year	1	Year	\$ 20,000.00	
AIPCS	Snack Program	Total fee	\$ 6,500.00	Per year	1	year	1	Year	\$ 6,502.05	6962.05
			\$ -		0				\$ -	
			\$ -		0				\$ -	
Total:									\$ 58,536.07	
Over/under match:									\$ 0.00	

EXLP 11: Supplement not Supplant (AIPCS)

American Indian Public Charter School
2020-21 FPM Review

EXLP 09: Budget Worksheet 85-15 Summary Worksheet

Fiscal Year: (FY 2019-20 data)

LEA/Agency: American Indian Public Charter School

Please total all charges to ASES and/or 21st Century/ASSETS grant

Total Q1-Q4		Amount - Direct	Amount - Admin	% of time	Amount - Total
Series 1000	Teacher Salaries	\$0.00	\$0.00		\$0.00
	Certificated Personnel Salaries	\$0.00	\$0.00		\$0.00
Series 2000	Site Coordinator	\$40,205.61	\$6,030.84		\$46,236.45
	Program Leaders	\$25,099.30	\$3,764.89		\$28,864.19
	Other Program Staff (Assistant Site Coordinator, Site Assistant, etc.)	\$53,145.47	\$7,971.82		\$61,117.29
	Quality Assurance Coach - allocated portion of Full Time position	\$0.00	\$0.00		\$0.00
	Regional GM - allocated portion of Full Time position	\$0.00	\$0.00		\$0.00
	Classified Personnel Salaries	\$118,450.38	\$17,767.55		\$136,217.93
Series 3000	Site Coordinator - Payroll Taxes and Workers' Comp Insurance	\$0.00	\$0.00		\$0.00
	Program Leaders - Payroll Taxes and Workers' Comp Insurance	\$0.00	\$0.00		\$0.00
	Other Program Staff - Payroll Taxes and Workers' Comp Insurance	\$0.00	\$0.00		\$0.00
	Quality Assurance Coach - Payroll Taxes and Workers' Comp Insurance	\$0.00	\$0.00		\$0.00
	Regional GM - Employee Insurance Benefit	\$0.00	\$0.00		\$0.00
	Site Coordinator - Employee Insurance Benefit	\$10,051.35	\$1,507.71		\$11,559.06
	Program Leaders - Employee Insurance Benefit	\$6,274.78	\$941.22		\$7,216.00
	Other Program Staff - Employee Insurance Benefit	\$13,286.32	\$1,992.94		\$15,279.26
	Quality Assurance Coach - Employee Insurance Benefit	\$0.00	\$0.00		\$0.00
	Regional GM - Employee Insurance Benefit	\$0.00	\$0.00		\$0.00
Series 4000	Employee Benefits	\$29,612.45	\$4,441.87		\$34,054.32
	Classroom Supplies - Including start up, curriculum, safety and other monthly consumable expenses	\$2,464.39	\$369.66		\$2,834.05
Series 5000	Books & Supplies	\$2,464.39	\$369.66		\$2,834.05
	Student Data Information System and other software licensing costs	\$0.00	\$0.00		\$0.00
	Mileage	\$0.00	\$0.00		\$0.00
	Walkie Talkies	\$0.00	\$0.00		\$0.00
	Contingency	\$0.00	\$0.00		\$0.00
	Shirts & Uniforms	\$0.00	\$0.00		\$0.00
	Other expenses	\$0.00	\$0.00		\$0.00
	Other consumables	\$0.00	\$0.00		\$0.00
	Other program costs	\$0.00	\$0.00		\$0.00
	Contracts (only the first \$25,000 per contract)	\$0.00	\$0.00		\$0.00
	Insurance	\$0.00	\$0.00		\$0.00
	Interest	\$0.00	\$0.00		\$0.00
	Payroll processing	\$0.00	\$0.00		\$0.00
	Other allocated costs	\$3,718.00	\$557.70		\$4,275.70
Services & Other Operating Expenses	\$3,718.00	\$557.70		\$4,275.70	
Sub Total		\$154,245.22	\$23,136.78		\$177,382.00
Percentage spent of grant amount		87%	13%		100%
Series 7000	Indirect Cost Percentage (Sub total*ICR-5% as an example)		\$0.00		\$0.00
			\$0.00		\$0.00
Series 5100		\$0.00	\$0.00		\$0.00
	Does not calculate indirect	\$0.00	\$0.00		\$0.00
	Subcontracts and Agreements	\$0.00	\$0.00		\$0.00
Total Expenses		\$154,245.22	\$23,136.78		\$177,382.00
Percentage spent of grant amount		87%	13%		100%

Grant amount \$177,382

At least 85% for direct services and no more than 15 % for administrative services

NOTE This is for the LEA. If there are no subcontracts for services, this suffices as the Grantee total.

EXLP 16: Staff Minimum Qualifications (AIPCS)