

OVERSIGHT, EVALUATION & INTERVENTION POLICY

Oversight Transparency

The Sponsor shall ensure that its oversight and evaluation processes are transparent, and shall share with each school that it sponsors how the Sponsor intends to monitor the school's academic, operational, and financial performance. To encourage transparency, the Sponsor will proactively communicate the processes, including timelines, as well as any changes to processes to schools. The timing for reporting and performance of oversight depends on the type of review and is delineated below.

Enrollment and Financial Reviews

On a monthly basis the Sponsor shall conduct enrollment and financial reviews. Specific procedures for how enrollment and financial reviews will be conducted consistent with this policy shall be established.

Financial reviews will include budget ledgers, transactional detail reports, and at least one review of the five-year forecast. The Sponsor shall provide feedback to each of its schools after a financial review. If a financial review indicates an area of financial concern, including but not limited to enrollment, revenue, and expense fluctuations, the Sponsor shall provide the sponsored school's governing authority with a proactive recommendation to achieve greater efficiencies regarding the school's financial and enrollment decision making.

Enrollment reviews will include a monthly assessment of the number of students enrolled during that time. Review of samples of a school's monthly residency verifications will be a part of the monthly enrollment report. The Sponsor shall provide feedback after each enrollment review.

Enrollment and financial reviews may be used as an opportunity to provide proactive technical assistance, reporting and monitoring of the school's finances and compliance with written feedback.

Onsite Reviews

The Sponsor will conduct at least two onsite reviews while school is in session, with one during the first half of the school year and one during the second half of the school year. Onsite reviews will be used to examine a school's compliance with applicable laws, rules, contractual obligations, and academic performance measures. An onsite review will include data from at least three (3) of the following stakeholder groups: the governing authority members, administrators, teachers, instructors, staff, management company staff if any, students, parents, or other stakeholders. Onsite reviews shall also require at least one interview to be conducted with an administrator and a teacher, respectively.

Observations and interviews shall be conducted at each site visit. Guidance as to interviews and observations will be provided to the staff conducting the site visits. Provisions in the Community School Contract and the Performance Standards shall be used and assessed at each review.

The Sponsor shall establish procedures and protocols for conducting onsite reviews.

After each onsite review, the Sponsor shall provide the reviewed school with a written onsite visit report that includes at least: (1) the information collected during the visit; (2) a summary of the Sponsor's findings, which shall include the school's compliance with laws, rules, contractual terms, and the school's progress towards academic performance measures; (3) the school's strengths and areas needing improvement; and (4) the specific steps or timeframes for a sponsored school to take appropriate actions to improve. For each area of improvement identified, the Sponsor shall provide the school with steps and timeframes to make the

improvements and request and review status updates regarding the school's improvement efforts.

Performance Monitoring

The Sponsor shall review a school's academic, financial and organizational/operational performance annually by collecting data for multiple years related to all applicable contractual, academic, financial, and organizational/operational measures. The Sponsor shall also analyze the data collected against contractual targets specified in the school's performance framework and evaluate the overall performance of the sponsored school based on the outcomes of multiple year's of data analysis and evaluation and the majority of sponsored schools. This analysis and evaluation shall determine subsequent actions required of the sponsored school.

Performance Reports

On an annual basis, the Sponsor shall provide a cumulative performance report to each school it sponsors. The performance report shall summarize the school's fiscal, operational/ organizational, and academic performance. The performance report shall also identify the sponsored school's areas of strength and areas where there is a need for improvement. This report shall relate the sponsored school's performance and compare the school's performance against the performance framework in the contract, and shall include multiple years of performance data. The performance report shall be discussed with the governing authority of the sponsor school, and the Sponsor will summarize performance over the contract term and state the sponsored school's prospects for renewal.

Intervention

The Sponsor may intervene in a sponsored school's operation for certain material reasons as outlined in Ohio law (R.C. 3314.023(E)) and in the school's contract. Interventions may include, but is are limited to, placing a school on a corrective action plan (CAP) or performance improvement plan (PIP), placing a school on probation, suspending operations of a school, assuming operations of a school, non-renewing a school's contract, or terminating a school's contract.

The sponsor may take informal steps to intervene where, in the Sponsor's discretion, a school has demonstrated "non-material" conditions or violations that require remedy, but can be resolved through open dialogue with the school or through a corrective action plan.

Material conditions that may trigger an intervention and/or corrective actions from the Sponsor include, but are not limited to:

- Violation of the material terms of the Sponsor Contract
- Violation of federal, state, or local laws
- Low or declining academic performance or a failure to meet academic performance standards
- Failure to meet indicators of financial viability or sustainability, mismanagement of public dollars, or financial malfeasance
- Deviation from the education, management, administration, or financial plan(s)
- Threats to the health, safety, or welfare of students, or a failure to secure and retain adequate school facilities
- Failure to meet standards for fiscal management, including failures to correct audit findings or material weaknesses
- Failure to meet state reporting deadlines or inaccurate reporting to the state that is material or cannot be corrected

- Failure to retain sufficient enrollment to remain financially viable
- Substantiated complaints against the School or failure to report conditions that may have a material impact on the School
- Substantiated ethics or conflicts violations, or substantiated violations of Sunshine laws

In most instances, the Sponsor will identify conditions that may trigger interventions through its technical assistances to a school, or after conducting an onsite visit or monthly academic, financial or enrollment review. However, the Sponsor encourages schools to openly dialogue with the Sponsor where a material issue may arise so that the Sponsor can proactively assist the school, if possible, through technical assistance.

The Sponsor shall investigate the conditions that may trigger formal interventions, which shall include evaluating the identified condition, if applicable, verifying the condition, and communicating about the condition with the School, if reasonable. The investigation process will be documented.

Steps and Intervention Action

The Sponsor seeks to utilize corrective action and technical assistance wherever practical in lieu of any permanent intervention measures, except for situations where the severity of the offense, violation, or failure warrants initiating a permanent intervention. Accordingly, when practicable, the Sponsor will utilize a progressive intervention plan.

<p>Step 1: Concern</p>	<p>Conditions that may trigger Status:</p> <p>Low or declining academic performance or expected failure to meet academic performance standards</p> <p>Some violations of federal/state/local laws</p> <p>Issues identified in site visits.</p> <p>Consequences:</p> <p>Notification to the School’s Administrator and Board President.</p> <p>School proposes method for Resolution.</p> <p>Sponsor creates a timeline for improvement.</p>
<p>Step 2: Notice of Breach</p>	<p>Conditions that may trigger Status:</p> <p>Unresolved Step 1 issues.</p> <p>Consequences:</p> <p>Written notification to the Governing Authority and the School’s Administrator and requirement that School prepare a CAP.</p> <p>School proposes CAP.</p>

	<p>Sponsor creates a timeline for improvement.</p> <p>Additional site visits to affirm correction of problem, if necessary.</p>
Step 3: Probation	<p>Conditions that may trigger Status:</p> <p>Unresolved Step 1 or 2 issues.</p> <p>Conditions identified above.</p> <p>Grounds specified in O.R.C. 3314.07.</p> <p>Consequences:</p> <p>Sponsor places School on probationary status pursuant to O.R.C. 3314.073, monitors progress and corrections.</p>
Step 4: Suspension of Operation or Assuming Operation	<p>Conditions that may trigger Status:</p> <p>Unresolved Step 1, 2, or 3 issues.</p> <p>Conditions identified above.</p> <p>Grounds specified in O.R.C. 3314.07.</p> <p>Review of plan to address pursuant to intent to suspend due process procedures, deficiencies, timeframes, benchmarks and decision as to whether to suspend.</p> <p>Consequences:</p> <p>Sponsor suspends operation of the School pursuant to due process procedures in O.R.C. 3314.072.</p>
Step 5: Termination	<p>Conditions that may trigger Status:</p> <p>Unresolved step 1, 2, 3 or 4 issues.</p> <p>Conditions identified above</p> <p>Grounds specified in O.R.C. 3314.07.</p> <p>Consequences:</p> <p>Sponsor terminates the Sponsor Contract pursuant to O.R.C. 3314.07</p>

Timeframes for Monitoring and Measuring Progress and Deadlines for Resolving a Deficiency

The Sponsor shall establish reasonable deadlines and timeframes, except where statutory deadlines exist, for achieving progress and resolving any material deficiency. The Sponsor recognizes that timeframes and deadlines will vary depending on the deficiency and that no policy can foresee nor predict what constitutes a reasonable timeframe for making progress or resolving certain types of deficiencies. The Sponsor shall request and review status updates from the School regarding its progress in resolving or not resolving the deficiency and document progress or lack thereof.

Consequences for Not Resolving the Deficiency

Consistent with the progressive interventions described above, the School's failure to resolve a deficiency may result in subsequent step.

Probation

In lieu of termination of the Sponsor Contract or suspension of the operation of the School, after consultation with the Governing Authority, if the Sponsor finds that any of the conditions prescribed in division (B)(1) of section 3314.07 of the Revised Code apply to the School, the Sponsor may declare in written notice to the Governing Authority that the School is in a probationary status which shall not extend beyond the end of the current school year. The notice shall specify the conditions that warrant probationary status. The Sponsor may declare the School to be in such status only if it has received from the Governing Authority reasonable assurances to the Sponsor's satisfaction that the Governing Authority can and will take actions necessary to remedy the conditions that have warranted such probationary status. The Sponsor shall monitor the actions taken by the Governing Authority to remedy the conditions that have warranted probationary status, and the Sponsor may take over the operation of the School as provided in the Sponsor Contract, may take steps to terminate the Sponsor Contract, or may take steps to suspend the operation of the School, if the Sponsor at any time finds that the Governing Authority is no longer able or willing to remedy those conditions to the Sponsor's satisfaction.

Suspension

The Sponsor may suspend the operation of the School only if it first issues to the Governing Authority notice of the Sponsor's intent to suspend the operation of the Sponsor Contract. Such notice shall explain the reasons for the intent to suspend operation of the Sponsor Contract and shall provide the School's Governing Authority with five (5) business days to submit to the Sponsor a proposal to remedy the conditions cited.

The Sponsor shall promptly review any proposed remedy timely submitted by the Governing Authority and shall either approve or disapprove the proposed remedy. If the Sponsor disapproves the proposed remedy, the Governing Authority fails to submit a proposed remedy in the manner prescribed, or if the Governing Authority fails to implement the remedy as approved by the Sponsor, the Sponsor may proceed with suspension as set forth below.

If the Sponsor decides to suspend the operation of the School, the Sponsor shall promptly send written notice to the Governing Authority stating that the operation of the School is immediately suspended. The written notice shall contain specific reasons for the suspension and shall state that the Governing Authority has five (5) business days to submit a proposed remedy to the conditions cited as reasons for the suspension or face potential Sponsor Contract termination. Upon receipt of the notice of suspension, the Governing Authority shall immediately notify the employees of the School and the parents of the students enrolled in the School of the suspension and its reasons and shall cease all school operations on the next business day.

Termination

Please refer to the Sponsor's Termination Policy.

Quality Practices Rubric: D.01 – Oversight Transparency; D.02 – Enrollment and Financial Reviews; D.03 – Onsite Visits; D.04 – Site Visit Reports; D.05 – Performance Monitoring; D.06 – Intervention; D.07 – Annual Performance Reports

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