STANDARD OPERATING PROCEDURE 3.3

PROCEDURE TITLE: Annual Compliance Onsite Review Process
Department: Compliance Department
Proposed by: VP Director of Sponsorship
Effective Date: 09/01/2013

PURPOSE

The ANNUAL COMPLIANCE ONSITE REVIEW PROCESS provides for consistency in review of school documentation necessary to maintain the school's compliance with all applicable laws, rules, and applicable contractual obligations. The goal of the annual compliance on-site review visits is to assist schools in achieving overall compliance in all areas.

SCOPE

The ANNUAL COMPLIANCE ONSITE REVIEW PROCESS is relevant to all CSS partner schools that are sponsored by St. Aloysius and applies to all CSS staff conducting reviews.

PROCEDURE

The ANNUAL COMPLIANCE ON-SITE REVIEW PROCESS is conducted according to the following procedures:

1. The Compliance Department will finalize and distribute all applicable on-site review tools and provide training to CSS staff and schools prior to annual compliance on-site review.
2. The ANNUAL COMPLIANCE ON-SITE REVIEW shall consist of a virtual meeting to review compliance documentation in the Fall and an onsite file review in the Winter. CSS staff completing the review will coordinate with the school leadership to collect all the necessary compliance documents noted in the Fall/Winter Review spreadsheet. After completing a desk review of the compliance documentation, the CSS staff will follow-up with

questions or request additional documentation needed resulting from the desk review.

3. In the Winter, the assigned CSS staff will complete an on-site file review with the school. Upon arrival at the school, CSS staff will meet with the school administrator/principal and other relevant staff to review the procedures for data collection. Over the course of the ANNUAL COMPLIANCE ON-SITE REVIEW:
    a. CSS staff will be reviewing the school's compliance and collecting data relative to all rules, laws and applicable contractual obligations as provided in the compliance spreadsheets, staff roster, and student files.
    b. CSS staff will review the school's previous year's annual compliance on-site review documentation, which includes relevant policies and procedures, inspections, and other documentation required to show the school's overall compliance with all rules, laws and applicable contractual obligations and compare to the school's current documentation.
        i. If the documentation has changed from the previous year, CSS staff will collect new documentation electronically.
    c. CSS staff collects the staff roster and reviews the school staff's licensure, background checks and training per the completed staff roster provided by the school to ensure compliance with all rules, laws and applicable contractual obligations.
    d. CSS staff reviews a sample of student files to ensure collection of documentation for students relative to all rules, laws and applicable contractual obligations.
4. During the on-site review, CSS staff may interview and collect data from school employees, including the school administrator/principal, and/or other stakeholders (e.g. the school's governing authority members, students, parents, treasurer, management company staff, board counsel, etc.).
    a. When an interview is conducted, the following should be considered:
        i. Reviewer should use compliance spreadsheets, staff roster and/or student records checklist to guide questions.
        ii. Reviewer should consider requirements in all applicable rules, laws and applicable contractual obligations, policies, procedures, inspections, staff roster and student files during the interview.

iii. As interviews are completed, CSS staff will complete the compliance spreadsheets indicating compliance or non-compliance.
    1. Any non-compliance items will be provided to the school leader/principal or other relevant staff for follow-up after the interview.

b. Classroom observations are not generally conducted during annual compliance on-site reviews.
c. If observations are conducted, the following should be considered:
    i. A representative selection of classrooms should be observed;
    ii. Reviewers should avoid interrupting the teacher(s) or creating any unnecessary disturbances during classroom instruction;
    iii. Reviewer should use the CSS observation tool to note strengths and weaknesses relative to areas noted on the observation tool;
    iv. When possible the teacher(s), Community School Leadership or Building Leadership Team, students, coaches, aides, or parents should be utilized as a resource for collecting information/data relative to the areas noted on the observation tool and/or documents collected during observation (if any);
    v. Reviewer should refer to/compare observations to requirements in charter language, education plan, Ohio Improvement Plan, policy, procedure, or rule/law.

5. CSS staff continues to collect additional data not available at the time of the on-site review from the school leader/principal or other relevant staff and/or stakeholders in order to assist the school in achieving the goal of overall compliance.
6. After all data has been collected, the Compliance Department will send a final annual compliance on-site review report (i.e., site visit report summary template) to the governing authority members, school leader/principal, governing authority legal counsel and management company representative (if applicable), and the CSS Office Manager to be included in the school's next board meeting documentation.
    a. This written report will include the information collected during the site visit, a summary of findings, areas needing improvement (if applicable), recommendations, and areas of strength.

i. If an area needing improvement is identified, the written report will specify the steps or time frames for doing so and request relevant status updates from the school.
ii. The Compliance Department and/or Legal Department will review relevant status updates from the school regarding its progress in the area.
iii. The Compliance Department will also review areas needing improvement and determine if technical assistance should be provided to the school.

DOCUMENTATION/VERIFICATION

All ANNUAL COMPLIANCE ONSITE REVIEW PROCESS documents will be saved as working copies and will be saved as distribution copies when available for proofing. Once the assigned staff member uploads to the distribution folder on the Shared drive, the Compliance Department will verify accuracy and consistency in formatting. The Compliance Department will resave the final versions to an annual compliance assessment process folder identifying the school name on each Excel and PDF file.

Location of documentation:

S:/SITE VISITS

DOCUMENT HISOTRY

Orig. Date May 2012
Rev. September 2012
Rev. September 2015
Rev. February 2016
Rev. March 2017
Rev. October 2018
Rev. August 2019
Rev. July 2022

REVIEW AND APPROVAL

Reviewer of the ANNUAL COMPLIANCE ONSITE REVIEW PROCESS is as follows:

Reviewed By: Management Team Date: 07/27/2022

Approved By: President David L. Cash, Jr. Date: 07/27/2022

The effective date is as of the date signed above. Processes are consistently reviewed and revised as necessary throughout the term. The ANNUAL COMPLIANCE ONSITE REVIEW PROCESS may be implemented as currently written and will be formally evaluated