



CORRECTIVE ACTION PLAN PROCESS

EFFECTIVE DATE: 07/01/2013

SOP 3.9

SIGNATURE

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 identified during the comprehensive onsite review process. .

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



- vii. Performance of the governing authority or its individual members that is detrimental to the overall success of the school. Issues identified in the annual audit performed by the Auditor of State, or Independent Public Accountants (IPAs), that may impact the operation of the school.
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, governing authority meetings, 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 managers or designated CSS staff members 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. President or designee shall contact the school and notify them that a CAP will be forthcoming.
9. Within five (5) business days of determining that a CAP should be sent, the department manager/CSS staff member will complete the Corrective Action Plan Template and obtain the President's approval. The template shall include specific language and time for submission of the CAP. .
10. The Legal Project Manager shall draft the Corrective Action Plan Cover Letter..
11. After receipt of the CAP template, the Legal Project Manager shall send the cover letter and corrective action plan 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.
12. Once the letter has been sent, the following takes place:
 - a. The Legal Project Manager will update the corrective action plan tracking spreadsheet with the date sent, reason for CAP and the due date of the response.
 - i. The Legal Project Manager will share this spreadsheet at all Staff Meetings to update staff on the CAP status of each school.
 - b. The Legal Project Manager will monitor the CAP due dates and communicate directly with the governing authority or its representative as needed.
 - c. Upon receipt of the corrective action plan, the Legal Project Manager will forward it to the appropriate department manager to review the plan.



- d. If the department manager requires additional information, he/she will state specifically what is needed and the Legal Project Manager will send the Request for Additional Information for letter and continue to monitor the CAP and the due date. If the plan is approved, the Legal Project Manager will send the Corrective Action Plan release letter and update the CAP monitoring spreadsheet with the date resolved.
13. If the requirements of the CAP are not being met, the following may occur:
- a. The matter may be referred to the General Counsel for placement on probation (SOP 2.4) or suspension (SOP 2.5).
 - b. The matter may be referred to the General Counsel for contract termination (SOP 2.6).
14. Departments are responsible for adding CAPs to monthly department meeting agendas for review.

DOCUMENTATION/VERIFICATION

Location of documentation:

S:\Corrective Action Plans\SY

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
Rev. Date November 2020
Rev. Date April 2021

REVIEW AND APPROVAL

Reviewers of the CORRECTIVE ACTION PLAN PROCESS are as follows:

Reviewed by: Management Team:

Date: 05/04/2021

Approved by: President David L. Cash, Jr.

Date: 05/11/2021



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.