

# **CSF Polices and Procedures**

Copies of the primary source documents containing the policies and procedures required to administer the Education Freedom Account (EFA) program may be found on our website at: <a href="https://nh.scholarshipfund.org/apply/nh-education-freedom-accounts/">https://nh.scholarshipfund.org/apply/nh-education-freedom-accounts/</a>.

The documents containing the applicable statutes, policies and procedures used to administer the EFA Program include:

- RSA 194-F (EFA law)
- CSF State Approved Contract
- The EFA Parent Handbook
- The EFA Education Provider Handbook
- Education Provider Signup / Application
- EFA Withdraw Form

Ed 800 Adopted Rules 2/21/22 public-mtg-materials-spec-sboe-2-21-2022.pdf (nh.gov)

#### **CSF EFA Additional Policies**

- Kindergarten Age of Determination Policy
- Pre-Approval of Qualifying Expenses Policy
- Records Retention Policy
- Refund Policy

# KINDERGARTEN AGE OF DETERMINATION POLICY

#### I. GENERAL

The compulsory attendance age in New Hampshire is 6 years old. New Hampshire does not have a state policy which defines early access to kindergarten. The state only requires that public school districts offer at least part-time kindergarten to all resident children aged five and up. The state allows local education agencies and state approved nonpublic schools to determine whether and to what extent early access to kindergarten is allowed and appropriate for the child.

# **II. POLICY**

For the purpose of the EFA program, a child may enroll as a first-time kindergarten student if:

- The child will have their fifth (5th) birthday on or before September 30 of that year, or
- The child has been accepted for early entrance by a public school (outside of the student's resident district) or by a nonpublic school which has received approval to operate by the New Hampshire Department of Education or by the Department of Education of the respective state in which the school is located.
  - Parents of children who receive early entrance into an approved kindergarten program must schedule an appointment with CSF in order to complete the student application in person prior to July 15th.
  - Parents must provide verification of student enrollment. Verification must be in the form of a signed document on the school's letterhead indicating that the child has been enrolled at the school as a kindergarten student.

Students under five years of age after December 31st are not eligible for the EFA program.

# PRE-APPROVAL OF QUALIFYING EXPENSES POLICY

# I. GENERAL

The digital wallet platform eliminates the need for parents to make "out-of-pocket" expenditures and provides for maximum integrity of the program.

#### **II. POLICY**

Each transaction processed through the digital wallet platform will be independently approved or denied by scholarship organization personnel according to the qualifying educational expense categories enumerated in RSA 194-F:2, (a-o).

In the event that an item or expenditure is denied for any reason, the reason for the denial will be communicated to the EFA holder by scholarship organization staff via the digital wallet platform user interface.

#### **REFUND POLICY**

#### I. GENERAL

New Hampshire law (RSA 194-F) requires that EFA funds be administered by a state approved scholarship organization and not directly shared with account holders.

#### II. POLICY

Education service providers shall not refund, rebate, or share EFA funds directly with parents or guardians. In the event that a refund or rebate for goods or services purchased with EFA funds is necessary, EFA funds shall only be returned to the eligible student's EFA account within 30 days.

# **RECORDS RETENTION AND DOCUMENT DESTRUCTION POLICY**

#### I. GENERAL

The Children's Scholarship Fund shall retain records and documents for the period of their immediate or current use, unless longer retention is necessary for historical reference or to comply with contractual or legal requirements. Records and documents include paper and electronic files (including e-mails) regardless of where the document is stored including, servers, desktop or laptop computers or other wireless devices.

The law requires CSF to maintain certain types of records, usually for a specified period of time. CSF maintains guidelines for the retention and destruction of specific categories of records. However, if records are relevant to litigation or potential litigation then they must be preserved until the President & COO advises that the records are no longer needed.

In the course of reviewing and processing scholarship applications, CSF obtains sensitive information about scholarship applicants and their families including income, social security numbers, entitlement benefits and other such information. Employees are prohibited from using this information for any purpose other than the processing of scholarship applications.

Furthermore, employees will not disclose this information to anyone who is not a current CSF employee. Employees must exercise great care in the use and handling of documents containing sensitive applicant information to prevent unauthorized access. All such documents are destroyed in a secure manner (such as shredding) to prevent unauthorized access.

# II. POLICY

DESCRIPTION OF RECORD	TYPE OF RECORD	CURRENT METHOD OF RECORD KEEPING	RETENTION PERIOD
Audited financial statements	Paper & Electronic	Copies of each year posted online and retained in the office by CFO	Permanent
Monthly financial reports	Paper & Electronic	Current year and prior 2 years retained in office by CFO	Current year plus 2 prior years
Family & students application files and scholarship records	Electronic	CiviCore	Permanent
Family application files - all supporting income documents	Electronic	CiviCore	Dispose of after 5 years
EFA - ClassWallet	Electronic	ClassWallet and CSF server (Upon termination of contract with ClassWallet; information will be accessible for 3 years after termination date)	Current year plus 7 prior years