



STANDARD OPERATING PROCEDURE 3.9

PROCEDURE TITLE: Intervention Process

Department: ALL

Proposed by: General Counsel

Effective Date: 07/01/2013

PURPOSE

This INTERVENTION 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 INTERVENTION PROCESS relates to any deficiency requiring a request for a corrective action plan for a school.

SCOPE

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

PROCEDURE

The CSS INTERVENTION PROCESS is as follows:

1. Conditions that may trigger intervention and corrective action include, but are not limited to:
 - a. Violation of rule and/or law;
 - b. Violation of community school contract;
 - c. Excessive decrease in enrollment;



- d. Financial instability;
 - e. Failure to respond to reasonable requests from sponsor;
 - f. Performance deficiencies, such as failure to make adequate academic progress or meet the local report card measures;
 - g. Performance of the governing authority or its individual members that is detrimental to the overall success of the school;
 - h. 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 member(s) may identify a condition that triggers the potential need for an intervention 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(s) may also note a condition that may trigger intervention and the potential need for an intervention letter or 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 Chief Operating Officer
 7. The Chief Operating Officer will review with the President.
 8. The President makes the determination if an intervention letter or request for a corrective action plan should be sent to the school.
 9. Intervention letters will be sent on CSS letterhead with signature of President.
 - a. Letters will note areas of concern and indicate failure to remedy these concerns could result in a corrective action plan.



- b. The designated CSS staff member who requested the letter to be sent will follow up with the school to get a status update within 10 business days after the letter is sent.
 - c. If all areas of concern are not adequately addressed, the school may be sent a request for a corrective action plan.
10. If a CAP is being sent, the President or designee shall contact the school and notify them that a CAP will be forthcoming.
11. The department manager/CSS staff member will complete the CAP Request Template and obtain the President's approval.
 - a. The CAP request template must include all Action Steps Required and a timeline to complete the required actions steps. If possible, the due date should be after the next scheduled board meeting.
12. The department manager/CSS staff member will send the approved CAP Request Template to the Legal Project Manager.
13. The Legal Project Manager will complete the CAP Cover Letter, review the template for formatting issues and send the final copy of the Cover Letter and the CAP Request Template to all governing authority members with copy to board counsel, school leader, management company representatives (if applicable), CSS President, CSS Management Team, and Office Manager.
 - a. The Office Manager will include the CAP request with the board materials sent to board liaisons and CSS sponsor representative prior to the next board meeting.
14. The Legal Project Manager will update the CAP Tracking Spreadsheet with the date sent, reason for CAP request and the due date of the response. The CAP Tracking Spreadsheet will be shared at all monthly CSS Staff Meetings.
15. The Legal Project Manager will monitor the CAP request due dates and communicate directly with the governing authority and/or its representative as needed.
16. Upon receipt of the proposed CAP from the school, the Legal Project Manager will forward it to the requesting department manager/CSS staff member to review and will include a date it should be reviewed by.
17. The department manager/CSS staff member will determine if the CAP submitted is:
 - a. Approved and the plan needs to be monitored,
 - b. Not approved and requires additional information.
18. The department manager/CSS staff member will complete the respective form letter and send it to the Legal Project Manager for distribution.
 - a. CAP Approval Letter with monitoring - If the CAP is approved and the plan needs to be monitored, it is the responsibility of the department manager to



discuss the plan at their monthly department meetings. The department manager will determine if the CAP will be monitored by their department or at monthly governing authority meetings and communicate this to the Legal Project Manager. The Legal Project Manager shall note this on the CAP Tracking Spreadsheet. All status updates must be provided to the Legal Project Manager so the tracking spreadsheet can be updated accordingly.

- b. CAP Denial or Request for Additional Information Letter - If the CAP is not approved or needs additional information, the Legal Project Manager will send the letter and update the CAP Tracking Spreadsheet accordingly. The CAP process will then resume at step 12 above.
19. The Legal Project Manager will regularly request status updates from either the CSS Staff member attending the board meetings, the department manager, the assigned staff member, or the school and will review the requested status updates to ensure that the Governing Authority is complying with the terms of the corrective action plan.
20. Departments must discuss any CAPs issued by their department and status updates at each department meeting.
21. The Legal Project Manager shall determine if the governing authority is adequately monitoring and implementing the CAP by regularly reviewing the requested status updates. Status updates may be provided from either the CSS Staff member attending the board meetings, the department manager, the assigned staff member, or the school.
22. If the Legal Project Manager determines the governing authority is not adequately monitoring and implementing the CAP, the department manager responsible for the CAP will be notified.
 - a. If additional information is needed regarding the monitoring, the department manager or designee may contact the CSS representative attending the board meetings, the board liaison, board counsel, or any other school personnel.
23. If the requirements of the CAP are not being met, the following may occur:
 - a. The matter may be referred to the General Counsel or designee for placement on probation (SOP 2.4 will be followed including final approval by St. Aloysius) or suspension (SOP 2.5 will be followed including final approval by St. Aloysius).
 - b. The matter may be referred to the General Counsel or designee for contract termination (SOP 2.6 will be followed including final approval by St. Aloysius).



24. Once it has been determined that the governing authority has met the terms of the CAP and the department manager has determined that it may be released from the CAP, the department manager shall notify the Legal Department Manager.
 - a. The Legal Project Manager shall draft and send the Release from CAP Letter and update the CAP Tracking Spreadsheet accordingly.

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

Rev. Date April 2022

Rev. Date June 2022

Rev. Date October 2022

Rev. Date June 2023



REVIEW AND APPROVAL

Reviewers of the INTERVENTION PROCESS are as follows:

Reviewed by: Management Team:

Date: 06/30/2023

Approved by: President David L. Cash, Jr.

Date: 06/30/2023

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