



OVERSIGHT TRANSPARENCY POLICY

Pursuant to the Ohio Department of Education’s sponsor evaluation criteria D.01 (Oversight Transparency), the Thomas B. Fordham Foundation (TBFF) will implement the following policy and process for TBFF’s oversight and evaluation system.

TBFF has a protocol for monitoring compliance with legal requirements, financial health, school data, school operations, and school governance on an ongoing basis. The protocol is provided below.

Monitoring is communicated to schools via Epicenter notifications, site visits, email communications, newsletters, annual reports, phone calls and/or in-person visits.

COMPLIANCE

Epicenter

Timing: ongoing

Epicenter is TBFF’s online document and compliance management system. Upcoming compliance requirements with due dates are emailed weekly to each school’s Epicenter coordinator, school leader, and any other individuals (e.g., governing authority, treasurer or administrator) that a school chooses to include in notifications. In addition, schools may choose to be notified if any requirements are not completed (either on time or the compliance requirement is not met).

Maintaining Epicenter includes:

- Making the calendar for the upcoming year available to schools prior to July 1;
- Checking for document submission and compliance to statute/law; and
- Updating and adding or deleting requirements as necessary.

Joint Committee on Agency Rule Review (JCARR), Rules Changes, Legislative Updates, Auditor of State (AOS) Bulletins

Timing: as released by various state agencies.

TBFF checks bi-weekly for notifications, changes, or updates from the various state agencies and regulatory bodies. TBFF staff adds relevant information to regular communications with sponsored schools (e.g., email, newsletter).

Ohio Department of Education (ODE) Communication

Timing: as released by ODE.

As a charter school sponsor in Ohio, TBFF receives regular communication from ODE. These include updated EMIS information, treasurer newsletters, communications for testing coordinators, Ohio Exceptional Children, upcoming important dates and deadlines, and others. TBFF staff are also

members of ODE list serves for the same purpose.

Information important for sponsored schools is forwarded to school leadership as needed or added to regular TBFF newsletters to sponsored schools.

Consolidated Continuous Improvement Plan (CCIP)

Timing: monthly and twice yearly at site visits.

TBFF staff reviews the document library and the federal programs page for CCIP notes and reminders.

For schools on CCIP, TBFF staff checks schools' progress twice a year (during fall and spring site visits) for history log and any issues with applications/title requirements.

Special Education Performance Profile

Timing: upon release from ODE.

TBFF staff checks determinations and profile in the fourteen compliance and results areas. Follow-up with schools includes—but is not limited to—deadlines of required action by the school. TBFF staff also follows-up with indicators and monitoring requirements at school site visits and during special education file reviews.

Ohio Educational Directory System (OEDS)

Timing: quarterly.

TBFF staff checks OEDS quarterly with each school's staff roster for updates/changes; these are reviewed prior to pre-opening.

Education Management Information System (EMIS)

Timing: monthly.

TBFF staff request reports for Epicenter and follow up with schools to obtain any data reported missing and/or any error reports.

TBFF staff follow up with reporting deadlines and requirements and distribute to schools in regular sponsor newsletter.

FINANCIAL

Ohio District Data Exchange (ODDEX)

Timing: monthly.

TBFF staff checks ODDEX monthly to see that the funding enrollment reconciles with what is uploaded and for flags. TBFF staff send out any variance reports to school leadership after comparing with Community School Settlement Report.

EMIS

Timing: monthly.

Demographic numbers are taken from the settlement reports and ODDEX. They are checked against EMIS if there is a conflict with Community School Settlement Reports.

Monthly Financial Review Summary – sent to school governing board members

Timing: monthly.

TBFF staff schedule monthly calls with treasurer, governing authority and/or school leadership to discuss submitted financial reports. The reports, at minimum, consist of:

- Title funding—including budget, status and re-allocations;
- Enrollment comparison to previous month, budget and ODDEX;
- Cash flow and position;
- Expenditures; and
- Audit status (current and previous year).

Audited Financials

Timing: as scheduled by the AOS.

TBFF staff, at a minimum:

- Attend pre and post audit calls;
- Communicate with auditor and return requests for information, e.g. sponsorship annual report;
- Collect data from posted audit reports and compile for trend analysis, as context to the school's financial performance in the current school year. The data includes:
 - Balance Sheet
 - Revenue and Expenses
 - Past Enrollment
 - Other analysis such as debt ratio, per pupil comparisons and cash position

Five-Year Forecast and Annual Budget Review

Timing: twice a yearly (October/May).

TBFF staff review submitted documents and confirm school board approval.

SITE VISITS

School Visit (scheduled)

Timing: twice annually (fall and spring)

TBFF staff, at a minimum:

- Conduct environmental and classroom visits, including attendance verification samples;
- Conduct visual checks (e.g., required postings, observe attendance procedures and documentation);
- Conduct staff and school leader interviews confirming curriculum, professional development, emergency procedures, partnerships and assessments;
- Collect data from stakeholder groups which may include staff, management organization staff, the governing authority, parents, community groups or students;
- Complete student record audits of cumulative files, medical information and special education files;
- Confirm that reports are aligned with the contract requirements in education, accountability, business, and governance; and
- Conduct follow-up for corrective action plans and previous reports.

Pre-Opening Visit

Timing: annually, at least two weeks prior to school starting.

- Documents collected in advance of scheduled on site visit.
- Pre-opening form and guidance sent to school leader and administrator (compliance coordinator) when communication is received from ODE.

School Visit (unannounced)

Timing: at the request of the board, or to follow up from prior observations.

TBFF staff can, without announcement, visit schools to conduct a review of how those schools follow their policies for identification and access.

BOARD AND OTHER MEETINGS

Timing: as scheduled by the school.

Sponsored schools will:

- Send TBFF board materials and agenda regularly; and
- Submit signed and approved meeting minutes regularly via Epicenter.

TBFF staff will:

- Attend a majority of board meetings in person each year;
- Attend school events (e.g., FTE reviews, Special Education Selective Reviews, school lottery, meetings with ODE officials, federal grant reviews); and

- Attend community events (e.g., school commencement, summer program awards and open houses).

SCHOOL PERFORMANCE DATA

School performance data is gathered by TBFF throughout the year at various times including via Epicenter, prior to or at school board meetings, or upon request to the school. Year-end data is gathered after the Ohio Department of Education releases school report cards. School performance and compliance data is reported to school boards twice yearly, with the fall and spring site visit reports.