

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: <https://nh.scholarshipfund.org/apply/nh-education-freedom-accounts/>.

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

- RSA 194-F (EFA law)
- CSF EFA State Approved Contract
- The EFA Parent Handbook
- The EFA Student Handbook
- The EFA Provider Handbook
- Education Provider Signup / Application
- EFA Withdraw Form
- [NHED Special Education Eligibility and NH Education Freedom Accounts \(EFA\)](#)
- [ED 800 EFA Administrative Rules](#)

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KINDERGARTEN AGE OF DETERMINATION POLICY

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.

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.
 1. 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.
 2. 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.

Approved: October, 2021

PRE-APPROVAL OF QUALIFYING EXPENSES POLICY

GENERAL

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

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.

Approved: October, 2021

EFA COMPUTER DEVICE POLICY

GENERAL

New Hampshire Administrative Rule ED 800 limits EFA account holders to the purchase of 1 computer device every three years.

POLICY

Computer devices such as Laptops, Desktop Computers, MacBooks and/or iPads, shall be limited to the purchase of 1 computer device every 3 years using EFA funds.

DOCUMENTATION

CSF staff shall document the purchase of each computer device (Laptop, Desktop, MacBook and/or iPad), using EFA funds in the EFA computer device log. Required fields shall include:

- Student ID
- Student Name
- Date Approved
- Order Number
- Approver Initials

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APPEAL PROCESS FOR STUDENT DEEMED INELIGIBLE TO PARTICIPATE IN THE EFA PROGRAM

GENERAL

The scholarship organization is required by law to make available a process for appeal for students deemed ineligible to participate in the EFA program. Eligible families must demonstrate financial need. If you have had **a sudden loss in income as the result of an unexpected job loss or other life altering event such as death**, please follow the process outlined below. Please note that quitting your job is not a reason for appeal if it was determined that you are over the income limit. The process is as follows:

PROCESS

Step 1 - Internal Appeal Process

After you are notified by the scholarship organization that you are not eligible, you may appeal to CSFNH at csfnh@scholarshipfund.org if your income, employment, or household information has decreased due to **a sudden loss in income as the result of an unexpected job loss or other life altering event such as death**.

Please entitle your email "Appeal for Reconsideration" to csfnh@scholarshipfund.org. The appeal must include the reason for the appeal. You will need to explain your loss of income and provide your most recent income documentation (e.g., unemployment letter, six consecutive pay stubs, death certificate). You must include any other supporting documentation of the event with your appeal request. Please email the appeal request and documentation to csfnh@scholarshipfund.org. You may be contacted if the scholarship organization has additional questions or requires additional information or documentation.

Step 2 - The Parent and Education Provider Advisory Commission

If you have completed the Internal Appeal Process and have been found to be ineligible, you may appeal to the Parent and Education Service Provider Advisory Commission if your income, employment, or household information has decreased due to **a sudden loss in income as the result of an unexpected job loss or other life altering event such as death**. The parent or guardian must file a written request for appeal to the Parent and Education Service Provider Advisory Commission. The request for appeal must be mailed to the scholarship organization's Director of Compliance within thirty calendar days of receipt of your denied Appeal Notice of Ineligibility. The appeal must include the reason for the appeal. You will need to explain your loss of income and provide your most recent income documentation (e.g., unemployment letter, six consecutive pay stubs, death certificate). You must include any other supporting documentation of the event with your appeal request. You may be contacted if the scholarship organization has additional questions or requires additional information or documentation.

Please send appeal requests to the following:

CSF New Hampshire, Director of Compliance, 180 Loudon Road, Concord, NH 03301

All appeals will be deemed as sent on the **date of postmark**. All dates on responses will be deemed as sent on the **date of postmark**.

NOTIFICATION OF FAILURE TO PROVIDE ANNUAL RECORD OF STUDENT ATTAINMENT

GENERAL

The EFA law requires that the parents of existing EFA students submit a record of student attainment to the scholarship organization (CSF) annually. The EFA law requires that CSF notify the Department of Education by August 1st of each calendar year of any existing EFA student/s that has not provided an annual record of educational attainment.

An annual record of educational attainment is a method used to determine that your student is making educational progress. You may satisfy this requirement in one of three ways.

- a** You may provide the results of a standardized achievement test to the scholarship organization. (You will have the opportunity to submit this when renewing your EFA application annually.) OR
- b** You may have the eligible student take the New Hampshire statewide student assessment pursuant to RSA 193-C:6. OR
- c** You may provide a letter showing proof of an eligible student portfolio evaluation to the scholarship organization. Please note, this letter must be signed by a New Hampshire certified teacher, a teacher with certification recognized by another state, or an educator currently teaching in a NH nonpublic (private) school may perform a year end evaluation. The student's parent is not eligible to perform the evaluation. If your student is attending a public school outside your resident district full-time or a nonpublic school full-time, you may submit the student's report card in lieu of student portfolio. The report card option is not available to part-time students.

POLICY

CSF shall notify the New Hampshire Department of Education by August 1 of each calendar year of any existing EFA student that has not provided an annual record of educational attainment, pursuant to RSA 194-F:3, III(d)(3).

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Approved: October, 2021

APPEAL PROCESS FOR DENIAL OF EDUCATIONAL EXPENSE

GENERAL

The scholarship organization is required by law to make an appeal process available for the denial of an educational expense. CSF utilizes both an internal review process and an external appeal process in the event that a parent is not satisfied with CSF's initial decision. Parents are free to choose one or both options but most parents start with the internal review.

*Please note - If an order is placed on "incomplete status", CSF will request more information in order to document the educational expense. Incomplete does not mean that your order has been rejected.

INTERNAL APPEAL PROCESS

Step 1 - Internal Appeal Process

If you believe that your expense is EFA allowable and you would like to use the internal appeal process, please email the compliance team at nhapprovals@scholarshipfund.org. Please enter subject line "EFA Internal Order Appeal Order #XXXX". Please include your order number and any supporting documentation which you believe will justify and document the expense as an EFA allowable educational expense for the student. A member of the compliance team will contact you if they have any questions.

EXTERNAL APPEAL PROCESS

Step 2 - External Appeal Process

If you have completed the Internal Appeal Process and your expense has been found to be ineligible, you may appeal to the Parent and Education Service Provider Advisory Commission. The parent or guardian must file a written request for appeal to the Parent and Education Service Provider Advisory Commission. The request for appeal must be mailed to the scholarship organization's Director of Policy and Compliance within thirty calendar days of the rejection of the educational expense. The appeal should contain a letter describing why the appeal is warranted and documentation to support the request as an EFA allowable expense. The scholarship organization may contact you if it has additional questions or seeks additional documentation. You will be notified in writing of the Commission's decision.

Please send appeal requests and supporting documentation to the following:

Children's Scholarship Fund
NH Director of Policy and Compliance
180 Loudon Road
Concord, NH 03301

All appeals will be deemed as sent on the date of postmark. All dates on responses will be deemed as sent on the date of postmark.

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CHILD WITH A DISABILITY AGE OF DETERMINATION POLICY

GENERAL

During the 2021-2022 legislative session, through SB 394, the New Hampshire Legislature amended RSA 186-C:2, I, which changed the definition of "Child with a Disability" to now provide for children between the ages of 3 through 21, inclusive. This law became effective on June 17, 2022. (Source: NH Education Law RSA 186-C:2, I Definition: "Child with a Disability" <https://www.education.nh.gov/sites/g/files/ehbemt326/files/inline-documents/sonh/6-20-22-child-w-disab-age-22-fact-sheet.pdf>)

POLICY

For the purpose of the EFA program, a child that has been identified as a Child with a Disability, which is a student which that has or had an IEP from a public school at any point is eligible to participate in the EFA program up to their 22nd birthday if:

- The student was not exited from special education by dropping out of school and was eligible when the parent refused services to homeschool the child.
- The student was not exited from special education by receiving a diploma and was eligible when the parent refused services to homeschool the child.
- The student was not exited from special education by receiving an alternate diploma and was eligible when the parent refused services to homeschool the child.
- The student was not exited from special education by receiving a certificate of completion or a certificate of attendance and was eligible when the parent refused services to homeschool the child.

Approved: February, 2024

ESTABLISHING PROOF OF NEW HAMPSHIRE RESIDENCY

GENERAL

Before a student can be enrolled in the EFA program, proof of New Hampshire residency must be established by presenting the required documents. A P.O. Box may not be used to verify New Hampshire residency.

Methods which can be used to verify your NH residency include:

- Your current Tax Return that has your name and address on it OR
- W2 that has your name and address on it OR
- 1099 that has your name and address on it OR
- Mortgage documents that have your name and address on it OR
- A copy of your rental agreement/lease that has your name and address on it OR
- Property Tax bill/City/Town documents that have your name and address on it OR
- Copy of Driver's License that has your name and address on it OR
- DMV State ID card that has your name and address on it OR
- Auto Registration/Insurance Policy that has your name and address on it OR
- Domestic Violence Confidentiality ID/card OR
- Legal Guardianship/Foster care/DCYF documents that have your name and address on it OR
- Utility bill (phone, electricity, cable, gas, etc.) that has your name and address on it OR
- Paystub or bank statement that has your name and address on it OR
- A signed and NOTARIZED LETTER from the property owner (not a roommate) where the family is living, stating that they live at that specific address OR
- Medicaid and or SNAP benefit documentation that has your name and address on it

RECORDS RETENTION AND DOCUMENT DESTRUCTION POLICY

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 & CEO 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.

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

NONDISCRIMINATION POLICY

Children's Scholarship Fund complies with applicable Federal and State civil rights laws and does not discriminate on the basis of age, race, color, physical or mental disability, sex, creed, sexual orientation, marital status, national origin or ancestry. This policy of non-discrimination is applicable to all persons employed or served by CSF.

Approved: October, 2021

STUDENT DATA SECURITY AND PRIVACY

Children's Scholarship Fund ("CSF") has been empowering families to find the education option that best fits their children's needs since 1998. CSF is committed to the protection of student data privacy.

CSF will:

- Use data for authorized education purposes only
- Implement and maintain appropriate administrative, technical and organizational security measures to safeguard against unauthorized access, disclosure or theft of Student Personally Identifiable Information and non-public information.
- Enforce strict limits on data retention and destruction (See: Records Retention and Document Destruction Policy)
- Be transparent about the collection and use of data
- Inform the State of any security incident or Data Breach in accordance with NH RSA Chapter 359-C:20: Notice of Security Breach.

Student Personally Identifiable Information ("PII")

Student Personally Identifiable Information or PII is defined as data or information that can be used to distinguish or trace an individual's identity either directly or indirectly through linkages with other information which includes but is not limited to, the student's name, the name of the student's parent or other family members, the address of the student or student's family, a personal identifier, such as the student's social security number, student number, and other indirect identifiers, such as the student's date of birth, place of birth, and mother's maiden name.

How CSF Protects Student Privacy, PII and State Data

- CSF contracts with third-party, SOC II (System and Organization Controls 2) compliant providers/vendors to secure, encrypt, store and backup data.
- CSF does not sell, use or disclose student PII for any marketing or commercial purpose or facilitate its use or disclosure by any other party for any marketing or commercial purposes or permit another party to do so.
- CSF requires that third-party vendors maintain the confidentiality of Student PII in accordance with state and federal law.

- CSF does not include Student PII in public reports without prior permission by parents or the eligible student. CSF may share pictures, videos, and/or newsletters that celebrate the achievements of students. Such media may contain student names, images, or information pertaining to a student's achievement with prior permission.
- CSF will only report aggregated (non-identifying) student data which is required by law to the New Hampshire Education Department ("NHED").

What is SOC II Compliance?

SOC 2 is a framework applicable to all technology service or SaaS companies that store customer data to ensure the organization continues to mitigate the risk of data exposure. It outlines five trust service principles of security, availability, processing integrity, confidentiality, and privacy of customer data as a framework for safeguarding data.

SOC 2 compliance is part of the American Institute of CPAs' Service Organization Control reporting platform. Its intent is to ensure the safety and privacy of customer data, that the company will comply with regulations, and that it has the processes in place to mitigate risk.

What is a SOC II Compliance Report?

A SOC II Compliance Report is designed to certify the security, processing integrity, availability, confidentiality, and privacy of hosted systems and the data that they store or process.

SOC II Compliant Providers/Vendors

CSF contracts with Neon One. Neon One is SOC II Compliant and utilizes Amazon Web Services ("AWS") for server hosting in connection with the Neon One services. AWS provides highly secure data centers that use state-of-the art electronic surveillance and multi-factor access control systems. Neon One uses a variety of industry best practices including but not limited to SSL technology, Server Digital Certificates and 2-Factor Authentication (2FA) to encrypt and secure sensitive data traffic over the Internet. Data replication is over private connections and the database is not directly accessible by IP address from the public Internet.

CSF contracts with Kleo, Inc. dba ClassWallet ("ClassWallet"). ClassWallet is SOC II Compliant and provides a digital wallet and spend management technology platform designed for school districts, nonprofits and state agencies. ClassWallet utilizes Amazon Web Services ("AWS") and industry best practices including but not limited to SSL technology and Server Digital Certificates to secure its data systems.

CSF utilizes Microsoft Office 365 (SOC II Compliant), to provide Microsoft Corporation's Office 365 ("O365"). O365 services are designed to provide performance, scalability, security, management capabilities, and service levels required for mission-critical applications and systems used by business organizations. O365 is physically hosted in Microsoft-managed datacenters utilizing industry best practices including but not limited to SSL technology and 2- Factor Authentication (2FA).

Approved: October, 2021

EFA EDUCATION SERVICE PROVIDER APPLICATION REVIEW PROCESS

Ed 803.02 Education Service Providers.

(a) The scholarship organization shall publish on its website a standard application form, and procedures for review and approval of education service providers including, but not limited to procedures, if any, used by education service providers to ensure background check of employees who have direct contact with students.

APPLICATION REVIEW PROCESS

1 Is the provider currently an approved provider, or has the provider been approved in the past? Yes / No

- If the provider is currently approved, check to confirm that the provider is eligible & update contact information.
- If the provider had been approved previously, but is no longer an approved provider or the provider was removed from the EFA program, do not approve and contact the Director of Compliance.
- If the provider has not been approved previously, then continue.

2 Is the application complete? Yes / No

- a** If yes, continue.
- b** If no, contact the provider and request additional information.

3 Is the applicant an acceptable provider type? Yes / No

- In-Person Private / Nonpublic School, Public School or Academy, Career or Technical School, or Post-Secondary Institution
- Virtual Programs: Private schools or private educational programs that deliver K-12 instruction (education) entirely online
- Learning Center: This category is for institutions that provide courses, classes, tutoring, and specialized education programs.
- Therapists: This category is for providers who have a therapy license or certification. Examples of therapy services include, but are not limited to: speech therapy, occupational therapy, physical therapy, equine/horse therapy, music therapy, vision therapy, art therapy, Applied Behavior Analysis.
- Tutor: This category is for providers who have a valid state, national, or regional credential such as state teaching certificate, college degree or higher. Examples of tutoring include but are not limited to: science, mathematics, language, government, history, health, reading, writing, spelling, art, music, or similar subjects.

- Retailer: This category is for Educational Software Vendors, Curriculum Vendors, Standardized Test Vendors.

a If yes, continue.

b If no, then deny.

4 Has the applicant chosen the correct organizational structure for the application? Yes / No

- Institution/Clinic/Company/Organization, (any type of organization, including schools and nonprofits)

- Self-employed/Individual Provider (a single person, working alone)

a If yes, continue.

b If no, then deny.

5 If the applicant is a School, Institution, Clinic, Company or Organization, are they registered with the governing body in the state in which they are located? Yes / no

a If yes, continue.

b If no, then deny.

6 Is the applicant a self-employed individual and a certified teacher? If yes, has their certification been revoked? Yes / No

a If yes, then deny.

b If the teacher's certification has NOT been denied, then continue.

7 Is the applicant listed on the National Sex Offender Registry? Yes / No

a If yes, DENY & contact & Director of Policy and Compliance

b If no, then continue

8 Has the applicant agreed to the Background Check & Program Assurances Statement? Yes / No

a If yes, then continue.

b If no, then deny.

9 If the applicant is a self-employed individual, has the applicant attached a copy of their resume, relevant education/experience, and or certifications/licenses? Yes / No

a If yes, then continue.

b If no, then request additional documentation.

c If the applicant refuses or does not respond then deny.

APPROVAL OF APPLICATION

If the applicant has satisfied all conditions the applicant may be approved. If additional information is needed, contact the applicant to request additional documentation.

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APPEAL PROCESS FOR DENIAL OF EDUCATION SERVICE PROVIDER

GENERAL

The scholarship organization is required by law, to make an appeal process available for education service providers deemed ineligible to participate in the EFA program. The process is as follows.

PROCESS

Step 1 - Internal Appeal Process

After you are notified by the scholarship organization that you are not eligible, you may appeal the decision if you believe this decision to be in error. Please entitle your email "***Appeal for Reconsideration of Education Service Provider***" to nhapprovals@scholarshipfund.org. The appeal must include the reason for the appeal and any documentation to support your request. Please email the appeal request and documentation to nhapprovals@scholarshipfund.org. You may be contacted if the scholarship organization has additional questions or requires additional information or documentation.

Step 2 - The Parent and Education Provider Advisory Commission

If you have completed the Internal Appeal Process and have been found to be ineligible, you may appeal to the Parent and Education Service Provider Advisory Commission. The request for appeal must be mailed to the scholarship organization's Director of Policy and Compliance within thirty days of receipt of the Notice of Ineligibility.

The appeal must include the reason for the appeal and any documentation which will support your request. The provider will be notified in writing of the Commission's decision. You may be contacted if the scholarship organization has additional questions or requires additional information or documentation. All appeals will be deemed as sent on the date of postmark.

All dates on responses will be deemed as sent on the date of postmark.

Please send appeal requests to the following:

CSF New Hampshire
Director of Policy and Compliance
180 Loudon Road
Concord, NH 03301

An education service provider may also appeal the scholarship organization's decision directly to the NHDOE pursuant to Ed 200, which can be found on the New Hampshire Department of Education's website.

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PROCEDURE FOR THE INVESTIGATION OF INTENTIONAL MISUSE OF EFA FUNDS

I: RECEIPT OF A COMPLAINT/ALLEGATION

It is the duty of the Director of Policy and Compliance to review any allegation of intentional misuse of EFA funds.

Reporting Entity - CSF Team Member

If a CSF team member suspects the intentional misuse of EFA funds at any time, the team member shall immediately contact the Director of Policy and Compliance or the NH Executive Director ("Director"). The Director will meet with the team member to obtain all relevant information.

Reporting Entity - Third Party Reporters

If the scholarship organization is notified by a third-party or parent of suspected intentional misuse of EFA funds, the Director will obtain all relevant information from the individual making the allegation or complaint. At a minimum, the scholarship organization must identify the nature of the complaint, the name/s of the organization or individual/s believed to be involved, and copies of all relevant documentation.

II: INITIAL ASSESSMENT

The Director will review each allegation or complaint to determine whether or not there is a basis to investigate the issue/s identified in the complaint further. If an allegation is found to have merit, the Director of Policy and Compliance will launch an investigation which may involve more complex analyses of processes, extensive tests of records, and follow-up interviews. The EFA account will be suspended pending the resolution of the investigation.

- If an allegation is invalid and or without merit, the report will be closed.
- The scholarship organization will generally limit its investigations to situations involving loss or intentional misuse of EFA funds or other types of misuse that may have occurred.
- The scholarship organization will document and report any such cases of repeated, clearly frivolous, or abusive complaints.

III: INVESTIGATION

The goals of an investigation of potential intentional misuse are to determine if the allegations are valid, then to identify control weaknesses or breakdowns in procedure that allowed the situation and any related problems to occur, determine the extent of any loss, and recommend corrective action to prevent the situation from recurring.

Investigations of potential misuse must be conducted in a confidential manner and with respect for the rights of the individual/s involved.

The type of investigative procedures used will depend on the nature of the potential misuse and the results of the preliminary review. The investigation may close with the preliminary review if the review shows the allegations are not valid, or if the issues are minor/unintentional and can be resolved through meetings with the EFA holder.

IV. INVESTIGATION REPORTING

The Director shall present a report of their findings to the Executive Director at the conclusion of the investigation. If a determination of suspected intentional misuse of EFA funds has been made, the NH Executive Director shall notify the New Hampshire Department of Education, the State Board of Education, and the New Hampshire Attorney General's Office within 5 days of making such a determination.

The scholarship organization will notify local and/or state law enforcement if the amount of misused funds exceeds the amount of a Class B Felony (\$500 or greater).

If an eligible student, or the eligible student's parent or guardian, is free from personal misconduct, the scholarship organization will reinstate the eligible student's EFA account. If the eligible student has been determined to be free from personal misconduct, but not the eligible student's parent or guardian, that student shall be eligible for an EFA in the future if placed with a new guardian or other person with the legal authority to act on behalf of the eligible student.

V: PROCEDURE FOR APPEAL

If a determination of suspected intentional misuse of EFA funds has been made, the EFA account may be terminated. Administrative Rule Ed 800 affords the parent, guardian, or EFA student the right to appeal the decision to the State Board of Education (BOE) pursuant to ED 200.

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PROCEDURE FOR THE INVESTIGATION OF EDUCATION SERVICE PROVIDER

I: RECEIPT OF A COMPLAINT/ALLEGATION

It is the duty of the Director of Policy and Compliance to review any allegation or complaint against an Education Service Provider. CSF may bar an education service provider from accepting payments from EFAs if the scholarship organization determines that the education service provider has:

- a** Knowing and willfully misrepresented information;
- b** Failed to refund any overpayments within 30 days or failed to process a request for a refund; and
- c** Routinely failed, meaning 3 or more times, to provide students with promised educational goods or services;

Reporting Entity - CSF Team Member

If a CSF team member suspects intentional or substantial misrepresentation, failure to provide goods or services, or the failure to refund an overpayment to an EFA account in a timely manner (within 30 days), the team member shall immediately contact the Director of Policy and Compliance or the NH Executive Director ("Director"). The Director will meet with the team member to obtain all relevant information.

Reporting Entity - Third Party Reporters

If the scholarship organization is notified by a third party or parent, the Director will obtain all relevant information from the individual making the allegation or complaint. At a minimum, the scholarship organization must identify the nature of the complaint, the name/s of the organization or individual/s believed to be involved, and copies of all relevant documentation.

II: INITIAL ASSESSMENT

The Director will review each allegation or complaint to determine whether or not there is a basis to investigate the issue/s identified in the complaint further. If an allegation is found to have merit, the Director of Policy and Compliance will launch an investigation which may involve more complex analyses of processes, extensive tests of records, and follow-up interviews. The EFA account will be suspended pending the resolution of the investigation.

- If an allegation is invalid and or without merit, the report will be closed.
- The scholarship organization will generally limit its investigations to situations involving loss or intentional misuse of EFA funds or other types of misuse that may have occurred.
- The scholarship organization will document and report any such cases of repeated, clearly frivolous, or abusive complaints.

III: INVESTIGATION

The goals of an investigation are to determine if the allegations are valid, then to identify control weaknesses or breakdowns in procedure that allowed the situation and any related problems to occur, determine the extent of any loss, and recommend corrective action to prevent the situation from recurring. All Investigations must be conducted in a confidential manner and with respect for the rights of the individual/s and entities involved.

The provider will be given the opportunity to respond to any allegation or complaint brought against it including the opportunity to provide any and all documentation to support its response.

The type of investigative procedures used will depend on the nature of the complaint and the results of the preliminary review. The investigation may close with the preliminary review if the review shows the allegations are not valid, or if the issues are minor/unintentional and can be resolved through meetings with the EFA holder and the provider.

IV. INVESTIGATION REPORTING

The Director shall present a report of their findings to the Executive Director at the conclusion of the investigation.

If a determination to bar the provider from the EFA program has been made:

1. The provider shall receive notice in writing.
2. CSF shall notify parents/guardians within 5 days.
3. CSF shall notify the Department within 5 days.
4. The provider shall be removed from the EFA Approved Provider List.

V: PROCEDURE FOR APPEAL

If a provider has been barred from participating in the EFA program, the provider may appeal this decision with the New Hampshire Department of Education.

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PROCEDURE TO REPORT SUSPECTED ABUSE OR NEGLECT

NH Law requires that any New Hampshire person who suspects that a child under age 18 has been abused or neglected must report that suspicion immediately to DCYF (Division of Children, Youth and Families of the New Hampshire Department of Health and Human Services). (New Hampshire RSA 169-C:29-31). *Under RSA 169-C:30, the initial report "shall be made immediately via telephone or otherwise."* To report child abuse or neglect to DCYF, call 24/7 (800) 894-5533 (in-state) or (603) 271-6562.

In cases of current emergency or imminent danger, call 911.

The requirement to report is not dependent on whether there is proof of the abuse or neglect, nor is it dependent upon whether the information suggests the abuse or neglect is continuing or happened in the past. Any doubt regarding whether to report should be resolved in favor of reporting. Failure to report may be subject to criminal prosecution, while a report made in good faith is entitled to both civil and criminal immunity.

The report should contain the following information to the extent that you are possible to provide:

- The name, address, sex, and estimated age of the child and any other children at the home
- The names, addresses, and telephone numbers of the adults who are responsible for the child
- The full nature and extent of the child's injuries, maltreatment, or neglect
- Any information about previous injuries, abuse, maltreatment or neglect
- How great a risk you believe this may be to the child
- How you learned of this situation
- Any action that has been taken to treat or assist the child
- Any other information that could be helpful in determining the cause of the injuries
- A written report may be requested by DCYF within 48 hours.

FUNDS NOT APPLIED TO ADMINISTRATIVE COSTS POLICY

GENERAL

This policy specifies that CSF shall retain no more than 10% of all EFA payments from the State of New Hampshire for EFA program administrative costs. A reasonable estimate for deferred administrative costs will be calculated for the balance of unspent EFA funds at CSF's fiscal year end, in accordance with the contractual agreement that CSF shall remain responsible for administration of such funds even if such funds remain after termination of this contract. Any remaining funds after the recording and reconciliation of EFA administrative costs will be distributed on a pro rata basis to active students in the EFA program.

POLICY

CSF shall retain no more than 10% of funds to be disbursed annually to qualified EFA students for educational expenses as recovery for administrative costs.

CSF shall distribute any administrative funds in excess of EFA administrative costs on a pro rata basis to active EFA students at the end of the year once all EFA administrative costs are recorded and reconciled.

Approved: May 2024

Sample

NH STATE AND FBI CRIMINAL RECORDS CHECK POLICY

Background

CSF has developed a "*Sample NH State and FBI Criminal Record Check Policy*" that may be used by approved education service providers for employees of service providers who have direct contact with students. Sample documents should **NOT** be considered as legal advice, guidance or counsel. Employers should consult their own attorney about their compliance responsibilities under applicable state and federal laws. CSF expressly disclaim any warranties or responsibility or damages associated with or arising out of the information provided.

Sample Policy

All individuals having direct contact with students must submit to a State and FBI Criminal Records Check.

Conditional Employment

All persons who have been selected for employment may be hired on a conditional basis, pending a successful completion of the NH State and FBI Criminal Record Check. No selected applicant for employment shall be extended a conditional offer of employment until the **BUSINESSOWNER**, or his/her designee, has initiated the formal NH State and FBI Criminal Record Check process and has completed a background investigation.

Any person who is offered conditional employment, by way of individual contract or other type of letter of employment, will have clearly stated in such contract or letter of employment that his/her contract and continuation of employment is entirely conditioned upon the completion of a NH State and FBI Criminal Records Check which is satisfactory to **BUSINESS NAME**.

Final Offer of Employment

An individual who has been extended a conditional offer of employment may be extended a final offer of employment upon the completion of a State and FBI Criminal Records Check which is satisfactory to **BUSINESS NAME**.

When **BUSINESS NAME** receives a notification of a felony conviction from the State Police on a particular person which it finds unsatisfactory, **BUSINESSOWNER** shall bar the individual's access to students and dismiss said person within twenty-four (24) hours of the receipt of such report.

Independent Contractors

An individual who has been selected as an independent contractor may be contracted on a conditional basis, pending a successful completion of the NH State and FBI Criminal Record Check. Any person who is offered an individual contract will have clearly stated in such contract that his/her contract and continuation of the contract are entirely conditioned upon the completion of a NH State and FBI Criminal Record Check which is satisfactory to **BUSINESS NAME**.

When **BUSINESS NAME** receives a notification of a felony conviction from the State Police on a particular person which it finds unsatisfactory, **BUSINESSOWNER** shall bar the individual's access to students and dismiss said person within twenty-four (24) hours of the receipt of such report.

Sample documents should NOT be considered as legal advice, guidance or counsel. Employers should consult their own attorney about their compliance responsibilities under applicable state and federal laws. CSF expressly disclaim any warranties or responsibility or damages associated with or arising out of the information provided.