



**POLICIES OF  
THE EINSTEIN GROUP, INC.**

**Updated 2021-2022**

**(Includes November 2021 Updates)**

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**BYLAWS OF**  
**THE EINSTEIN GROUP, INC.**

**ARTICLE I: NAME, LOCATION AND FISCAL YEAR**

**Section 1.1 Name:** The name of the organization shall be The Einstein Group, Inc., sometimes hereinafter referred to as “The Einstein Charter School” or the “Corporation.”

**Section 1.2 Location:** The principal office of the organization shall be located at the Einstein Charter School at Sherwood Forest, 4801 Maid Marion, Drive, New Orleans, LA 70128.

**Section 1.3 Fiscal Year:** The fiscal year of the organization shall begin on July 1 and end of June 30, unless otherwise determined by the Board of Directors.

**ARTICLE II: BOARD OF DIRECTORS**

**Section 2.1 Number and Qualification:** The Corporation shall have Board of Directors (“Board”) consisting of no fewer than seven (7) and no more than twelve (12) voting members. At least one member of the Board shall possess significant experience in financial affairs to assist the Board in better managing the fiscal affairs of the Corporation. At least one member of the Board must be a certified educator with significant experience in education and in good standing in the State of Louisiana. One member of the Board must be a resident of the New Orleans East community.

**Section 2.2 Term:** The term of office for a Board member is three (3) years with board evaluation to determine whether the term should continue for an additional 3-years as is, transition to a committee member, or transition to vacancy. The number of additional terms, beyond the initial 3 years, is unlimited pending evaluation approval preceding the end of the 3-year term.

**Section 2.3 General Powers:** The governing board of The Einstein Group, Inc. shall be referred to as the Board of Directors (“Board”). The affairs of the Corporation shall be managed under the direction of its Board. All powers of the Corporation may be exercised by the Board. Subject to the limitations contained within the provisions of the Louisiana Non-Profit Corporation Law (La. R.S. 12:201 *et seq.*), the Louisiana Charter School Act (La. R.S. 17:3971 *et seq.*), the Articles of Incorporation, these bylaws, and all policies established by the Corporation’s Board of Directors, the Board shall set the policies of the Corporation, shall supervise, manage, and control the affairs and activities of the Corporation, and may adopt positions on issues of substance related to the purpose of the Corporation. All powers of this Corporation shall be exercised by, or under the authority of, the Board. Without prejudice to such general powers, but subject to the same limitations, it is hereby expressly declared the Board shall have the following powers, to wit:

1. To select and remove officers of the Corporation; to prescribe such powers and duties for them as may not be inconsistent with the Louisiana Non-Profit Corporation Law (La. R.S. 12:201 *et seq.*), the Louisiana Charter School Act (La. R.S. 17:3971 *et seq.*), the Articles of Incorporation, and these bylaws; to employ, discharge, and fix the compensation of Corporation personnel.
2. To establish and control policies concerning the affairs and business of the Corporation; to determine on an annual or other basis the substantive areas in which the Corporation’s activities are to be concentrated; to establish on an annual or other basis the priorities of the Corporation; and to oversee generally the implementation of the Corporation’s program.
3. To Borrow money or incur indebtedness for the purpose of the Corporation, and to

cause to be executed and delivered therefore, in the name of the Corporation, promissory notes, bonds, debentures, deeds of trust, mortgages, pledges, hypothecations, or other evidences of debt and securities therefore.

**Section 2.4 Board Vacancies:** A vacancy shall be deemed to exist upon the death, resignation or removal of any member.

2.4.1. The Board may declare vacant the office of any member who has been convicted of a felony, or has been found to have breached any duty arising under Louisiana law, or to be of unsound mind, by a court of competent jurisdiction, has failed to attend three (3) meetings of the Board in a single calendar year, or is involved in any activities that may be considered a conflict of interest.

2.4.2. Removal: Removal of a member for one or more of the reasons listed in subsection 2.4.1 above may be initiated by the written or verbal petition of any member of the Board. The issue of removal of a Board member shall be taken up at the next scheduled meeting of the Board after receiving such petition, and shall be conducted with regard for the reasonable due process rights of all parties and shall be open to the public, except where either the Board or the member whose removal is sought requests a closed session. Where a closed session is held, the final action of the Board shall be taken in public. After reasonable notice and opportunity to respond, a member may be removed by a vote of two-thirds (2/3) of the Board members then serving if, in their judgment, the best interests of the Corporation would be served thereby.

2.4.3. Resignation: Subsequent to the initial meeting of the Board, any member may resign at any time by notifying the Board President or Secretary in writing.

Such resignation shall take effect on the date of receipt of such notice or at any other time therein specified, and, unless otherwise specified, the acceptance of such resignation shall not be necessary to make it effective.

2.4.4. In the event that Board membership falls below seven (7) members as a result of the removal, resignation, or death of any member or members, the Board President may fill the vacancy by appointing a qualified individual who shall serve for the remainder of the filled term.

**Section 2.5 Election of Members:** Election of new members shall be held at an appointed time determined by the Board President. The term for newly elected members shall begin the following month. A new member shall be elected to the Board by a majority vote of all currently serving members.

**Section 2.6 Compensation:** Board members shall not receive any salaries or fees for their services as members, and shall be further prohibited from serving the Corporation in any other capacity or providing goods or services and receiving compensation therefore. To the extent permitted by law, members may be reimbursed for ordinary and necessary expenses that he or she may incur in transacting business on behalf of the Corporation, but only after securing approval from the Board President prior to incurring such expenses.

**Section 2.7 Indemnification of Board Members:** To the fullest extent permitted by law, the Corporation shall indemnify the members of its Board of Directors and its Officers, or former Board members and Officers, against judgments and fines (whether civil, criminal, administrative, or investigative) and amounts paid in settlement, costs and expenses (including reasonable attorneys' fees) actually and necessarily incurred by him or her in connection with the defense of any pending or threatened action, suit or proceeding in which he or she is or may be

made a party by reason of having been a Board Member or Officer, for acts or omissions committed within the scope of activity as a Board Member or Officer, provided that the Board of Directors determines that the person or persons to be indemnified reasonably believed that he or she was acting in the best interest of the Corporation, and did not act willfully, with gross negligence, or with fraudulent criminal intent.

### **ARTICLE III: OFFICERS OF THE BOARD OF DIRECTORS**

**Section 3.1 Officers:** The Offices of the Board of Directors shall include a President, Vice President, Secretary, and any other offices so created by at least a two-thirds (2/3) vote of the Members then serving. The Corporation may also have, at the discretion of the Board, such other Officers as may be appointed by the Board.

**Section 3.2 Term and Election of Officers:** The term of Office shall be two (2) years with a one year extension (not to exceed 3 consecutive years in the same office). The Board shall hold a meeting annually during the month of June for the purposes of electing Officers. Vacancies (due to removal, resignation, disqualification, death or otherwise) may be filled for the unexpired portion of the term at any regular meeting of the Board by a majority vote of the Members then serving.

**Section 3.3 Resignation and Removal of Officers:** Any Officer may resign his or her office at any time by notifying the President, Vice President or Secretary in writing. Such resignation shall take effect on the date of receipt of such notice or at any other time specified therein, and, unless otherwise specified, the acceptance of such resignation shall not be necessary to make it effective. An Officer may be removed at any time, for good cause shown, by a vote of two-thirds (2/3) of the Members then serving if in their judgment the best interest of the

Corporation would be served thereby.

**Section 3.4 President:** It shall be the duty of the President of the Board to preside over all meetings of the Board, to set the calendar of the Board, to name the members of all standing and special committees of the Board, and to fill all vacancies in the membership of such committees, in accordance with the provisions of these bylaws.

**Section 3.5 Vice President:** It shall be the duty of the Vice President of the Board to preside over all meetings of the Board in the absence of the President of the Board; and to fulfill any other duties of the President should the President be unable to perform those duties.

**Section 3.6 Secretary:** It shall be the duty of the Secretary to take the minutes of all meeting of the Board. The Secretary shall also keep a record of when each member began his or service on the Board or as an Officer of the Board, and shall inform the Board President or Vice President of when the term of a Member and/or Officer is about to expire. The Secretary shall also serve as the custodian of the Board's records and is responsible for keeping and retaining all minutes, agendas, papers and other documents of the Board. Copies of all minutes, papers and documents of the Board may be certified to be true and correct copies by the Secretary. If for any reason the Secretary is unable to attend a meeting of the Board, the President, or Vice President if acting as President, shall appoint any other Member of the Board to act as Secretary for that meeting by taking the minutes.

#### **ARTICLE IV: BOARD COMMITTEES**

Section 4.1 Committees: The Board may create and organize itself into various committees in order to better fulfill its responsibilities. Such committees shall include: the Academic Committee as a whole, the Outreach Committee, the Governance and Finance Committee, and any other committee the President shall deem necessary and proper to efficiently

and effectively perform the duties of the Board.

4.1.1. Any such committee shall not be authorized to act on behalf of the Corporation or of the Board as a whole, but shall serve solely in an advisory capacity in making such recommendations to the Board as it concludes are desirable and expedient.

4.1.2. A member of a committee must be appointed by the chair of that committee to take the minutes of each meeting of that committee.

4.1.3. Any member of the Board, including Officers and non-Officers, may serve on a committee, as shall be appointed by the President of the Board.

**Section 4.3 Appointment and Term of Committees:** The President shall appoint all members of all committees. The term of committee appointees shall run concurrently with that of the President of the Board. Vacancies occurring among the appointive members of any committee, however arising, shall be filled by the President for the remainder of the term.

#### **ARTICLE V: MEETINGS OF THE BOARD**

**Section 5.1 Annual, Regular, Special and Committee Meetings:** All annual, regular, special and committee meetings of the Board shall be held in accordance with La. R.S. 42:4.1 *et seq.*

**Section 5.2 Regular Meetings:** The Board shall attempt to meet no fewer than ten (10) times per year at a location to be determined by the President.

5.2.1. Open Meetings: All regular meetings of the Board shall be open to the public except when otherwise ordered by the Board for the consideration of executive matters as prescribed by La. R.S. 42:6.1 *et seq.* No final or binding action shall be taken in a closed or executive session. The President of the Board

shall prepare and forward to each member of the Board a tentative agenda for the meeting. At his or her discretion, the President of the Board may place a particular item or subject on the agenda upon the request of any member of the Board. All matters requiring action of the Board, however, may be acted on even though not carried on the agenda, if agreed upon by a majority of the Board members present.

5.2.2. Notice: The Board shall give written public notice of all regular, special or rescheduled meetings at least twenty-four (24) hours prior to the meeting. This notice shall be posted at the Einstein Charter School at Sherwood Forest, 4801 Maid Marion Drive, New Orleans, LA 70128. Each meeting notice shall include the agenda, date, time and place of the meeting.

5.2.3 Public Comment: Citizens or other individuals or delegations who desire to speak on an agenda item before that item is discussed and voted on by the Board may do so by submitting a fully completed and signed "Speaker's Card" and submitting it to the President or Secretary prior to the start of the meeting and up until Roll Call. After Roll Call has begun, any further requests to address the Board may be denied at the Board's discretion. In the case of a delegation wishing to address the Board, each delegation shall select one of its members to be its speaker and identify the speaker on the submitted Speaker's Card.

Comments by any speaker shall be strictly limited to the agenda item before the Board. Scheduled comment periods shall not exceed thirty (30) minutes with individual speakers limited to three (3) minutes each. Speakers shall refrain from making accusatory or defamatory comments about individuals by name. Speakers

who violate this policy may be denied the opportunity to continue to address the Board during that meeting. Each speaker may address the Board only once per meeting.

5.2.4 Agenda Items: Each agenda item shall be reasonably clear so as to advise the public in general terms of the matters to be taken up during the meeting of the Board. Any such matter shall be identified in the motion to take up the matter not on the agenda with reasonable specificity. Prior to any vote on such motion, there shall be an opportunity given for public comment.

5.2.5 Minutes: The minutes of the meetings of the Board record official action taken upon motions or resolutions that are voted upon by the Board, and may contain a summary or report and pertinent discussion. In all cases when the action is not by a unanimous vote, the “ayes,” “nays” and abstentions of the individual members shall be recorded upon the request of any Member. The minutes of the meeting become official only when adopted by the Board.

**Section 5.4 Quorum:** The majority of the Members of the Board of Directors currently serving shall constitute a quorum for the purpose of transacting business or voting on action items at any meeting of the Board.

**Section 5.5 Rules of Order:** When not in conflict with any provisions of these bylaws, the latest revision of Robert’s Rules of Order shall constitute the rules and procedure of all meetings of the Board.

**Section 5.6 Order of Business:** The order of business is determined by the agenda.

## **ARTICLE VI: MISCELLANEOUS**

**Section 6.1 Tax Returns and Financial Statements:** The Corporation shall file timely its annual federal income tax as required by federal tax regulations and instructions.

**Section 6.2 Execution of Documents:** The Board may authorize any Officer or Officers, or agent or agents to enter into any contract or execute any instrument in the name of and on behalf of the Corporation, and such authority may be general or confined to specific instances. Unless so authorized by the Board, no Officer, agent or other person shall have any power or authority to bind the Corporation by any contract or engagement, or to pledge its credit or render it liable for any purpose for to any amount.

The Board authorizes the Chief Executive Officer to conduct all transactions in the Corporation's normal course of business.

**Section 6.3 Compliance of Public Records Law:** The Corporation shall comply with all aspects of the Louisiana Public Records Law (La. R.S. 44:1 *et seq.*).

**Section 6.4 Inspection of bylaws:** The Corporation shall keep in its principal office and/or on the official website the original or a copy of these bylaws, as amended or otherwise altered to date, certified by the Secretary, which shall be open to inspection by any Members of the Board at all reasonable times during office hours.

**Section 6.5 Accountant and Legal Counsel:** The Corporation shall have the right to retain an accountant and legal counsel.

**Section 6.6 Policies and Procedures:** Any action by the Board establishing a policy or method or procedure, administrative, business, academic or otherwise, not contained in these bylaws, shall be known as Policies and Procedure of the Board." Policies and Procedures of the Board may be adopted by the Board, or may be amended or repealed, in whole or in part at any

meeting of the Board in accordance with the law.

**ARTICLE VII: ARTICLES OF INCORPORATION AND BYLAWS**

**Section 7.1 Adoption:** The Articles of Incorporation or these bylaws may be adopted by a majority vote of the currently serving Members of the Board.

**Section 7.2 Alteration, Amendment or Repeal:** The Articles of Incorporation or these bylaws may be altered, amended or repealed by the vote of a two-thirds (2/3) majority of the currently serving Members of the Board.

**Section 7.3 Annual Review:** The Board Governance and Finance committee and any other Members or Officers of the Board shall conduct an annual review of these bylaws to ensure that they are up to date and in accordance with current Louisiana law.

I certify that the foregoing bylaws of the Einstein Group, Inc. were approved and adopted by and on behalf of the Corporation by its Board of Directors on the day of August 19, 2021, and are currently in effect.

Dated: August 19, 2021

By: \_\_\_\_\_

Joe Rochelle, Secretary

## **SEGREGATION OF DUTIES RELATING TO FINANCIAL CONTROLS**

The business office is responsible for all aspects of EGI's operations within the scope of operating policy and budgetary approval by the Governing Board.

The Board, at minimum, will be responsible for:

1. Reviewing and approving a preliminary annual budget prior to the beginning of the fiscal year;
2. Reviewing quarterly or monthly financial statements, which include a balance sheet and statement of revenue, expenditures and changes in fund balance, at each public Board meeting;
3. Annually adopting and maintaining operating budgets;
4. Retaining the services of a certified public accountant/auditor to conduct the annual independent financial audit;
5. Reviewing and approving the audit report, including audit findings and recommendations;
6. Reporting to all applicable legal agencies including the charter school's sponsor;  
and
7. Overseeing the school's leadership and all financial matters delegated to it.

The COO ensures that the business manager and the person collecting monies related to each EGI school will, together, count money collected in the office and sign off on the total received; the business manager maintains the ledger and reconciles the bank accounts; and that the CEO or delegate will review and approve each bank deposit and cash receipt reconciliation.

## **FINANCIAL POLICIES, PROCEDURES, AND INTERNAL CONTROLS**

### **ARTICLE I: Budgeting**

a. As per Section 18: B: 6, of the Charter School Contract, Einstein Charter School shall operate and maintain its budget in accordance with the Louisiana Local Government Budget Act. The Chief Operating Officer develops a preliminary budget in concert with the Senior Business Manager and CEO beginning with a review of the most recent financial statements. The preliminary budget is presented to the Board of Directors and the public is allowed to participate in a public board meeting prior to September 15th of each year. The budget is then adopted by the Board of Directors. During the year, the Senior Business Manager reviews the financial statements on a monthly basis and notifies the CEO and Board of Directors if projected revenues are falling short of budget or if projected revenues are exceeding budget. If necessary, the Board of Directors may amend the budget.

### **ARTICLE II: Revenues**

#### a. Collection and Disposition

1. Einstein Charter School assigned personnel collect, count, and log any and all funds that are collected extemporaneously for student activities. The individuals then deliver those funds collected to the business office, who then places collected monies in the school safe. Original deposit receipts and copies thereof are prepared by the business office personnel (COO and/or business manager) and deposited into the appropriate Liberty Bank Einstein Charter School checking accounts. The School accounts are held under its Internal Revenue Employer Identification Number of 20-0913967.

2. Any funds received other than in Number 1 are received by the CEO or COO and are forwarded to the business office who then processes those receipts as previously described

and processes same into the Einstein Charter School Quickbooks file according to generally accepted accounting principles utilizing the L.A.U.G.H./AFR codes.

3. For student activity purposes, Einstein Charter School maintains a separate Einstein Charter School Student Activity Fund, For field trips and other student activities including Dress-Down Days and various school student activity programs, each teacher prepares a collection log which is submitted to the appropriate school personnel who then counts all monies, logs same then delivers all monies to the business office who then locks all monies in the school safe. Then in a timely manner the monies are prepared and deposited at Liberty Bank of New Orleans by the designated business office personnel with the required original bank deposit receipts plus copies of same. All receipts are logged into the separate accounting system according to accepted accounting principles.

### **ARTICLE III: EXPENDITURES**

#### **Expenditures**

- a. **General:** Expenditures are one of the following: (1) Payroll; (2) Purchasing (3) Quickbooks System computer generated checks for supplies, services and/or equipment.
1. **Payroll** is prepared through an outside payroll company. Checks require two of the following three signatures, the CEO, COO, and/or Senior Business Manager. Employee pay rates are based upon pay schedules as developed by Einstein and adopted by its Board of Directors. Payroll is paid bi-weekly. Office, custodial, and administrative staff are employed year-round. Teachers receive 12 months of pay through a summer bank system. The number and names of School employees, positions, years of experience and salary data are part of the PEP (Professional Educational Profile) file that is submitted to the Louisiana Department of Education

1. **Payroll protocol:** Employee payroll hours worked are logged via an electronic time clock system maintained by our payroll provider. At the conclusion of pay cycles the “timesheet” file is reviewed by the Payroll administrator and then forwarded to the Business Manager who then processes the “timesheets” for transmittal to the payroll processing company. The payroll file is approved by the CEO. The information is transmitted electronically to the payroll processing company. A payroll batch file is transmitted to Einstein from the payroll company and any live checks are printed in-house. These checks are then delivered to the appropriate school sites by the Payroll administrator.

a. All employees receive payroll checks through distribution at the school site or by direct deposit. Payroll checks are distributed bi-weekly on Fridays unless those days fall on a weekend and/or holiday. The Senior Business Manager and/or contracted accountant prepares the necessary General Journal entries for transcription of the payroll register information into the Einstein Charter Quickbooks file.

b. Federal Funds: For all employees whose employment costs are paid with federal funds, time certification sheets (Federal form A-87) are completed for each program specific employee for time periods covered for a federal grant drawdown form or Request for Reimbursement, signed and dated by each specific employee and signed and dated by the designated supervisory personnel. These are then attached to the federal grant drawdown form or Request for Reimbursement process.

2. **Purchasing:** All purchases are managed and ultimately approved by the COO, who works closely with school principals and the Chief Academic Officer to identify needs and to ensure that purchases are made in a timely and cost-effective manner and, when applicable, in accordance with grant restrictions.

a. The COO and Purchasing administrator research multiple vendors and solicit multiple bids to ensure best value.

b. Where possible, the Einstein Group enters into contracts for goods and services that stipulate exactly what is included and excluded from the scope of the contract, the agreed delivery, payment terms, and other standard contractual terms and legal protections.

Contracts require legal review and the approval of the CEO as an authorized signatory of the Board of Directors without a dollar threshold. Contract performance is monitored by the Business Manager and COO.

c. All vendors are required to submit W-9 forms to the Business Office prior to their addition to the vendor database.

d. Purchase Orders are only issued when a vendor requests one before an order can be placed.

e. The Einstein Group is exempt from state and federal tax. As such, the Corporation is exempt from sales taxes on goods purchased for its own internal use and services

f. **All deliveries** for any supplies, any materials, I.e. anything ordered by and delivered to any of the Einstein Charter Group school sites must be signed for by the appropriate school personnel and those delivery notices, drayage receipts and/or packing documents referencing said deliveries must be turned in or forwarded as soon as possible to the Business Office so as to facilitate the reconciliation of anticipated invoices for said deliveries.

3. **Procurement:** Any procurement of goods and services shall be made by the Chief Executive Officer or the employee designated by the Officer, in the best interest of the school, upon considering the totality of the circumstances surrounding the procurement,

which may include but not limited to, price, quality, availability, timelines, reputation, and prior dealings. Einstein Charter School understands that the policy stated above applies to purchases made using non- federal funds. As a condition of the receipt of federal funds through the Innovation in Education/I-3 Grant Program, federal procurement requirements will apply. Specifically, Einstein Charter School will follow procurement procedures as outlined in the Education Department General Administrative Regulations, CFR Part 74.44 whereby if the procurement is expected to exceed the small purchase threshold of Twenty Five Thousand Dollars (\$25,000.00) currently fixed by 41 U.S.C. 403(11), then such procurement over the small purchase threshold is subject to Bid Competition.

4. **Payables** are disbursed through the approved protocol of LaPorte CPAs by a three part protocol: (1) Approval of the expenditure or requisition by One (1) authorized individual (CEO or COO, or CAO) (2) Physically generating ("cutting") the physical check itself or electronically remitting payment by One(1) authorized individual; (3) Signing of the generated check by Two(2) authorized individuals. One authorized individual may participate in only Two (2) of the Three (3) procedures and cannot be a party to all three parts of the protocol. The Quickbooks computer generated checks are authorized for expenditures by the CEO or COO. The checks are generated using Quickbooks, by the COO or Business Manager. All checks require two signatures as per the above described protocol. Hard copy duplicates of all checks are retained and original expenditure requests, invoices, and packing slips (if applicable) are collected together per expenditure authorized and kept on file on site as backup to the Einstein Charter School Quickbooks file. All expenditures are recorded using Quickbooks and coded according to L.A.U.G.H./AFR codes.

a. **Credit Cards:** Visa & Sam's Club credit cards (Einstein Charter School) are authorized

and issued only to the CEO and Business Manager for school purchases as per protocol in (2) above.

i. Credit cards may be used for school related purchases only and their usage is monitored by the business office

ii. To facilitate accurate account reconciliation, credit card receipts are to be submitted to the finance office as soon as possible following a credit card transaction.

**b. Travel and Expense Reimbursement**

i. All travel is to be pre-approved by the CEO prior to departure.

ii. Meals are reimbursed at their actual cost, up to \$60 per meal. Alcohol costs are never reimbursed.

1. Meal receipts are to be submitted to the Finance Office when an employee returns from travel.

iii. Mileage is reimbursed at the federal rate established by the U.S. General Services Administration

1. An expense request form with an accompanying mileage report (Google Maps) listing driving distances is to be completed when an employee returns from travel.

5. **Other:** Einstein Charter School is an authorized Teachers Retirement System of Louisiana (TRSL) employer. For the Fiscal Year 2018-2019 the rates of employees (8%) and employer contributions (26.7%) are calculated based upon the employee gross salaries except custodial salaries as required by Louisiana law and our charter school contract and transmitted to TRSL by Quickbooks generated check. Breakdowns according to L.A.U.G.H./AFR codes are maintained by the Einstein Charter School Quickbooks file for fiscal reporting purposes to local, district, and Louisiana state requirements, as are payments

for unemployment, workers' compensation, group insurance, etc.

**ARTICLE IV: ACCOUNTING PROCEDURES AND BANK RECONCILIATIONS**

**Section 3.1 Procedures:** A Certified Public Accountant, performs monthly bank reconciliations and executes all monthly financial statements, income statements and balance sheets. The Business Manager or Finance Manager (or designee) provides all information and documents required by the School CPA in a timely manner and works in conjunction with and under the supervision of the School CPA to accomplish all accounting functions and procedures in accordance with generally accepted accounting principles utilizing the Einstein Charter School Quickbooks file. Under the supervision and guidance of the [EGH](#) certified public accountant the Finance Manager (or designee) and business office personnel perform the following:

1. Month and year end close
2. Compiles various financial/accounting schedules and documents, financial statements and analysis including budget to actual variance reports
3. General Ledger Activity
4. Prepares and posts journal entries
5. Maintains and files all cleared bank statements and checks and records
6. Performs other General Ledger Account Reconciliations as required by the OPSB system of internal controls
7. Assists in the preparation of schedules and work papers as needed for External Audit, the LDE Annual Financial Report (AFR)
8. Assists in continuing efforts to develop and implement strong Internal

Control policies and procedures and desk working procedures for all accounting functions

9. Assists with the preparation of the annual budget

10. Performs other duties as required by the EGI Board, CEO, and/or

Certified Public Accountant

**Section 3.2 Other:** The EGI Student Activity Fund bank reconciliation is performed both on site by the Senior Business Manager, CPAs and all records pertaining to that account are maintained at the school site.

#### **ARTICLE V: FIXED ASSETS**

Einstein Charter School maintains an inventory of all assets and has affixed a label to its inventory. Some equipment bears Recovery School District or Orleans Parish School Board tags and the Recovery School District or OPSB where appropriate maintains a separate record of equipment it owns.

#### **ARTICLE VI: SCHOOL BUILDING**

Einstein Charter School leases all facilities from the Louisiana State Department of Education or Orleans Parish School Board. All contracts must signed by the appropriate EGI authority.

#### **Article VII: Ethics:**

**I. Ethics:** The Einstein Group adheres to the Louisiana Code of Government Ethics as established by Louisiana Revised Statute 42:1111 – 1121.

**a.** If an employee suspects an ethics violation has taken place, they are to immediately report it to the CEO.

## **PROCUREMENT POLICY**

### **ARTICLE I:**

EGI will follow accounting policies and procedures that comply with generally accepted accounting principles (GAAP). Any procurement of goods and services shall be made by the Chief Executive Officer or designee, in the best interest of the school, upon considering the totality of the circumstances surrounding the procurement, which may include but not limited to price, quality, availability, timelines, reputation, and prior dealings.

### **ARTICLE II:**

EGI understands that the policy stated above applies to purchases made using non- federal funds. As a condition of the receipt of any federal funds, federal procurement requirements will apply. Specifically, EGI will follow procurement procedures as outlined in the Education Department General Administrative Regulations.

## ETHICS AND CONFLICT OF INTEREST POLICY

### ARTICLE I: PURPOSE

The purpose of this ethics and conflict of interest policy is to protect the Einstein Group, Inc.'s ("Einstein") interest when it is contemplating entering into a transaction or arrangement that might benefit the private interest of an Einstein employee, officer or trustee or might result in a possible excess benefit transaction. This policy is intended to supplement but not replace any applicable state and federal laws governing ethics and conflict of interest applicable to nonprofit and charitable organizations, including without limitations, the actions proscribed in Louisiana Revised Statute 42:1111, *et seq.*

### ARTICLE II: DEFINITIONS

**Section 2.1 Interested Person:** Any member of the Board of Trustees, principal officer, or member of a committee appointed by the Board of Trustees, specifically including the CEO, who has a direct or indirect financial interest, as defined below, is an interested person.

**Section 2.2 Financial Interest:** A person has a financial interest if the person has, directly or indirectly, through business, investment, or family:

2.2.1. An ownership or investment interest in any entity with which Einstein has a transaction or arrangement,

2.2.2. A compensation arrangement with Einstein or with any entity or individual with which the Einstein has a transaction or arrangement, or

2.2.3. A potential ownership or investment interest in, or compensation arrangement with, any entity or individual with which Einstein is negotiating a

transaction or arrangement. Compensation includes direct and indirect remuneration as well as gifts or favors that are not insubstantial. A financial interest is not necessarily a conflict of interest. Under Article III, Section 2, a person who has a financial interest may have a conflict of interest only if the Board of Trustee or committee decides that a conflict of interest exists.

### **ARTICLE III: PROCEDURES**

**Section 3.1 Duty to Disclose:** In connection with any actual or possible conflict of interest, an interested person must disclose the existence of their financial interest and be given the opportunity to disclose all material facts to the trustees and members of committees with governing board delegated powers considering the proposed transaction or arrangement.

**Section 3.2 Determining Whether a Conflict of Interest Exists:** After disclosure of the financial interest and all material facts, and after any discussion with the interested person, he/she shall leave the Board of Trustees or committee meeting while the determination of a conflict of interest is discussed and voted upon. The remaining Board or committee members shall decide if a conflict of interest exists.

#### **Section 3.3 Procedures for Addressing the Conflict of Interest:**

3.3.1. An interested person may make a presentation at the Board of Trustees or committee meeting, but after the presentation, he/she shall leave the meeting during the discussion of, and the vote on, the transaction or arrangement involving the possible conflict of interest.

3.3.2. The Chair of the Board of Trustees or committee shall, if appropriate, appoint a disinterested person or committee to investigate alternatives to the proposed transaction or arrangement.

3.3.3. After exercising due diligence, the Board of Trustees or committee shall determine whether Einstein can obtain with reasonable efforts a more advantageous transaction or arrangement from a person or entity that would not give rise to a conflict of interest.

3.3.4. If a more advantageous transaction or arrangement is not reasonably possible under circumstances not producing a conflict of interest, the Board of Trustees or committee shall determine by a majority vote of the disinterested members of the Board or committee whether the transaction or arrangement is in the Organization's best interest, for its own benefit, and whether it is fair and reasonable. In conformity with the above determination it shall make its decision as to whether to enter into the transaction or arrangement.

**Section 3.4 Violations of the Conflicts of Interest Policy:**

3.4.1. If the Board of Trustees or committee has reasonable cause to believe a member has failed to disclose actual or possible conflicts of interest, it shall inform the member of the basis for such belief and afford the member an opportunity to explain the alleged failure to disclosure.

3.4.2. If after hearing the member 's response and after making further investigation as warranted by the circumstances, the Board of Trustees or committee determines the member has failed to disclose an actual or possible conflict of interest, it shall take appropriate disciplinary and corrective action.

**ARTICLE IV: RECORDS OF PROCEEDINGS**

The minutes of the Board of Trustees and all committees with board delegated powers shall

contain:

**Section 4.1:** The names of the persons who disclosed or otherwise were found to have a financial interest in connection with an actual or possible conflict of interest, the nature of the financial interest, any action taken to determine whether a conflict of interest was present, and the Board of Trustee' 'or committee's decision as to whether a conflict of interest in fact existed.

**Section 4.2:** The names of Trustees who were present for discussions and votes relating to the transaction or arrangement, the content of the discussion, including any alternatives to the proposed transaction or arrangement, and a record of any votes taken in connection with the proceedings.

#### **ARTICLE V: COMPENSATION**

**Section 5.1:** No Member of the Einstein Board of Trustees may receive compensation either directly or indirectly from Einstein for their service on the Board of Trustees.

#### **ARTICLE VI: ANNUAL STATEMENTS**

Each member of the Board of Trustees, principal officer, other committee appointed by the Board of Trustees and CEO shall annually sign a statement, which affirms such person:

1. Has received a copy of the conflicts of interest policy,
2. Has read and understands the policy,
3. Has agreed to comply with the policy, and
4. Understands Einstein is charitable and in order to maintain its federal tax exemption it must engage primarily in activities that accomplish one or more of its tax-exempt purposes.

## **ARTICLE VII: ETHICAL CONDUCT**

The Charter School's trustees, officers and employees shall at all times be in compliance with the Louisiana Code of Ethics, ISA RS 42:1111, *et seq.*, including without limitation these supplemental provisions:

**Section 7.1:** The Board of Trustees shall conduct or direct the affairs of the School and exercise its powers subject to the applicable limitations of the Education Law, Not-for-Profit Corporation Law, the School's charter and its bylaws. The Board may delegate aspects of the management of school activities to others, so long as the affairs of the school are managed, and its powers are exercised, under the Board 's ultimate jurisdiction.

**Section 7.2:** No Trustee, officer, or employee of a for-profit corporation having a business relationship with the Charter School shall serve as voting member of the Board of Trustees for the duration of such business relationship, provided, however, that this provision shall not apply to the following:

7.2.1. Individuals associated with a partnership, limited liability corporation, or professional corporation including but not limited to doctors, accountants and attorneys;

7.2.2. Individuals associated with an educational entity (including but not limited to schools of education) some of whose faculty may be providing paid services directly or indirectly to such charter school;

7.2.3. Individuals associated with a bank, insurance, mutual fund, investment bank, stock brokerage, financial planning, or other financial services organization.

**Section 7.3:** In no instance shall a Trustee, officer, or employee of a for-profit educational management organization having a business relationship with the charter school

serve as a voting member of the Board of Trustees for the duration of such business relationship.

**Section 7.4:** Trustees shall avoid at all times engaging in activities that would appear to be unduly influenced by other persons who have a special interest in matters under consideration by the Board. If this occurs, a Trustee shall write a letter disclosing all known facts prior to participating in a Board discussion of these matters, and the Trustee's interest in the matter will be reflected in the Board minutes.

**Section 7.5:** Trustees shall make all appropriate financial disclosures whenever a grievance of conflict of interest is lodged against them.

**Section 7.6:** Trustees shall not use his or her position with the charter school to acquire any gift or privilege unless that gift is for the use of the charter school.

**Section 7.7:** Charter School Trustees, officers, or employees may never ask a subordinate, a student, or a parent of a student to work on or give to any political candidate.

**Section 7.8:** Trustees confirm their understanding that Einstein is a charitable not-for profit educational organization and that it will assure that Einstein maintain its federal tax exemption and engage primarily in activities that accomplish one or more of its tax-exempt purposes.

#### **ARTICLE VIII: PERIODIC REVIEWS**

To ensure the Einstein operates in a manner consistent with charitable purposes and does not engage in activities that could jeopardize its tax-exempt status, periodic reviews shall be conducted. The periodic reviews shall, at a minimum, include the following subjects:

**Section 8.1:** Whether compensation arrangements and benefits are reasonable, based on competent survey information, and the result of arm's length bargaining.

**Section 8.2:** Whether partnerships, joint ventures, and arrangements with management organizations conform to the Einstein's written policies, are properly recorded, reflect reasonable investment or payments for goods and services, further charitable purposes and do not result in impermissible private benefit or in an excess benefit transaction.

**ARTICLE IX: USE OF OUTSIDE EXPERTS**

When conducting the periodic review as provided for in Article 8, Einstein may, but need not, use outside advisors. If outside experts are used, their use shall not relieve the Board of Trustees of its responsibility for ensuring periodic reviews are conducted.

Approved by the Board of Directors of Einstein Group, Inc. on August 19, 2021

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Joe Rochelle

Secretary of the Board

**WHISTLEBLOWER POLICY**

The whistleblower policy is intended to provide a mechanism for the reporting of illegal activity or the misuse of The Einstein Group, Inc. (Einstein) assets while protecting the employees who make such reports from retaliation.

**ARTICLE I: QUESTIONABLE CONDUCT**

This policy is designed to address situations in which an employee suspects another employee has engaged in illegal acts or questionable conduct involving Einstein 's assets.

This conduct might include outright theft (of equipment or cash), fraudulent expense reports, misstatements of any accounts to any manager or to Einstein 's auditors, or even an employee's conflict of interest that results in financial harm to Einstein. Einstein encourages staff to report such questionable conduct and has established a system that allows them to do so anonymously.

## **ARTICLE II: MAKING A REPORT**

If an employee suspects illegal conduct or conduct involving misuse of Einstein assets or in violation of the law, he or she may report it, anonymously if the employee wishes, and will be protected against any form of harassment, intimidation, discrimination, or retaliation for making such a report in good faith.

Employees can make a report to any of the following Einstein executives at any time: chief executive, chief financial officer, or the chair of the Board of Directors. Einstein will promptly conduct an investigation into matters reported, keeping the informant's identity as confidential as possible consistent with our obligation to conduct a full and fair investigation.

Alternatively, employees can make a report by calling either the board chair or the chair of the audit committee. Their names and phone numbers are posted on Einstein's intranet.

## **ARTICLE III: NO RETALIATION**

An employee who has made a report of suspicious conduct and who subsequently believes he or she has been subjected to retaliation of any kind by any Einstein employee is directed to immediately report it to the chief executive, or the head of human resources as appropriate.

Reports of retaliation will be investigated promptly in a manner intended to protect confidentiality as much as practicable, consistent with a full and fair investigation. The party conducting the investigation will notify the employee of the results of the investigation.

Einstein strongly disapproves of and will not tolerate any form of retaliation against employees who report concerns in good faith regarding Einstein's operations. Any employee who engages in such retaliation will be subject to discipline up to and including termination.

#### **ARTICLE IV: EINSTEIN REPORTING PROCEDURES**

The "whistleblower" procedure is intended to describe the process through which concerns about the possible misuse of Einstein assets are handled pursuant to Einstein's whistleblower policy.

1. An employee makes a report of suspected misuse of Einstein assets by reporting in person to an Einstein executive, or reporting anonymously to the board chair or the finance committee chair.
2. The report is promptly reviewed by the chief executive or board chair to determine whether the report constitutes a complaint or a non-complaint, unless one of them is allegedly involved in the misconduct, in which case the report should be reviewed by only one of them. (If both of them are alleged to be involved, the report should go directly to the Governance and Finance Committee Chair.
  - A *complaint* means any report involving (i) questionable accounting, auditing, financial reporting, or internal controls; (ii) suspected fraud, theft, or improper use of company assets; (iii) a violation of Einstein's conflict-of-interest policy that results in a financial harm to Einstein; or (iv) a claim of retaliation against any employee making a good-faith report regarding any of the preceding matters.

- A *non-compliant* means a report of any other matter not involving a misuse of Einstein's assets.
3. If the report is deemed to be a complaint, it will be promptly investigated and forwarded to the Finance and Governance committee chair. If the report is deemed to be a non-compliant, it will be referred to the appropriate executive or manager for follow up. Some non-complaints may involve serious matters and may require prompt investigation, but may nevertheless not involve misuse of Einstein 's assets.
  4. Each complaint is fully investigated, and as far as possible handled so as to protect the privacy of the employee making the complaint. A written report of the outcome of each investigation is prepared and delivered to the finance committee chair.

The Finance and Governance committee chair decides whether the report involves a matter that is material. If it is deemed material, it is reviewed by the full committee, which may forward it for disposition to the board or may direct senior management to take actions to resolve the situation. If the report is deemed nonmaterial, it is not reviewed by the committee but is instead addressed by the Chief Operating Officer.

## **RECORDS MANAGEMENT POLICY**

### **ARTICLE I: DEFINITIONS**

**Section 1.1 Confidential Data:** Confidential Data is information protected by statutes, regulations, EGI policies or contractual language. Managers may also designate data as confidential. By way of illustration only, some examples of Confidential Data include:

- Medical records
- Student records and other non-public student data
- Social Security Numbers
- Personnel and/or payroll records
- Bank account numbers and other personal financial information
- Any data identified by government regulation to be treated as confidential, or sealed by order of a court of competent jurisdiction.

**Section 1.2 Confidential Records:** Records that contain confidential student or employee data that should have limited access and be protected from inadvertent disclosure.

**Section 1.3 Record:** Information that has been recorded on a storage medium and can be retrieved. A record may be a paper, electronic or microfilm document, photograph, blueprint, or audio or video recording.

### **ARTICLE II: RESPONSIBLE DEPARTMENT**

Each department bears the responsibility for retention and timely destruction of the particular types of records in their control.

### **ARTICLE III: POLICY STATEMENT**

EGI requires that its records be managed in a systematic and logical manner according to plans developed by the departments and consistent with applicable law. EGI requires that its records be maintained in a consistent and logical manner and be managed so that the school:

1. Meets legal standards for protection, storage and retrieval
2. Protects the privacy of faculty, staff and students as required by law
3. Optimizes the use of space
4. Minimizes the cost of record retention
5. Destroys outdated records in an appropriate manner

Departments that maintain school records are responsible for establishing appropriate records management procedures and practices. Each department 's administrative manager or a designee must:

1. Be familiar EGI's Records Management Policy
2. Develop the department's and/or office's record management procedures and practices, consistent with this policy
3. Educate staff within the department in understanding sound record management practices
4. Restrict access to confidential records and information
5. Coordinate the destruction of records as provided in the applicable departmental procedures

#### **ARTICLE IV: CONFIDENTIALITY REQUIREMENT**

Many records subject to record retention requirements contain non-public confidential data. Such records are protected by federal, state and local statutes. In addition to statutory requirements, any record that contains confidential data should be treated in

such a manner.

#### **ARTICLE V: ELECTRONICALLY STORED INFORMATION**

Recent years have witnessed a tremendous growth in the use of electronically stored information ("ESI") by the school. The ease with which ESI may be created, the number of places where ESI may be stored, and new rules regarding the use of ESI in litigation, all require that the school manage its ESI effectively, efficiently and consistent with its legal obligations. Accordingly, all departments must include ESI in the development of their records management plans.

#### **ARTICLE VI: PRESERVATION OF RECORDS RELEVANT TO LEGAL MATTERS**

Any record that is relevant to any pending or anticipated litigation, claim, audit, agency charge, investigation or enforcement action shall be retained at least until final resolution of the matter. In these circumstances, the [CEO or designee](#) will notify relevant departments and work with staff to identify and preserve any records (including electronic records) and other information that could be relevant to the matter. This will include a directive that the relevant unit 's normal document destruction policies or protocols temporarily be suspended. Employees who become aware that an investigation or legal proceeding has commenced or is anticipated against their department or unit promptly must notify the [CEO](#) so that all records with potential relevance to the investigation or legal proceeding can be preserved as necessary.

#### **ARTICLE VII: DISPOSAL AND DESTRUCTION OF RECORDS**

If you have determined that, consistent with the [EGI's Records Management Policy](#), and with the records management practices and procedures applicable to your department, it is appropriate to dispose of any records, they can be destroyed in one of the following

ways:

1. Recycle non-confidential paper records
2. Shred or otherwise render unreadable confidential paper records
3. Erase or destroy electronically stored data (Information Systems and Services can assist you in effectively disposing of this data)

If you have questions about your responsibilities, CEO or COO.

## **RECORD KEEPING POLICY**

All records will be kept in accordance with Louisiana and other applicable laws and regulations.

At a minimum Charter School Replication records will be kept for five years.

## **AUDIT POLICY**

EGI will undergo an annual A133 single audit.

## **STUDENT ADMISSION POLICY**

All students shall be admitted to any school located in Orleans Parish operated by the Einstein Group, Inc., exclusively in accordance with regulations from ENROLL/NOLA and One APP.

## **STUDENT FEES POLICY**

Any charges or fees assessed to students and/or families to participate in any activity operated by the Einstein Group, Inc. must receive prior written approval from the CEO before such fees or charges may be imposed.

## **PUBLIC FEES POLICY**

Fee charges to the public shall be approved by the CEO. Such fees include copying materials or facilities use.

## **SCHOOL FUNDRAISING POLICY**

### **ARTICLE I:**

All fundraising projects conducted by students and/or parents, the parent teacher organization, or and Einstein teacher/enrichment instructor shall be for the direct benefit of the students and shall contribute to the educational and extracurricular experiences of students. All fundraising projects must first be approved by the Principal or designee and then Executive Director of Strategy prior to starting.

### **ARTICLE II:**

Money derived from any school fundraising project or activity shall be handled, deposited and recorded according to the policies outlined above.

### **ARTICLE III:**

The determination of the fundraising projects and activities for school shall be the responsibility of the Principal, and shall conform to the following conditions:

1. Fundraising activities and projects shall be kept within a reasonable limit.

When presenting a fundraising idea to the Principal, students, parents and staff shall explain the need, propose, and how the funds may be expended.

2. All fundraising requests shall first be submitted to the Principal in writing.
3. All fundraising activities must ultimately be approved by the Executive Director of Strategy.

### **ARTICLE IV:**

Fundraising activities shall not adversely affect school-work and class time and shall adhere to all food service and safety requirement as designated by the COO.

## **INVENTORY AND PROPERTY MANAGEMENT POLICY**

### **ARTICLE I:**

The word "property" as used in this section means fixtures and other tangible personal property of a non-consumable nature the value of which is \$5,000 or more and the normal expected life of which is 5 years or more. These assets are posted in the record of capitalized property and depreciated over an estimated useful life rather than expenses in the year of acquisition.

### **ARTICLE II:**

On occasion, items may be acquired as a group of multiple components with the intention that the group of components will be used together for one purpose. In these cases the group of items, which meet the above definition of property, may be recorded in the property records as the group rather than individually. This group of assets then will be utilized, accounted for and depreciated as one item rather than as individual items.

### **ARTICLE III:**

The IT Manager shall be responsible for the care, custody, safekeeping and accounting of all school property. He/she may designate a School employee as the Property Clerk for the day-to-day management of School property and property records.

### **ARTICLE IV:**

Each item of property shall be marked or identified by each School.

### **ARTICLE V:**

The IT Manager or his/her designated representative shall:

1. Establish and maintain an adequate and accurate record of items of tangible personal property consisting of furniture, fixtures, equipment, audio-visual materials, and computer software having a value of five thousand dollars (\$5,000) or more.

2. See that a physical inventory of all such property is conducted annually by a person other than the custodian of the property. Any items or property which cannot be located or accounted for shall be reported to the Board of Directors for official action.
3. Serve as the disposal officer for surplus property in compliance with State Board of Education Rules.
4. Each school employee shall be responsible to take those measures necessary to properly safeguard property under his/her control against loss, damage, or undue depreciation and shall do what is necessary to insure the proper maintenance and safekeeping of the school property. The Principal shall also be responsible for initiating any requests for the use or disposal of school property. He/she shall be responsible for providing information pertaining to school property records. He/she shall report, when received, property acquired from sources other than the School funds such as from the parent organization and similar sources.
5. In the event the school incurs a loss or theft of property, a written report identifying specific property damaged or lost shall be submitted to the Principal. If theft is suspected, the loss must be reported to law enforcement authorities and an insurance claim be filed.
6. The Principal shall report to the Board any property that has been lost or stolen if not recovered within thirty (30) days after the discovery of the loss or theft except major losses shall be reported to the Board immediately. Such report shall include a recommendation that the property record be made inactive and any information applicable to personal liability shall also be reported.



**INVENTORY AND PROPERTY RECORDS FOR ITEMS PURCHASED  
WITH CHARTER SCHOOL PROGRAM (CSP) GRANT FUNDS**

**ARTICLE I:**

All equipment/inventory items with 600 series object codes that were purchased with CSP grant funds, regardless of individual unit cost, will be labeled as follows:

1. Property of (Insert School District Name)
2. (Insert) School Name
3. (Insert) Inventory ID/Serial Number
4. Purchased with Federal CSP Funds

**ARTICLE II:**

All CSP funded capital purchases of equipment/inventory items with 600 series object codes will be inventoried and labeled as stated above, regardless of individual unit cost. The school will maintain an inventory report for all CSP funded equipment/inventory items with 600 series object codes using the format provided by the Department of Education. The inventory report will be updated when new items are purchased, items are disposed/given a final disposition, and during each inventory.

## **CSP FUNDS POLICY**

Funds from the United States Department of Education Charter Schools Program will only be spent on allowable costs as defined by the United States Department of Education.

## **STUDENT WELLNESS POLICIES**

As a part of Einstein Charter School & Einstein Charter School Extension's commitment to student health and wellbeing, the school adopts the following wellness goals:

**Goal 1:** Promote good nutrition

**Goal 2:** Promote physical activity

**Goal 3:** Institute wellness leadership

**Goal 1:** Promote good nutrition

Einstein Charter School will:

1. Ensure that school breakfast and lunch foods meet or exceed the U.S. Department of Agriculture School Meal nutrition standards.
2. Exclusively provide students healthy food and beverage options beyond celebrations and PBIS rewards.
3. Provide adequate time to eat school meals (i.e. a minimum of 10 minutes for breakfast and 20 minutes for lunch).
4. Provide clean, unflavored and cool drinking water to students at no cost.
5. Prohibit the sale of sugar-sweetened beverage during the school day 4 days per week excluding flavored milk at lunch.
6. Ban marketing of less than healthy foods and beverages inside school buildings through any means, including counter advertisements, posters and other print materials.

**Goal 2:** Promote physical activity

Einstein Charter School will:

1. Prohibit students from opting out of participation in physical education , school activities, band, chorus, reserve officers' training corps, sports, or community volunteering, through issuance of waivers unless a student's I.E.P. so requires.
2. Ensure that equipment and facilities meet or exceed safety standards.
3. Ban the imposition of physical activity as a punishment.

**Goal 3: Institute wellness leadership**

Einstein Charter School will:

1. Implement a school community health group comprised of personnel, students, and any relevant community partners to plan activities aimed at wellness promotion.
2. Designate a school health coordinator responsible for coordinating school health activities.
3. Participate in the public policy process to highlight the need for community changes to address poor nutrition, inadequate physical activity and the obesity epidemic.
4. Provide training on school physical activity and nutrition policies.
5. Recruit adequately credentialed physical education coaches, health teachers, social workers and nurses.

## **NON-DISCRIMINATION POLICY**

It is the policy of Einstein that no applicant, client and/or employee of Einstein shall on the basis of Race, Gender, Religion, Creed, Color, National Origin, Political Affiliation, Sex, Sexual Orientation, Handicap, Age or any other non-merit factor, be excluded from participation in or be denied the benefits of, or otherwise subjected to discrimination under any program or activity, which Einstein operates or is applying for funding.

No person on the grounds of Race, Gender, Religion, Creed, Color, National Origin, Political Affiliation, Sex, Sexual Orientation, Handicap, or Age shall be subjected to discrimination, or be denied employment in connection with any program or activity receiving federal financial assistance.

No persons with responsibilities in the operation or administration of a program or activity because of Race, Religion, Creed, Color, National Origin, Sex, Political Affiliations, Disability or Age.

The following person has been designated to handle inquiries regarding the non-discrimination policies:

### **Title IX Coordinator**

Name: Ms. My Tran, Director Of Human Resources

Office Address: 4801 Maid Marion Drive, New Orleans, LA 70128

Office Phone Number: 504-503-0461

Email Address: [my\\_tran@einsteincharterschools.org](mailto:my_tran@einsteincharterschools.org)

## **STUDENT PRIVACY POLICY**

Einstein Group, Inc. values the privacy of all students and as such fully complies with all requirements flowing from Louisiana law on student privacy.