

FCC Guide
Scholarship
Compliance
Handbook
2025

Prayer (based on Eph 4:1-6): Lord God, help us to live in a manner worthy of the call you have placed in our hearts, a call to educate and form your children. Please bless us with all humility and gentleness, with patience, and with the ability to bear with one another through love. We ask that you help us to preserve the unity of the spirit through the bond of peace. Help us to truly be one body and one Spirit, believing in you, the one Lord, with one faith, through one baptism. We thank you, God and Father of all, who is overall and through all and in all, for the blessings you have given us. May we use these blessings for your honor and glory. Glory be to the Father and to the Son and to the Holy Spirit. As it was in the beginning is now and ever shall be world without end. Amen.

Scholarship Compliance for Florida's Private Schools

These comprehensive guidelines and references should be shared with everyone in the school who is involved with the compliance requirements of the state scholarships (other administrators, administrative assistants, bookkeepers, business managers, nurses, etc.).

There are many aspects of compliance when it comes to the state scholarship programs in Florida. This guide focuses on the various requirements and responsibilities of the school administrator.

- **Deadlines**
 - Annual Survey
 - Scholarship Compliance Form
 - Required Assessments
 - Audit
- **Documentation**
 - Why it is important
 - School Administration
 - School Staffing
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 - Student Records
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- **Communication**
 - Important Contact Information
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Deadlines

- **Ensure the school has access to the FLDOE website**
 - The principal should have login credentials:
https://www.floridaschoolchoice.org/login/login_private_school.asp
 - See the Update Notification Form in the Appendix (Page 15), if needed
- **February 1**
 - Scholarship Compliance Form
 - All compliance issues resolved by April 1
- **May 1**
 - Annual Private School Survey
- **August 15**
 - Norm Referenced Test Results
- **September 15**
 - Agreed Upon Procedures Audit

Annual Survey – Must be Submitted by May 1

Must be completed by all nonpublic schools. It is completed online. A copy is printed, dated, and notarized. It is mailed to the Florida Department of Education. It contains basic school information regarding: the school program, student count and demographics, teacher count, and high school graduate data. ****New last year**** Assurance of Compliance with FS. 553.865. By submitting the survey the school acknowledges compliance with: That restrooms are designated for exclusive use by males or females, or that there is a single occupant restroom;

- That changing facilities are designated for exclusive use by males or females, as defined by Section or that there is a single occupant changing facility;
- That the student code of conduct has been updated with disciplinary procedures for students that enter rooms for the opposite sex and refuse to leave
- That the private school has established procedures for employees that enter rooms for the opposite sex and refuse to leave; instructional personnel who do this commit a violation of the Principles of Professional Conduct for the Education Profession

A sample survey is in the appendix (Page 17).

Scholarship Compliance Form – Must be Submitted by February 1

All private schools receiving state scholarships must complete this form. It is completed online. A copy is printed, dated, and notarized. It is mailed to the Florida Department of Education. Specific documentation is required each year. When this document is submitted, the principal is stating that the school is in compliance with state requirements. Once the department has received the form and necessary documentation, it is reviewed and approved. The school will then receive a confirmation letter from the department, stating that the school is in compliance. If that letter is not received, in a timely manner, the principal should contact the FLDOE regional manager for more information. A sample form is in the appendix (Page 24)

Required Assessment

All private schools receiving state scholarships must either administer the state test or a test from the approved norm-referenced tests list to students in grades 3-10. Results must be given to parents. The score sheets (including name, testing date, and NPR) must be given to Learning Systems Institute by **August 15**.

Dr. Bodunrin Akinrinmade
Learning Systems Institute Florida State University
2010 Levy Avenue, Suite B 3200
Tallahassee, FL 32310
bakinrinmade@fsu.edu

Norm-Referenced Assessment

Below is the list of approved norm-referenced assessments, as of August 2024.

1. Comprehensive Testing Program (CTP)
2. Curriculum Associates – i-Ready Assessments
3. Educational Development Series (EDSERIES), Forms J and K
4. Iowa Assessments-Core Battery, Forms E, F, and G
5. Iowa Tests of Basic Skills (ITBS)-Core Battery, Forms A, B, and C
6. Iowa Tests of Basic Skills (ITBS)-Complete Battery, Form C
7. Iowa Tests of Educational Development® (ITED®), Form C
8. Kaufman Test of Educational Achievement Third Edition, Comprehensive Form (KTEA-III)
9. NWEA Measures of Academic Progress (MAP)
10. Pivot INSPECT Summative Assessment
11. PSAT 8/9
12. PSAT 10
13. PSAT/NMSQT®
14. SAT
15. PreACT Secure
16. ACT
17. Classic Learning Test (CLT3-8, CLT10, CLT)
18. Thrive Academics Performance Series (Developed by Scantron Corp)
19. Stanford Achievement Test, Tenth Edition (Stanford 10)
20. Renaissance Star Assessments (Early Literacy, Reading, Math)
21. TerraNova, Third Edition (TerraNova 3)
22. TerraNova NEXT
23. Edmentum Exact Path
24. Wide Range Achievement Test, Fourth Edition (WRAT4) and Fifth Edition (WRAT5)

See <https://www.fldoe.org/schools/school-choice/k-12-scholarship-programs/ftc/annual-assessment-requirement.stml> for the current listing.

Audit Required at \$250,000 Scholarship Funds – due September 15

Once a school receives \$250,000 or more in scholarship funds, it is required to have an audit completed by an independent CPA, using the agreed upon procedures. Full details are available: <https://www.stepupforstudents.org/schools-and-providers/agreed-upon-procedures/> (including slide decks and recordings).

The school addresses material exceptions and follows the plan to correct reportable exceptions. Three years of a similar reportable exception becomes a material exception. Material exceptions require a Corrective Action Plan from the school to the SFO. Material exceptions are sent to the Commissioner of Education by the SFO.

In general, the CPA will review the following areas.

- **School eligibility**
 - The FLDOE compliance letter demonstrates that the school is eligible for the program.
- **Adequate accounting system**
 - Accounting software information
- **Adequate system of financial controls**
 - Federally insured institution documentation: each year the school must demonstrate that its bank is insured by Bauer, Fitch, Moody, etc.
 - Bank reconciliation documentation completed on a regular basis
 - Non-education related expenses detailed
 - Shared expenses explained
 - Approved budget, regular reporting in the minutes of the board or finance committee
- **Adequate process for deposit and classification of scholarship funds**
 - Total number of scholarships and total dollar amounts
- **Properly expended scholarship funds for education-related expenses**
 - Education-related total vs. scholarship, providing proof that the school does not accept more funds than it needs for education related expenses
- **Other procedures**
 - Tuition & fee schedule, in general (what has been reported to the SFO and posted) compared to what is charged to students
 - School academic calendar, showing 180 days of school with at least 170 actual school days and 540 net instructional hours for students in kindergarten, 720 net instructional hours for students in grades 1-3, and 900 net instructional hours for students in grades 4-12.
 - Attendance policy and attendance records. The auditor will review at least 10 students' attendance records, checking to see if they are physically present in the school.

The auditor will review all financial documents in detail and meet with the bookkeeper. The above listing are the items that pertain more to the school administration and school policies. The Agreed Upon Procedures for the 2024-2025 and 2025-2026 FYs is in the appendix (Page 32).

Documentation – Why is it Important?

When the forms are completed, the person completing them must have the documentation to support it, including the required assessment data and the audit report. The state could ask for any documentation to be produced at any time. If the documentation is lacking or does not exist, this could be viewed as fraud. At that time, the school could lose scholarships and it could affect the diocese, as well. The principal or person signing the forms could then be put on the disqualification list, as well.

Scholarship Compliance – FLDOE letter or visit

When FLDOE receives a credible complaint or notice of investigations or arrests, the Office of Independent Education and Parental Choice (School Choice Office) sends a letter to the principal, similar to this: It has been brought to our attention that your school may be in violation of laws governing the state school choice scholarship programs. Pursuant to section 1002.421(2), Florida Statutes, if the department has reasonable cause to believe that a violation has occurred, **it shall conduct an inquiry** or make a referral to the appropriate agency for an investigation. As evidence of compliance with program requirements, please provide the following documents:

- A list of all owners, operators, and employees (teachers and other personnel) and their position titles;
- Results of current **FDLE Level 2 background screening** with any updates to arrest records for all owner's, operators, employee and contracted personnel;
- Results of **employment history checks**, including **educator screening tools**, for **each** of the personnel's or administrators' **previous employers**;
- Evidence (for each teacher) **at least one of the following**: (1) Three or more years of teaching experience; (2) A bachelor's degree or higher in any subject area; (3) or any special skills, knowledge, or expertise that serves as qualification to provide instruction in accordance with section; and
- Evidence that **notices regarding abuse and misconduct have been posted** at the school.

The school then has about two weeks to collect and submit all of this documentation. This is why it is important to have it ready at all times.

Leadership Succession Plan Template

A leadership succession plan template is in the appendix and available in the Resources Module of Accreditrac, as well as in the Elementary and Secondary School Manuals on www.eas-ed.org. A section for scholarship compliance is included. (Page 41)

Documentation for Scholarship Compliance Form

The next section of this guide relates to the specific sections of the scholarship compliance form and the documentation that is needed.

- **School Administration**
 - Handbook; Reporting

- Code of Ethics
- Hiring Process
- Employment History Verification
- **School Staffing**
 - Staff Files
 - Staff Spreadsheet
- **School Program**
 - Website/Handbook Checklist
 - Calendar & Attendance
- **Student Health, Safety, and Welfare**
 - Health Files
 - Posting in School
- **Student Records**
 - Student Files & Attendance Records
- **School Facility**
 - Facility Reports

School Administration

Information regarding compliance with background screening should be in staff handbooks. (All handbook statements should have diocesan approval.)

Reporting Incidents – Contact superintendent, immediately

All personnel have the duty to report abuse to DCF. Ensure that *diocesan protocols* are followed. In addition, professional practices, and the school choice office at the Florida department of education must be contacted:

- Arrest of staff member (on or off property), allegations under investigation – *diocesan protocols*, professional practices, school choice office
- Formal letter on official letterhead should be sent to Jacqueline Hitchcock, Jacqueline.Hitchcock@fldoe.org, with the following information:
 - The name of the employee and position title.
 - Did the school do an internal investigation, if so, what were the findings.
 - The date of the arrest, whether the employee was terminated, and a copy of the notification sent to the employee.
 - Whether the school notified PPS and, if so, provide the date of notification.

Code of Ethics for All Instructional Personnel, Education Support Personnel, and Administrators

Each school must have a code of ethics. (Each diocese has an approved Code of Ethics – use it and not the sample from the FLDOE.) Every staff member must sign it. It should be on the website, in some form. The Code of Ethics must include:

- Training requirement statement (and document the training)
- Duty to report abuse and misconduct
- Procedure to report misconduct

- Liability protection

Hiring Process

Before employing a person in **any position that allows direct contact** with students, does the school conduct employment history checks *of each of the person's previous employers*, screen the person through use of the educator screening tools, and document the findings in accordance with section 1002.421(1)(o), F.S.?

Employment History Verification

If the diocese has forms for this, use them. Obtain a list of all previous employers from the candidate/employee. Document attempts to contact the employer. Document review in educator screening tools for all employees with direct contact with students: BEC-PASS and Professional Practices. Document review of the Disqualification List for all staff members hired after June 1, 2022.

Staff Files

Ensure that documentation is available for every staff member, as described.

- **Anyone with direct contact with students no matter when they were hired**
 - Level 2 background screening results
 - History checks (previous hires must have something)
 - BEC-PASS documentation
 - Professional Practices documentation
- **All teachers no matter when they were hired**
 - Certificate, transcript, or letter from superintendent
- **Anyone hired after June 1, 2022**
 - Results from disqualification list

Up to Date Staff Spreadsheet

Ensure an up to date staff sheet is available with the following information.

- Name
- Date of Hire
- Specific Position
- Degree
- Certification
- Fingerprint
- Previous Employers Checked
- BEC-PASS
- Professional Practices
- Disqualification List
- Virtus/Protecting God's Children
- Catechist Certification

School Program

Website and/or Handbooks Checklist

The school website and/or parent handbook should include information about the following.

- Programs and services the school offers
- Nondiscrimination statement, as approved by the diocese
- Qualifications of classroom teachers: either the individual teacher's qualifications, such as degrees and certifications or a general statement about all teachers' qualifications
- Access to quarterly report cards (and/or access to SIS)
- Code of Ethics
- Duty of all employees to report abuse
- How to report abuse/educator misconduct
- Statement regarding school permanent closure or governance change (parents notified; files transferred)

Calendar & Attendance

Ensure the school calendar has one hundred eighty (180) days with a minimum of one hundred seventy (170) actual school days and the hourly equivalent of:

- Kindergarten: Five hundred forty (540) net instructional hours.
- Grades 1-3: Seven hundred twenty (720) net instructional hours.
- Grades 4-12: Nine hundred (900) net instructional hours.

Ensure the attendance policy provides a means for regular attendance for all students and is implemented the same for all students. Daily attendance must be documented. This must also be kept in the student permanent record. The school must also maintain an annual daily attendance log for entire student body.

Student Health, Safety and Welfare

Health Files

Student health files may be kept within the cumulative file or in a separate file. It must contain the following.

- **DH 3040** – maintain school entry health form
- **DH 680** – current immunization form
- **Scoliosis screening report** at grade six

Elementary schools must also complete the DH 684 – school report for kindergarten and grade seven.

Posting in school

- **Post in staff areas:** All employees duty to report abuse and procedure to do so
- 11 x 17 Posters in Large Print at Student Eye Level in English & Spanish
- Posters have been updated: <https://www.fldoe.org/teaching/professional-practices/reporting-misconduct-abuse.stml>

Student Records

Permanent record

The school must keep a permanent record for each child. It should include:

- Name
- Birthdate, place of birth
- Race, sex
- Address
- Parents' names
- Name and location of last school attended
- Date enrolled and date withdrawn/graduated, attendance information for each year
- Courses taken and grades

Cumulative files

The school must keep cumulative files. These may be electronic, paper, or a combination.

They must include:

- Copy of birth certificate (means of authenticating birthdate and parents)
- Health & immunization forms: DH 3080 and DH 680; scoliosis report for grade 6
- Report cards, interim reports
- TerraNova scores; Approved HS assessment scores
- Honors received
- Service plans
- Daily attendance

Attendance Records

As mentioned previously, the school must keep individual student attendance records in the cumulative and permanent files. The school must also keep a daily attendance log of the entire student body. This log must be kept according to diocesan record retention policies.

School Facility

Facility Reports

The school must maintain facility reports. These should be kept according to diocesan record retention policies.

- **DH 1777** Radon Measurement Report for non-exempt counties (initial report and second report five years later)
- **DH 4160** Sanitation Standards for K-12 Private Schools
- **Fire Department inspection report** (check: [SFM | Public School Fire Safety Report System \(bebr-app.com\)](#) to ensure a complete and accurate report has been filed)
- **Health Department inspection report** regarding food storage, preparation, and/or service
- Maintain **auto liability policy**

Communication

This section of the guide includes information about communicating with the various agencies involved with scholarship compliance in Florida.

- **Important Contact Information**
 - Florida Department of Education – manages scholarship compliance
 - Scholarship Funding Organizations – manages enrollment and payment
- **Community Relations Team at SUFS**
 - Listserv
 - Monthly Office Hours
- **Links & Acronyms**
 - More information, handbooks, recordings
- **Your Diocese and the Florida Catholic Conference**
 - Any question, new situation, unusual request, open inquiry

Scholarships Program Requirements are Managed by School Choice Office (Dept. of Ed.)

- **FLDOE Regional**

Regional Managers Map
Toll Free Hotline: 1-800-447-1636
www.floridaschoolchoice.org



Karla Hernandez
850-245-0064
Karla.Hernandez@fldoe.org

Alachua	Gadsden	Nassau
Baker	Gilchrist	Okaloosa
Bay	Gulf	Putnam
Bradford	Hamilton	Santa Rosa
Calhoun	Holmes	St. Johns
Clay	Jackson	Suwannee
Columbia	Jefferson	Taylor
Dixie	Lafayette	Union
Duval	Leon	Volusia
Escambia	Levy	Wakulla
Flagler	Liberty	Walton
Franklin	Madison	Washington



Jessi Edens
850-245-0872
Jessica.Edens@fldoe.org

Broward	Indian River
Charlotte	Lee
Collier	Martin
DeSoto	Monroe
Glades	Okeechobee
Hardee	Palm Beach
Henry	St. Lucie
Highlands	



Elsa Tejada
850-245-9564
elsa.tejada@fldoe.org
Miami - Dade



Maryanne Schlar
850-245-9298
Maryanne.Schlar@fldoe.org

Brevard	Orange	Sumter
Lake	Osceola	
Marion	Seminole	

New Scholarship Schools - 850-245-0902
Scott Earley
Scott.Earley@fldoe.org



Madison Selent
850-245-9455
Madison.Selent@fldoe.org

Citrus	Manatee	Polk
Hernando	Pasco	Sarasota
Hillsborough	Pinellas	

Compliance Supervisor—850-245-0650
Jackelyn Baldwin
jackelyn.baldwin@fldoe.org

Private School Line – 850-245-0877



- **Region 1**
 - Karla Hernandez
 - 850-245-0064
 - Karla.Hernandez@fldoe.org

- Region 2
 - Maryanne Schlar
 - 850-245-9298
 - Maryanne.Schlar@fldoe.org
- Region 3
 - Madison Selent
 - 850-245-9455
 - Madison.Selent@fldoe.org
- Region 4
 - Jessi Edens
 - 850-245-0872
 - Jessica.Edens@fldoe.org
- Region 5
 - Elsa Tejada
 - 850-245-9564
 - Elsa.tejada@fldoe.org
- **Open Inquiries**
 - Jacqueline Hitchcock
 - 850-245-0861
 - Jacqueline.Hitchcock@fldoe.org
- **Compliance Supervisor**
 - Jackelyn Baldwin
 - 850-245-0650
 - Jackelyn.Baldwin@fldoe.org

Contact Information for FLDOE Regional Managers

County	FLDOE Regional Mngr	FLDOE Email	FLDOE Phone
Alachua	Karla Hernandez	Karla.Hernandez@fldoe.org	850-245-0064
Bay	Karla Hernandez	Karla.Hernandez@fldoe.org	850-245-0064
Brevard	Maryanne Schlar	Maryanne.Schlar@fldoe.org	850-245-9145
Broward (North)	Jessi Edens	Jessica.Edens@fldoe.org	850-245-0872
Broward (South)	Jessi Edens	Jessica.Edens@fldoe.org	850-245-0872
Charlotte	Jessi Edens	Jessica.Edens@fldoe.org	850-245-0872
Citrus	Madison Selent	Madison.Selent@fldoe.org	850-245-9455
Clay	Karla Hernandez	Karla.Hernandez@fldoe.org	850-245-0064
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Marion	Maryanne Schlar	Maryanne.Schlar@fldoe.org	850-245-9145
Martin	Jessi Edens	Jessica.Edens@fldoe.org	850-245-0872
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Miami-Dade (Hialeah)	Elsa Tejada	elsa.tejada@fldoe.org	850-245-0650
Miami-Dade (South)	Elsa Tejada	elsa.tejada@fldoe.org	850-245-0650
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Seminole	Maryanne Schlar	Maryanne.Schlar@fldoe.org	850-245-9145
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St. Lucie	Jessi Edens	Jessica.Edens@fldoe.org	850-245-0872
Volusia	Karla Hernandez	Karla.Hernandez@fldoe.org	850-245-0064
Walton	Karla Hernandez	Karla.Hernandez@fldoe.org	850-245-0064

Scholarships – Student Enrollment and Payments are Managed by SUFS & AAA Scholarships

AAA Scholarships

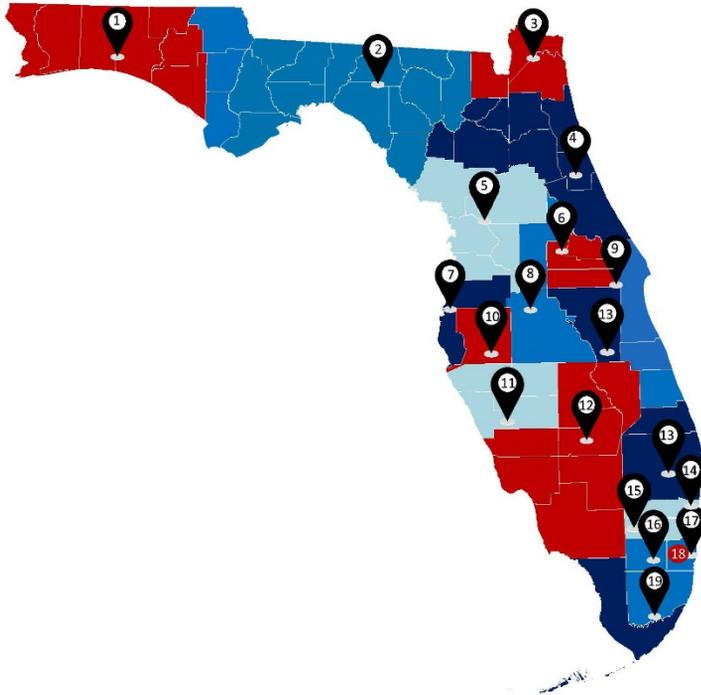
Kim Dyson, president

kim@AAAscholarships.org

888-707-2465



Community Relations REGIONAL MANAGER MAP



REGIONAL MANAGERS

- Region 1 – Pat Fidler
- Region 2 – Patrick McDermott
- Region 3 – Amanda McCook
- Region 4 – Lena O'Brien
- Region 5 – Laurie Baluyot
- Region 6 - Jonathan Cajigas
- Region 7 – Jalem Robinson
- Region 8 – Russell Hunt
- Region 9 – Ric Speigner
- Region 10 – Julisse Levy
- Region 11 – Kristin O'Brien
- Region 12 – Julie Richardson
- Region 13 – Carla Justamante
- Region 14 – Sacha Walker
- Region 15 – Gaby Citelli
- Region 16 – Kelly Valdivia
- Region 17 – Dina Damus
- Region 18 – Carla Hernandez
- Region 19 – Crisceli Acosta

Contact Information for SUFS Regional Managers

County	SUFS Regional Mngr	SUFS Email	SUFS Phone
Alachua	Laurie Baluyot	lbaluyot@sufs.org	904-746-0573
Bay	Pat Fidler	pfidler@sufs.org	904-595-6832
Brevard	Russell Hunt	rhunt@sufs.org	904-746-0575
Broward (North)	Gaby Citelli	mcitelli@sufs.org	904-352-2247
Broward (South)	Kelly Valdivia	kvaldivia@sufs.org	904-416-0660
Charlotte	Julie Richardson	jurichardson@sufs.org	727-451-9818
Citrus	Laurie Baluyot	lbaluyot@sufs.org	904-746-0573
Clay	Lena O'Brien	lobrien@sufs.org	904-746-0584
Collier	Sacha Walker	swalker@sufs.org	239-777-6565
Columbia	Patrick McDermott	pmcdermott@sufs.org	904-746-0583
Duval	Amanda McCook	amccook@sufs.org	904-479-3965
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Miami-Dade (Hialeah)	Dina Damus	ddamus@sufs.org	904-352-2243
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Polk	Kristin O'Brien	kobrien@sufs.org	904-746-0572
Santa Rosa	Pat Fidler	pfidler@sufs.org	904-595-6832
Sarasota	Julie Richardson	jurichardson@sufs.org	727-451-9818
Seminole	Jalem Robinson	jarobinson@sufs.org	904-746-0588
St. Johns	Lena O'Brien	lobrien@sufs.org	904-746-0584
St. Lucie	Carla Justamante	cjustamante@sufs.org	727-451-9851
Volusia	Russell Hunt	rhunt@sufs.org	904-746-0575
Walton	Pat Fidler	pfidler@sufs.org	904-595-6832

Community Relations Team at SUFS

The Community Relations Team at SUFS sends out reminder emails and invitations on a regular basis. Ensure administration is on the listserv. Email cx@sufs.org for more information. At least one administrator should be [signed up for text alerts for schools](#) from SUFS. Someone from the school should [participate in the Monthly Office Hours](#).

Links & Acronyms

Scholarship Compliance Links

SUFS Handbooks: <https://www.stepupforstudents.org/schools-and-providers/#provider-handbooks>

SUFS Community Relations: [Schools - Community Relations \(sufs.org\)](#)

[Register for Community Relations Office Hours](#)

Scholarship Acronyms

AAA	AAA Scholarship (Scholarship Funding Organization)
SFO	Scholarship Funding Organization
FLDOE	Florida Department of Education
SUFS	Step Up For Students (Scholarship Funding Organization)
FES-EO	Family Empowerment Scholarship – Educational Options
FES-UA	Family Empowerment Scholarship – Unique Abilities
FTC	Florida Tax Credit Scholarship
AUP	Agreed Upon Procedures Audit
FCC	Florida Catholic Conference
EMA	Step Up For Students’ platform

Always Contact the Superintendent

The diocesan superintendent has information and can assist the administration in all areas of scholarship compliance. Always contact him or her when there are compliance questions, funding questions, a new situation, an open inquiry, and most especially, if there is a question about reporting misconduct.

The FCC accreditation office has information and can assist, as well. If more information is needed or assistance at the state level, contact our office.

Mary Camp, associate director for accreditation

mcamp@flacathconf.org

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