

Operations: 3180

Title: Procurement

SLLIS shall follow all applicable State and Federal laws for procurement of goods and services including Micro-Purchases, Small Purchases, Invitations for Bid, Requests for Proposals, Sole Source and Emergency procurements. The School shall not purchase any goods or services from any member of the governing board or administration, an immediate family member of any member of the governing board or administration nor from any entity in which any member of the governing board or administration or an immediate family member of a governing board member or administration may benefit from such a procurement, unless authorized by the governing board after a full disclosure of the conflict of interest or any potential conflict of interest. See Finance 4050 for more information on conflict of interest. All procurements shall be conducted after budget approval by the Board of Directors for identified need of the goods and services.

Micro-Purchases are procurements up to \$10,000 and shall be made by the Superintendent or their designee. Small Purchases include procurements above 10,000 and below 250,000. Small Purchases must solicit at least two written bids for purchases up to 25,000 and three written bids for purchases above 25,000. All small purchases are subject to board approval. Any purchases above 25,000 must have board approval.

All procurement for goods or services above 250,000 must be a competitive solicitation, unless it meets a sole source or emergency procurement definition by law or board policy. Competitive solicitations include IFBs and RFPs. For an IFB, the vendor must be a responsible vendor and meet the IFB specifications. Once vendors have been determined to be responsible and meet IFB specifications, the vendor will be selected based on price. RFP evaluation factors may include proposal response quality, methodology, vendor qualifications and experience, and vendor capacity and responsibility.

1. The purposeful dividing or planning of procurements to avoid competitive procurement requirements is strictly prohibited.
2. Contracts are made only with responsible contractors who meet the requirements to provide goods or services under the terms and conditions of the proposed procurement/contract;
3. Procurement documents shall be made available, upon request, to appropriate government officials.

The Superintendent is charged with developing and maintaining written procurement procedures for SLLIS, which are subject to review and approval by the Board. Efforts shall be made to utilize small businesses, minority-owned firms, women-owned firms, veteran-owned firms, or firms owned by a person with disabilities whenever possible. Business enterprise goals shall be part of the SLLIS written procurement procedures.

Finance: 4070

Title: Federal Fiscal Compliance Policy

The governing body ("Board") of the St. Louis Language Immersion School adopts the following policy which shall be effective on the date that the policy is adopted by the Board.

SECTION 1. Fiscal Requirements under IDEA, Title I, Title II and Title IV of NCLB

SECTION 1.1. Supplement not Supplant. The St. Louis Language Immersion School shall ensure that federal funds will be used to supplement, not supplant regular non-federal funds.

SECTION 1.2. Documentation. Documentation shall be maintained, or caused to be maintained, by the Superintendent or the Superintendent's designee. The documentation must clearly demonstrate the supplementary nature of federal funds.

SECTION 2. Federal Grant Allowable Expenditures. Prior to expending funds, the Superintendent shall consult the appropriate OMB Circular (OMNI Circular) or other federal guidance to determine what costs are allowable. The Superintendent shall ensure that all grant funds are expended in accordance with the Circular or other applicable federal law or rule. The Superintendent or designee will request a drawdown of federal funds using the system required by the Missouri Department of Elementary and Secondary Education only after payment for the expenditure has been made

SECTION 3.

Standards for Documentation of Personnel Expenses (2 C.F.R. § 200.430, OMNI DESE Memo FAS-15-003 Time and Effort under the OMNI Circular, April 2, 2015),

Time and Effort: Records are required for all employees, including teachers, paraprofessionals, administrators, and other staff that are paid with federal funds to document the time and effort they spend within the program. The portion of the federally paid salary should be reflective of the actual activity, not budgeted, the individual has put forth for that federal program. Time and effort reporting is required when any part of an individual's salary is charged to a federal program or used as match for a federal program.

Semi-Annual Certification: Where employees are expected to work solely on a single Federal award or cost objective, charges for their salaries and wages will be supported by periodic certifications that the employees worked solely on that program for the period covered by the certification. These certifications are required to be prepared at least semi-annually.

Monthly Personnel Activity Report (PAR): Where employees work on multiple activities or cost objectives, a distribution of their salaries or wages will be supported by personnel activity reports (PARs). Salaries and wages of employees used in meeting cost sharing or matching

requirements of Federal awards must be supported in the same manner as those claimed as allowable costs under Federal awards.

Charges for salaries must be based on records that accurately reflect the work performed. These records must be:

- Supported by a system of internal controls which provides reasonable assurance that the charges are accurate, allowable, and properly allocated;
- Incorporated into the official records;
- Reflecting the total activity for which the employee is compensated, not to exceed 100%;
- Encompassing all activities (federal and non-federal);
- Compliant with established accounting policies and practices; and
- Distributed among specific activities or cost objectives.

SECTION 4. Charter Schools Program (CSP), NCLB Title V, Part B

SECTION 4.1. Compliance. If the St. Louis Language Immersion School receives CSP grants, the Superintendent shall ensure that the St. Louis Language Immersion School shall comply and use the federal funds in accordance with all statutes, regulations, and approved applications.

SECTION 4.2. Fiscal Control. The Superintendent shall directly administer or supervise the administration of any projects funding through CSP funds, and shall use fiscal control and fund accounting procedures that ensure proper disbursement of, and accounting for, federal funds.

SECTION 4.3. Procurement. When using CSP funds to enter into a contract for equipment or services the Superintendent shall comply with the applicable federal procurement standards.

SECTION 5. Use of Federal Grant Funds for Procurement

SECTION 5.1. Open and Free Competition. The Superintendent shall ensure that all procurement transactions are conducted in a manner that provides open and free competition as required by law. Awards must be made to the bidder/offeror whose bid/offer is responsive to the solicitation/bid and is most advantageous to the St. Louis Language Immersion School considering quality, price, and other relevant factors deemed appropriate by the St. Louis Language Immersion School in accordance with the law.

SECTION 5.2. Conflicts of Interest. Pursuant to the Conflict of Interest Board Policy, no employee, officer, or agent of, who has a real or apparent conflict of interest, will participate in the selection, award, or administration of a contract supported by federal funds. Employees, officers, and agents may also not solicit or accept favors, gratuities, or anything of monetary value from contractors or their agents.

SECTION 5.3.

The solicitation of bids or offers must provide a clear and accurate description of the requirements to be fulfilled by the bidder, technical requirements to be performed including the

minimum acceptable standards and specific features of brand name or equal descriptions that bidders are required to meet;

Positive efforts shall be made to utilize small businesses, minority-owned firms, and women's business enterprises whenever possible;

The type of procurement instruments used (e.g. purchase orders, IFB, RFP) must be appropriate for the particular procurement;

Contracts are made only with responsible contractors who meet the requirements to provide goods or services under the terms and conditions of the proposed procurement/ contract;

Procurement documents shall be made available, upon request, to appropriate government officials.

SECTION 5.4. Record Documentation. The Superintendent or Superintendent Designee shall ensure there is a cost or price analysis made and documented with every competitive procurement action above 25,000. Appropriate documentation shall be retained in electronic or hardcopy showing the basis of contractor selection. The Superintendent or Superintendent's designee shall monitor and evaluate the contractor performance and document whether the contractor has met the terms, conditions, and specifications of the contract.

SECTION 6. Travel Costs.

Travel costs are the expenses for transportation, lodging, subsistence, and related items incurred by employees who are in travel status on official business of the non-Federal entity. These costs are reimbursable with appropriate approval and documentation of expenses. Travel costs charged to Federal awards/funds must meet the requirements of 2 C.F.R. § 200.474.