



## **STANDARD OPERATING PROCEDURE 2.12**

### **PROCEDURE TITLE: Community School Termination Process**

**Department: Legal Department**

**Proposed by: VP Sponsorship Operations**

**Effective Date: 06/21/2024**

#### **PURPOSE**

The COMMUNITY SCHOOL TERMINATION PROCESS ensures that all necessary notifications and closure requirements are met by the deadlines established by the sponsor, rule and law, and the Department of Education and Workforce. The process also ensures that, if a terminated school does not close but rather is awarded a contract by DEW or a different sponsor, all requirements are documented, submitted and retained as required.

#### **SCOPE**

The COMMUNITY SCHOOL TERMINATION PROCESS is used to guide all schools from the point of a termination decision through to closure and applies to all staff involved in the termination process.

#### **PROCEDURE**

1. The COMMUNITY SCHOOL TERMINATION PROCESS begins with an evaluation of concerns reviewed by the CSS Executive Team.
2. Conditions that may trigger consideration of termination 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. Organizational/Operational deficiencies
  - f. Failure to respond to reasonable requests from sponsor



- g. Failure to adequately address deficiencies from the school after being placed on probation
    - h. Failure to make adequate academic progress or meet local report card measures
3. Documentation noting conditions that may trigger termination may include, but are not limited to, the following:
  - a. Enrollment and financial review documents
  - b. Communication from the Department of Education and Workforce or other stakeholders (i.e. Auditor of State)
  - c. Site Visit Reports
  - d. Audit Reports
  - e. Board Meeting Reports
  - f. Complaints
  - g. Corrective action plans
  - h. Email correspondence with sponsor or CSS
  - i. Probation notices
  - j. At-Risk for Closure List as provided by DEW
4. If possible, a school will be placed on suspension prior to termination.
5. Additionally, internal staff will contact the school leader, management company representative (if applicable), governing authority counsel, governing authority president (collectively the “school”) and any other personnel related to the issues reported.
  - i. CSS staff member or department manager may conduct further investigation, including contact school personnel, governing authority members, management company representatives and governing authority legal counsel.
  - ii. The investigation is not limited to but may include verbal conversations, email correspondence and document collection.
6. After completion of the investigation, 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 terminate the school.
7. Once a decision is made to terminate, the termination letter is sent from the Legal Department on behalf of St. Aloysius.
8. All schools are offered the opportunity to respond to the termination letter 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 Executive 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 Executive 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 Executive 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 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 notifies the school, and DEW within fourteen (14) days of the final decision and maintains records of the communications to comply with sponsor and statutory requirements.

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 school, and school Treasurer with its Closure Responsibility Table, Box Labeling Protocol, the Closure Checklist, the Closure Plan, the Department of Education & Workforce 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. 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 Department of Education & Workforce Suspension and Closing Assurance form, unless CSS is provided with notice that the school has retained different sponsorship.
13. 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 PROCESS documents will be saved with a naming convention and the date in the shared drive as follows:

S:\Closed-Suspended-Reassigned Schools:\Closed Schools

## **DOCUMENT HISTORY**

Orig. Date June 2024

## **REVIEW AND APPROVAL**

Reviewers of the COMMUNITY SCHOOL TERMINATION PROCESS are as follows:

Reviewed By: Management Team

Date: 06/21/2024

Approved By: President David L. Cash, Jr.

Date: 06/21/2024

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