



## **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]".

**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 members 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, the department manager discusses the deficiency with the 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 the Legal Department.
10. After receipt of the CAP, the Legal Department 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 the next governing authority meeting.
11. Once the letter has been sent, the following takes place:
  - a. A Legal Department designee updates the corrective action plan tracking spreadsheet with date sent, reason and due date for response.
  - b. The School shall provide its corrective action plan within five (5) business days after the upcoming governing authority meeting.
  - c. The Legal Department monitors the corrective action due date.
    - i. If the corrective action plan is not received by the due date:
      1. Legal Project Manager shall follow-up with the Department Manager to decide if the school shall be given more time to respond.



2. If the school fails to respond, the Legal Department or Department Manager 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 Legal Department shall forward the CAP to the appropriate department manager and CSS staff member for sufficiency review.
  - b. The department manager shall notify the Legal Department if the CAP has adequately addressed all deficiencies.
    - i. If the CAP has adequately addressed all deficiencies, the Department Manager will draft the approval letter and include the monitoring protocol, if required. The approval letter will be sent to the Legal Department to distribute.
    - ii. If the CAP has not adequately addressed all deficiencies the department manager or CSS staff member shall draft a letter asking for additional information with a specific timeline for submission.
      1. The Legal Department shall send the CAP Denial Response Form Letter to the governing authority.
13. If the Governing Authority does not provide a sufficient CAP after two (2) requests:
- a. The Department Manager 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, the Department Manager 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

*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. Date May 2012  
Rev. Date November 2012  
Rev. Date December 2014  
Rev. Date October 2015  
Rev. Date March 2017  
Rev. Date March 2018  
Rev. Date October 2018  
Rev. Date May 2019  
Rev. Date April 2020

## **REVIEW AND APPROVAL**

Reviewers of the CORRECTIVE ACTION PLAN PROCESS are as follows:

Reviewed by: Management Team: Date: 05/06/2020  
Approved by: President David L. Cash, Jr. Date: 06/29/2020

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.