

STANDARD OPERATING PROCEDURE 3.01: INTERVENTION PROCESS

July 1, 2025

A. PURPOSE

This INTERVENTION PROCESS provides guidance to all team members and the Management Team on how to communicate, evaluate and track interventions 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 Charter School Specialists (CSS) by stakeholders, such as the Ohio Department of Education and Workforce 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 for a school.

B. APPLICABILITY

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

C. DEPARTMENT RESPONSIBILITIES

| | |
|--------------------------------|---------------------------------|
| Responsible Department: | Legal Department |
| <i>Other Departments:</i> | <i>Management Team</i> |
| | <i>Executive Team</i> |
| | <i>C Suite Level Executives</i> |

D. 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. Organizational/Operational Deficiencies
 - f. Failure to respond to reasonable requests from sponsor;

- g. Performance deficiencies, such as failure to make adequate academic progress, meet the local report card measures or be placed on the at-risk for closure list by the Department of Education & Workforce;
 - h. Performance of the governing authority or its individual members that is detrimental to the overall success of the school;
 - i. 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.
 - j. Failure to adequately address issues from an Intervention
 - 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 Department of Education & Workforce or other stakeholders (i.e. Auditor of State)
 - c. Site Visit Reports
 - d. Audit Reports
 - e. Governing Authority Meeting Reports
 - f. Complaints
 - g. Email correspondence with CSS
 - 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. CSS may consider and collect data relevant to the timeliness of document submission, the severity of the conditions warranting the intervention, the school's history of compliance with prior interventions, and the number of times a school has been placed on an intervention.
 - 7. After completion of the investigation, the department manager discusses the deficiency with the C Suite Level Executives.
 - 8. The C Suite Level Executives make the determination of which level of intervention the school should be placed in.
-

9. Intervention letters

- a. An Intervention Letter will be sent on CSS letterhead with signature of the Department Manager for the Department sending the intervention letter.
 - i. Letters will note areas of concern and indicate failure to remedy these concerns could result in a corrective action plan.
 - ii. If all areas of concern are not adequately corrected, the school may be sent a request for a corrective action plan.

10. Corrective Action Plans (CAP)

- a. The C Suite Level Executives shall contact the school and notify them that a CAP will be forthcoming.
 - b. The department manager/CSS staff member will complete the CAP Request Template and obtain the C Suite Level Executives' approval.
 - i. The CAP request template must include that action steps are required and a timeline to complete the required actions steps. If possible, the due date should be after the next scheduled board meeting.
 - c. The department manager/CSS staff member will send the approved CAP Request Template to the Legal Department.
 - d. The Legal Department 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), and the Commissioners.
 - i. The Legal Department will include the CAP request with the board materials sent to board liaisons and CSS sponsor representative prior to the next board meeting.
 - e. The Legal Department 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.
 - f. The Legal Department will monitor the CAP request due dates and communicate directly with the governing authority and/or its representative as needed.
 - g. Upon receipt of the proposed CAP from the school, the Legal Department will forward it to the requesting department manager/CSS staff member to review and will include a date it should be reviewed by.
 - h. The department manager/CSS staff member will determine if the CAP submitted is:
 - i. Approved and the school will be released from corrective action per process below.
-

- ii. Approved and the plan needs to be monitored,
 - iii. Not approved/denied and requires additional information.
 - i. The department manager/CSS staff member will complete the respective form letter and send it to the Legal Department for distribution.
 - i. CAP Approval Letter with monitoring - If the CAP is approved and the plan needs to be monitored, 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 Department. The Legal Department shall note this on the CAP Tracking Spreadsheet. All status updates at governing authority meetings must be provided to the Legal Department so the tracking spreadsheet can be updated accordingly. If monitoring is being completed at department meetings, the department manager shall send monthly meeting minutes to the Legal Department.
 - ii. CAP Denial or Request for Additional Information Letter - If the CAP is not approved or needs additional information, the Legal Department will send the letter and update the CAP Tracking Spreadsheet accordingly. The CAP process will then resume at step 12 above.
 - j. The Legal Department 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.
 - k. Departments must discuss any CAPs issued by their department and status updates at each department meeting.
 - l. The Legal Department 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.
 - m. If the Legal Department does not receive the requested status updates, the department manager responsible for the CAP will be notified.
 - i. 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.
 - n. If the requirements of the CAP are not being met, the following may occur:
 - i. The matter may be referred to the Legal Department for placement on probation or suspension.
-

- ii. The matter may be referred to the Legal Department for contract termination (Community School Termination Process will be followed including final approval by St. Aloysius).
- o. 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.
 - i. The Legal Department shall draft and send the Release from CAP Letter and update the CAP Tracking Spreadsheet accordingly.

11. Probation

- a. The Legal Department will prepare a draft for review and final approval from the C Suite Level Executives.
 - b. Upon C Suite Level Executives' approval of the document, the following occurs:
 - i. The Legal Department finalizes the probation letter ('letter') with any necessary revisions.
 - ii. The Legal Department sends the letter electronically to all governing authority members with cc to governing authority counsel, school leader, management company representative (if applicable), C Suite Level Executives, and the Management Team, for distribution prior to the next governing authority meeting.
 - iii. Legal Department submits the probation notice via Epicenter to the Department of Education and Workforce.
 - iv. The School shall be provided five (5) business days after the upcoming governing authority meeting to respond to the probation letter.
 - 1. If the deficiency noted in the probation letter is time sensitive and needs to be addressed prior to the next governing authority meeting, the Legal Department shall set an appropriate date for response.
 - v. The Legal Department updates the corrective action plan/probation tracking spreadsheet with date sent, reason and due date for response.
 - vi. Legal Department shall also share this spreadsheet at Staff Meetings to update staff on probation status of each school.
 - c. The Legal Department monitors the due date.
 - i. If a response is not received by the due date:
 - 1. Legal Department shall decide if the school shall be given more time to respond.
-

2. If the school fails to respond, the Legal Department and C Suite Level Executives discuss the next course of action, which may include assuming the operations of the school, suspension or termination.
 - d. Upon receipt of the probation response from the governing authority, the following occurs:
 - i. The Legal Department will forward to the appropriate department manager for an initial sufficiency review.
 1. The Department Manager will ensure all deficiencies have been addressed.
 - a. If all deficiencies have not been addressed, the Department Manager will notify the Legal Department to send a request for additional information within five (5) business days to the governing authority. The Governing Authority will be given five (5) business days to provide additional information.
 - ii. If the governing authority has adequately addressed all deficiencies:
 1. The Department Manager will notify the Legal Department to send a notice to the governing authority noting receipt/approval and monitoring protocol as necessary within ten (10) business days of receipt of the final plan.
 - iii. If the governing authority has not adequately addressed all deficiencies:
 1. The Legal Department shall determine the next steps.
 - a. The Legal Department can request additional information to be provided within five (5) business days.
 - b. Upon receipt of additional information, repeat steps listed above.
 - c. If additional information does not satisfy the original request, the Legal Department discusses with the Management Team to determine the consequences for not resolving the deficiency. The consequences may include, assuming the operations of the school, suspension, or termination.
 - d. Next steps will be communicated with the school within ten (10) business days.
 - e. Departments are responsible for adding a review of schools on probation and probation requirements to monthly department meeting agendas.
 - f. If a school is not released from probation by the end of the school year, the probation becomes void per the Ohio Revised Code.
-

- i. The C Suite Level Executives and Management Team shall then evaluate if the school needs to be placed on probation at the beginning of the following school year or other actions should be taken

12. Assuming Operations

- a. If the deficiency is severe and violates section 1.7 of the charter contract, if the school is unable to correct the conditions on its own, or if it is not possible for the school to submit a corrective action plan or response to probation, CSS may assume operations of the school. The CSS Executive Team will review the documentation and data collected and notify the Governing Authority members of the school and the school leader that CSS intends to assume the operations of the school and the effective date of the assumption of control.
- b. Once notification has been submitted to the Governing Authority of the school and to the school leader, CSS shall:
 - i. If the issue involves modifying the operations of the school without approval: CSS shall return the school to the operating condition it was prior to the modification of the operations, including but not limited to the following: cancelling or terminating contracts entered into that are not in the best interest of the school, re-issuing contracts that were terminated or expired without approval, or re-employing personnel that were discharged without approval.
 - ii. If the issue involves a Governing Authority member or members abandoning his/her/their duties under the Charter Agreement or Ohio law; being in material breach of his/her/their duties under the Charter Agreement or Ohio law; or the removal of one or more Governing Authority members for just cause: CSS shall appoint a Governing Authority member or members to the Governing Authority board to replace those members that have abandoned their duties; are in material breach of their duties; or are being removed for just cause.
 - iii. If the issue involves a school experiencing financial difficulties or losses before the end of the school year: CSS shall give notice to the treasurer/fiscal officer of the school and the school leader that the treasurer/fiscal officer of the school is being removed, and direct that no expenditures are to be made until a new treasurer or fiscal officer has been appointed.
 - 1. CSS shall appoint a new treasurer/fiscal officer of the school and have the Governing Authority execute all resolutions necessary to effectuate the transfer of accounts and monies to the new treasurer/fiscal officer.

2. If there will be losses before the end of the school year, CSS shall look for recovery from the management company, if applicable, and if there is no management company, or there is no possibility of recovery, to direct the treasurer/fiscal officer to streamline the budget and pay only necessary and needed expenses to operate the school until the end of the school year.
- c. At the conclusion of the school year, CSS may give notice that the school will be placed on suspension in accordance with Standard Operating Procedure 2.5.
- d. If a school closes prior to the end of a school year and CSS is unable to assume operations of the school as noted above CSS will:
 - i. Prioritize notification to parents and assist students and their families in maintaining an effective educational environment as soon as possible, including the selection of new schools and the transfer of necessary student records;
 - ii. support school staff in the transition and locating new positions;
 - iii. securing all school property and funds;
 - iv. maintain transparent communication with all stakeholders throughout the process

13. Suspension

- a. Once suspension is determined to be the correct course of action, the Legal Department will prepare a draft for review and final approval from the C Suite Level Executives and St. Aloysius.
 - b. Upon C Suite Level Executives and St. Aloysius approval of the document, the following occurs:
 - i. The Legal Department finalizes the intent to suspend letter ('letter') per R.C. 3314.072 with any necessary revisions .
 - ii. The Legal Department sends the letter electronically to all governing authority members with cc to governing authority counsel, school leader, management company representative (if applicable), C Suite Level Executives, and the Management Team.
 - iii. The governing authority shall be provided five (5) business days to submit to the sponsor a proposal to remedy the conditions cited as reasons for the suspension.
 - iv. The Legal Department, C Suite Level Executives and the Management Team shall promptly review the proposed remedy.
 - v. The Legal Department shall respond to the governing authority and school within a reasonable amount of time after receiving the proposal to remedy the conditions.
-

- vi. If the sponsor approves of the remedy proposed, the governing authority and school will not be suspended and will be permitted to continue operating under conditions provided in a response.
 - 1. The Legal Department shall draft the response and submit to the Commissioners for approval.
 - 2. The Legal Department will provide the response to all governing authority members with cc to governing authority counsel, school leader, management company representative (if applicable), C Suite Level Executives, and the Management Team for distribution prior to next governing authority meeting.
- vii. If the sponsor disapproves the remedy proposed by the governing authority, if the governing authority fails to submit a proposed remedy in the manner prescribed by the sponsor, or if the governing authority fails to implement the remedy as approved by the sponsor, the sponsor may suspend operation of the school per R.C. 3314.072.
- c. The Legal Department shall provide an official notice of suspension to all governing authority members with cc to governing authority counsel, school leader, management company representative (if applicable), C Suite Level Executives and the Management Team, for distribution prior to next governing authority meeting.
 - i. The Legal Department will submit the suspension notice via Epicenter to the Department of Education and Workforce.
- d. Upon suspension of the school, the school shall cease all operations on the next business day.
- e. The Legal Department shall implement the closure process which also applies to suspended schools
- f. If the governing authority of the school fails to provide a proposal to remedy the conditions cited by the sponsor as reasons for the suspension, to the satisfaction of the sponsor, by the thirtieth day of September of the school year immediately following the school year in which the operation of school was suspended, the charter contract between the governing authority and the school shall become void and the school will be permanently closed

E. DOCUMENTATION

Location of documentation:

S:\Corrective Action Plans\SY

F. GLOSSARY

Intervention, Deficiency, Governance, Operations, Fiscal Management, Educational Model, Operations, Stakeholders, Department of Education and Workforce, Auditor of State, Comprehensive On-Site Review, Oversight, Technical Assistance, Audit, Investigation, Intervention Letter, Corrective Action Plan, CAP, Probation, Suspension, Termination, Closure, Areas of Concern, CAP Tracking Spreadsheet, CAP Approval Letter, Monitoring, Probation Letter, Epicenter, Assume Operations, Modifying Operations of School, Abandoning Duties, Material Breach, Financial Difficulties, Intent to Suspend Letter

G. CROSS REFERENCED SOP'S

[Community School Termination Process](#)

H. REVIEW AND APPROVAL

Approved By: Chief Executive Officer David L. Cash, Jr.

Date: 6/30/2025
