



STANDARD OPERATING PROCEDURE 2.6

PROCEDURE TITLE: Community School Termination & Non-Renewal Process

Department: Legal Department

Proposed by: VP Sponsorship Operations

Effective Date: 01/30/2013

PURPOSE

The COMMUNITY SCHOOL TERMINATION & NON-RENEWAL PROCESS ensures that all necessary notifications and closure requirements are met by the deadlines established by the sponsor, rule and law, and the Ohio Department of Education. In addition, the process monitors the performance of the applicant through the RENEWAL SCHOOL APPLICATION AND REVIEWER PROTOCOL PROCESS. The process also ensures that, if a terminated or non-renewed school does not close but rather is awarded a contract by ODE or a different sponsor, all requirements of the non-renewing sponsor are documented, submitted and retained as required.

SCOPE

The COMMUNITY SCHOOL TERMINATION & NON-RENEWAL PROCESS is used to guide all schools from the point of a non-renewal or termination decision through to closure and applies to all staff involved in the termination and non-renewal process.

PROCEDURE

1. The COMMUNITY SCHOOL TERMINATION & NON-RENEWAL PROCESS may begin with the RENEWAL SCHOOL APPLICATION AND REVIEWER PROTOCOL PROCESS, which includes evaluation of the application and a high stakes review of the academic, financial, and operational/organizational data over the term of the charter contract.
 - a. If the school does not meet the criteria for renewal as listed in its contract, the school will be non-renewed.
2. The process may also begin with an evaluation of concerns reviewed by the CSS Management Team.



3. Conditions that may trigger consideration of termination include but are not limited to: failure to meet student performance requirements stated in the contract; failure to meet generally accepted standards of fiscal management; violation of any provision of the contract or applicable state or federal law; other good cause.
4. Internal staff will collect data relative to the condition(s) listed in step 4 that triggered consideration of termination. This data includes data from the performance framework of the charter contract which may include the following: academic data from the local report card or nationally normed assessments related to student performance requirements stated in the contract, financial statements related to meeting generally accepted standards of fiscal management, and compliance data related to the provision of the contract or law the school has violated.
5. Additionally, internal staff will contact the school leader, management company representative (if applicable), governing authority counsel, governing authority president and any other personnel related to the issues reported.
6. Analysis of the data is conducted internally and presented to St. Aloysius by the President or other key staff for a final determination. The St. Aloysius Board reviews the findings and recommendations of CSS and makes a decision to non-renew or terminate the school.
7. Once a decision is made to non-renew or terminate, the notice of non-renewal or termination letter is sent from the Legal Department on behalf of St. Aloysius.
 - a. Notices of non-renewal will be sent, in writing, no later than January 15th of the year in which the contract will be terminated or non-renewed.
8. All schools are required to respond to the non-renewal or termination notice within fourteen (14) days and request an informal hearing if they intend to appeal the decision. The request must be made in writing.
 - a. If the School requests an informal hearing, CSS Management Team and President will conduct the hearing on behalf of St. Aloysius within fourteen (14) days of the request for the hearing.
 - i. Factors that the Management Team will consider include but are not limited to: instituting a turnaround model with an experienced operator, future education initiatives, other factors affecting the school's academic, operational/organizational and/or fiscal performance.
 - ii. Members of the Management Team shall use the Hearing Rubric which will be used to score the hearing and submitted supplemental information.
9. Once CSS has conducted the informal hearing, CSS will present all information discussed at the hearing to the St. Aloysius Board. The St. Aloysius Board shall



make a final determination to rescind the non-renewal or termination or continue with closure of the school.

10. CSS, on behalf of St. Aloysius, shall issue a written decision either affirming or rescinding the decision to not renew the contract. CSS appropriately notices the Governing Authority, school, and ODE within fourteen (14) days of the final decision and maintains records of the communications to comply with sponsor and statutory requirements.
 - a. All non-renewed schools shall continue to operate through the end of the school year in which they have been non-renewed.
 - b. All terminated schools shall cease operation on the date established in the original termination notice after all appeals have been exhausted.
11. The Legal Department designee will send correspondence to the Governing Authority, school leaders, and school Treasurer with its Closure Responsibility Table, Box Labeling Protocol, the Closure Checklist, the Closure Plan, the Ohio Department of Education Suspension and Closing Assurance form and a Sample Parent Letter and will monitor to ensure the Closure Plan is being followed and all documents are being received as outlined in the Closure Checklist.
12. The Legal Department will ensure the school's families were notified of the non-renewal no later than April 15.
13. At the end of the school year or date of termination, the Legal Department works with the school's designated contact person, as required by the charter, to submit all notices, records, financial information and requirements as detailed in the Closure Responsibility Table, the Closure Checklist, the Closure Plan and the Ohio Department of Education Suspension and Closing Assurance form, unless CSS is provided with notice that the school has retained different sponsorship.
14. The Legal Department calendars relevant follow up dates to obtain documents or fulfill requirements as dictated therein. Such critical dates are uploaded to the shared drive and are monitored by the Legal Department and/or the relevant subject matter expert.

DOCUMENTATION / VERIFICATION

All COMMUNITY SCHOOL TERMINATION & NON-RENEWAL PROCESS documents will be saved with a naming convention and the date in the shared drive as follows:

S:\Sponsor Contract Renewals



DOCUMENT HISTORY

Orig. Date May 2012
Rev. Date March 2017
Rev. Date September 2018
Rev. Date September 2019
Rev. Date April 2020
Rev. Date June 2022
Rev. Date October 2022
Rev. Date June 2023

REVIEW AND APPROVAL

Reviewers of the COMMUNITY SCHOOL TERMINATION & NON-RENEWAL PROCESS are as follows:

Reviewed By: Management Team

Date: 06/30/2023

Approved By: President David L. Cash, Jr.

Date: 06/30/2023

With final approval as of the date that the President signs the COMMUNITY SCHOOL TERMINATION & NON-RENEWAL PROCESS document. At that point, the COMMUNITY SCHOOL TERMINATION & NON-RENEWAL PROCESS may be implemented.