

STANDARD OPERATING PROCEDURE 4.03: ANNUAL COMPLIANCE REVIEW PROCESS

July 1, 2025

A. PURPOSE

The ANNUAL COMPLIANCE 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.

B. APPLICABILITY

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

C. DEPARTMENT RESPONSIBILITIES

Responsible Department:	Compliance Department
<i>Other Departments:</i>	<i>School Improvement Team</i> <i>Legal Department</i>

D. PROCEDURE

The ANNUAL COMPLIANCE REVIEW shall consist of a desk review of each school's compliance documentation and an onsite compliance review.

1. The Compliance Department will finalize and distribute all applicable desk review and on-site review tools and provide training to CSS staff and schools prior to annual compliance reviews. The Legal Department will share the annual Legal and Policy update with the Compliance Department so that the Compliance Department may update the compliance worksheet. Along with the Legal and Policy Update, the Compliance Department shall review the current ODEW provided SES Worksheets and the AOS Bulletin to determine necessary changes to any monitoring tools.
 2. Beginning in July, the Compliance Department shall review prior-year documentation to determine which documents or files may carry over into the new school year based on the updated CSS compliance monitoring tools. After CSS compliance tools and training materials are finalized and shared with schools, the
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Compliance Department will implement one of the following desk review processes based on school status:

a. New Schools and/or New School Leaders

- i. Schools in their first year of operation, new to St. Als or schools with new leadership personnel, shall receive a desk review with a required virtual compliance meeting during the Fall. These meetings will generally be scheduled between September and October, to allow adequate time to complete the ODEW Compliance Worksheet prior to the review meeting.
- ii. Prior to the virtual meeting, the Compliance Department will review previous compliance documents, if available, CSS shared drive folders, emails, and other available records to account for any documents already on file and identify items that remain outstanding.
- iii. During the virtual review, the Compliance Department will review the compliance worksheet with school representatives, discuss any items marked noncompliant, incomplete, or unanswered, and provide guidance regarding remaining compliance items.

b. Existing/Established Schools

- i. Established schools with consistent prior compliance history may complete the Fall review through an asynchronous process. These schools will be provided access to a webinar or presentation that includes:
 1. New or revised compliance requirements for the current school year
 2. Reminders regarding the annual compliance process, timelines, and submission expectations
 3. Any school-specific areas of focus identified by the Compliance Department
- ii. The Compliance Department will review previous compliance documents, if available, CSS shared drive folders, emails, and other available records to account for any documents already on file and identify items that remain outstanding.
- iii. A virtual meeting may be scheduled at the request of the school or when deemed necessary by the Compliance Department.

c. Desk Review Follow-Up

- i. Following the desk review process, the Compliance Department will follow up with the school as needed to outline any outstanding compliance items or documents still required. The Compliance Department will provide updates to school stakeholders, including
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governing authority members, regarding outstanding compliance items in February and April.

3. The onsite compliance reviews will be conducted as follows:
 - a. Each school will also receive an onsite compliance review. The onsite compliance review will occur in either the first half or the second half of the school year in coordination with the School Improvement Team's On-site Assistance Review (OAR) schedule. The School Improvement Team and the Compliance Department will coordinate to ensure each school has an on-site visit in each half of the school year.
 - b. The Compliance Department will coordinate with the school leadership to substantiate all the necessary compliance requirements noted on the Onsite Compliance Review worksheet.
 - c. During the Annual Onsite Compliance Review:
 - a. Upon arrival at the school, The Compliance Department will meet with the school administrator/principal and other relevant staff to review the procedures for data collection.
 - b. The Compliance Department reviews the school's compliance and collects data related to all rules, laws and applicable contractual obligations as provided in the compliance spreadsheets, staff roster, and student files.
 - c. The Compliance Department reviews/confirms:
 1. A sample of general education student files to ensure collection of documentation for students relative to all rules, laws and applicable contractual obligations.
 2. Unless otherwise completed by the Director of Special Education, a sample of special education student files to ensure collection of documentation for students relative to all rules, laws and applicable contractual obligations.
 3. Specific onsite requirements as noted on the Onsite Compliance Review worksheet relative to all rules, laws and applicable contractual obligations.
 - d. During the on-site review, the Compliance Department shall interview and collect data from at least three stakeholder groups, including but not limited to: the school administrator/principal, academic coaches, administrative staff, EMIS personnel, school support staff, intervention specialists, career advisor, the school's governing authority members, students, parents, treasurer, management company staff, board counsel, etc. When an interview is conducted, the following should be considered:
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1. Compliance spreadsheets, staff roster and/or student records checklist to guide questions.
 2. Requirements in all applicable rules, laws and applicable contractual obligations, policies, procedures, inspections, staff roster and student files during the interview.
- e. As interviews are completed, the Compliance Department 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.
 2. If there are items noted during the Special Education file review, the Compliance Department shall provide notification to the School Improvement Team within 5 business days of the onsite visit.
- f. Classroom observations are not generally conducted during annual compliance on-site reviews, unless there are concerns regarding the school's implementation of their education plan. If observations are conducted, the following should be considered:
1. A representative selection of classrooms should be observed;
 2. Avoiding interrupting the teacher(s) or creating any unnecessary disturbances during classroom instruction.
 3. Using the CSS observation tool (if applicable) to note strengths relative to areas noted on the observation tool;
 4. 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);
 5. Referring to or comparing observations (if applicable) to requirements in charter language, education plan, Ohio Improvement Plan, policy, procedure, or rule/law.
- g. The Compliance Department 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 to assist the school in achieving the goal of overall compliance.
- h. After the onsite compliance review, not later than the month after the visit, the Compliance Department will send an on-site review summary to the governing authority members, school leader/principal, governing authority legal counsel and
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management company representative (if applicable), and the Legal Department to be included in the school's next board meeting documentation.

4. The end of the Annual Compliance Onsite Review Process is April 30. Within 5 business days of the end of the Annual Compliance Onsite Review process, the Compliance Department will send, as a part of the Annual Compilation Report, a final annual compliance review report to the governing authority members, school leader/principal, governing authority legal counsel and management company representative (if applicable), and to the Legal Department 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.
 - b. If an area needing improvement is identified, the school shall receive a corrective action plan (CAP) per the Intervention Process which will include the steps or time frames for resolving the deficiency.
 - c. The Compliance Department will request relevant status updates from the school regarding its progress in resolving the deficiency.
 - d. The Compliance Department and/or Legal Department will review relevant status updates from the school regarding its progress in the area.
 - e. The Compliance Department will also review areas needing improvement and determine if technical assistance should be provided to the school.
5. If a school has any outstanding compliance items after the April 30 deadline, the school will not receive the final annual compliance review report, instead the school shall receive an Intervention Letter noting any deficiency. The Intervention Letter will allow for 2 weeks to submit any final compliance documentation. Once all of the deficiencies have been corrected, the school will receive the final compliance report as a part of the Annual Compilation Report within one week.
6. Should a school still have outstanding compliance items after the Intervention Letter deadline, the school shall receive a Corrective Action Plan request for any deficiency. The school's Annual Compilation Report will then be completed and distributed noting the Corrective Action Plan request.

E. DOCUMENTATION

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's name on each Excel and PDF file.

Location of documentation:

S:/SITE VISITS

F. GLOSSARY

Compliance, contractual obligations, onsite, site visit, site-visit, virtual meeting, virtual compliance review, compliance tools, compliance documents, compliance worksheet, student files, stakeholder groups, non-compliance, annual compilation report, intervention, deficiency, corrective action plan.

G. CROSS REFERENCED SOP'S

None

H. REVIEW AND APPROVAL

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

Date: 06/30/2026
