



## **CORRECTIVE ACTION PLAN PROCESS**

**EFFECTIVE DATE:** 07/01/2013

**SOP 3.9**

**SIGNATURE**

A handwritten signature in black ink, appearing to be "J. P. [unclear]", written over a horizontal line.

**PROPOSED BY** General Counsel

### **PURPOSE**

This CORRECTIVE ACTION PLAN PROCESS provides guidance to all team members and the Management Team on how to communicate, evaluate and track corrective action plans regarding any deficiency in the school's governance, operations, fiscal management, educational model or operations relative to any state or federal rule or law, and/or sponsor requirements. This includes deficiencies brought to the attention of CSS by stakeholders, such as the Ohio Department of Education or Auditor of State's Office, which may include audits; programmatic deficiencies, grant and data reporting; or other pertinent issues relative to the school's operations.

The CORRECTIVE ACTION PLAN PROCESS relates to any deficiency requiring a request for a corrective action plan for a school.

### **SCOPE**

This CORRECTIVE ACTION PLAN PROCESS applies to all staff who participate in oversight or provide technical assistance to CSS partner schools sponsored by St. Aloysius.

### **PROCEDURE**

The CSS CORRECTIVE ACTION PLAN PROCESS is as follows:

1. Conditions that may trigger intervention and corrective action include, but are not limited to:
  - i. Violation of rule and/or law
  - ii. Violation of community school contract
  - iii. Excessive decrease in enrollment
  - iv. Financial instability



- v. Failure to respond to reasonable requests from sponsor
  - vi. Performance deficiencies, such as failure to make adequate academic progress or meet the local report card measures
2. CSS staff member may identify a condition that triggers the potential need for a corrective action plan during an enrollment and financial review, on-site visit, preparation of site visit reports and/or while conducting annual performance monitoring.
3. CSS staff member may also note a condition that may trigger intervention and the potential need for a corrective action plan during a review of the following documentation:
  - a. Enrollment and financial review documents
  - b. Communication from the Ohio Department of Education or other stakeholders (i.e. Auditor of State)
  - c. Site Visit Reports
  - d. Audit Reports
  - e. Governing Authority Meeting Reports
  - f. Complaints
4. When the CSS staff member notes a potential deficiency, he/she will discuss with their department manager to determine if the deficiency should be investigated.
5. Department manager or designated CSS staff member may conduct an investigation, which may include: contacting school personnel, governing authority members, management company representatives, governing authority legal counsel, verbal conversations, email correspondence and document collection.
6. After completion of the investigation, department manager discusses the deficiency with President.
7. President makes the determination if a request for a corrective action plan should be sent to the school.
8. Within five (5) business days of determining that a CAP should be sent, the department manager/CSS staff member will complete the CAP Request Form Letter and obtain the President's approval of the letter. The letter shall include specific language and timeline for submission of CAP.
9. The department manager shall send the approved CAP Request Form Letter to Education Programs Assistant.
10. After receipt of the CAP, the Education Programs Assistant shall send the letter electronically to all governing authority members with copy to governing authority counsel, school leader, management company representative (if applicable), CSS President, CSS Management Team, and Office Manager for distribution prior to next governing authority meeting.
11. Once the letter has been sent, the following takes place:
  - a. The School shall provide its corrective action plan within five (5) business days after the upcoming governing authority meeting.
  - b. A Legal Department designee updates the corrective action plan tracking spreadsheet with date sent, reason and due date for response.
  - c. The Legal Department monitors the corrective action due date.
    - i. If the corrective action plan is not received by the due date:
      1. General Counsel or designee shall decide if the school shall be given more time to respond.



2. If the school fails to respond, the Legal Department and President discuss the next course of action, which may include probation, suspension or termination.
  3. If it is determined to be probation, suspension or termination, the probation, suspension or termination process shall begin. (See Probation and Suspension Process, Termination Process).
12. Within ten (10) business days of receiving the CAP from the governing authority the following shall take place:
- a. The Education Programs Assistant shall forward the CAP to the appropriate department manager and CSS staff member for sufficiency review.
  - b. The department manager shall notify the Education Programs Assistance if the CAP has adequately addressed all deficiencies.
    - i. If the CAP has adequately addressed all deficiencies, the Education Programs Assistant shall send notice to the governing authority of approval and the monitoring protocol if required.
    - ii. If the CAP has not adequately addressed all deficiencies the department manager or CSS staff member shall provide language and information to assist the school in making the CAP sufficient to the Education Programs Assistant.
      1. The Education Programs Assistant shall complete the CAP Denial Response Form Letter and send it to the governing authority.
13. If the Governing Authority does not provide a sufficient CAP after two (2) requests:
- a. The Legal Department can request additional information to be provided within five (5) business days.
  - b. Upon receipt of additional information, repeat step 10.
  - c. If additional information does not adequately address all deficiencies, General Counsel shall discuss with the President to determine the consequences for not resolving the deficiency. The consequences may include: probation, suspension, termination.
  - d. General Counsel or designee shall communicate next steps to the school within ten (10) business days.
14. Departments are responsible for adding CAPs to monthly department meeting agendas for review.

## **DOCUMENTATION/VERIFICATION**

*Location of documentation:*

S:\Corrective Action Plans\SY

*Naming convention:* Include the school name, document description and date of document

Ex: Broadway - CAP Approval - 12.14.18

*Supporting documentation included with this process:*

1. CAP Request Form Letter
2. CAP Approval Response Form Letter



3. CAP Denial Response Form Letter
4. Example CAP tracking sheet

### **DOCUMENT HISTORY**

Orig. Date 2011  
Rev. May 2012  
Rev. November 2012  
Rev. December 2014  
Rev. October 2015  
Rev. March 2017  
Rev. March 2018  
Rev. October 2018  
Rev. May 2019

### **REVIEW AND APPROVAL**

Reviewers of the CORRECTIVE ACTION PLAN PROCESS are as follows:

Reviewed by: <u>Management Team:</u>	Date: 06/18/2019
Approved by: <u>President David L. Cash, Jr.</u>	Date: 06/18/2019

The effective date is as of the date signed above. Processes are consistently reviewed and revised as necessary throughout the term. The CORRECTIVE ACTION PLAN PROCESS may be implemented as currently written and will be formally evaluated and revised as necessary going forward.