



**COMMUNITY SCHOOL INTERVENTION POLICY**

Pursuant to the Ohio Department of Education’s sponsor evaluation criteria D.06 (Intervention), the Thomas B. Fordham Foundation (TBFF) will implement the following policy and process for intervention.

The table below outlines levels of interventions. The table is meant to be a guide, not a linear and mandatory escalation process. TBFF has the discretion to skip intervention steps or actions where TBFF believes it is prudent to do so. For example, if there were a health and safety issue that merited immediate attention TBFF might skip Level 2 (corrective action plan and/or documentation in site visit report) and Level 3 (probation) and move right to Level 4 (suspension of operations). Conversely, where a school has been notified of an issue and that issue has been sufficiently addressed or is on track to be sufficiently addressed, TBFF may not require a corrective action plan.

Per Ohio Department of Education (ODE) requirements,<sup>1</sup> we will investigate deficiencies. The process and procedures for investigating and documenting conditions that may trigger intervention and corrective action are set forth in columns three through seven of the Table of Interventions (below).

**Table of Interventions**

Column 1	Column 2	Column 3	Column 4	Column 5	Column 6	Column 7
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<sup>1</sup> Ohio Department of Education 2017-2018 Sponsor Quality Practices Rubric (December 2017) at page 25, *available at* <http://education.ohio.gov/getattachment/Topics/Community-Schools/Sponsor-Ratings-and-Tools/2017-2018-Sponsor-Evaluation-Tools/Quality-Rubric.pdf.aspx?lang=en-US>.

Status	Conditions that may trigger intervention(s)	Corrective action(s)	Steps/action(s) to intervene	Means for monitoring and measuring progress in resolving the deficiency	Timeframe to monitor progress and deadline to resolve the issue	Consequences for not resolving the deficiency
Level 1: Written communication (email or hardcopy document) outlining concern	Failure to meet state agency deadlines <sup>2</sup>	Escalation of issue verbally or in writing to school leader and/or board.	School leader and/or board communicates with agency and resolves issue; provides TBFF with evidence that the issue has been resolved.	Documentation review.	Within 60 days of receipt of documentation.	Implement Level 2 corrective action (see below) for consistent inability to remedy ongoing issues.
	Failure to timely submit key compliance and/or finance items or respond to TBFF inquiry regarding the same.	Escalation of issue verbally or in writing to school leader and/or board.	School leader and/or board work with TBFF to develop a timeline for resolution of the issue(s).	Documentation review.	Within 60 days of receipt of documentation.	Implement Level 2 corrective action (see below) for consistent inability to remedy ongoing issues.

<sup>2</sup> Including but not limited to Ohio Department of Education, Ohio Auditor of State.

Level 2: Corrective action plan and/or notation on site visit report to board	Consistent inability to remedy ongoing compliance or finance issues (e.g., teacher certification, audit findings, internal controls).	Issue a corrective action plan to the school and/or include as a citation on the school's site visit report.	School adheres to the corrective action plan and TBFF monitors until the issue is resolved.	Documentation review, or meeting, or site visit.	Within 60 days of receipt of documentation.	Continue to implement Level 2, or implement Level 3 probation (see below).
	School performance below accountability plan minimums.	School board receives a letter outlining performance issues and is required to develop a corrective action plan to remedy performance deficiencies.	School adheres to the corrective action plan and TBFF monitors until the issue is resolved.	Documentation review, or meeting, or site visit.	Date of subsequent report card release.	Continue to implement Level 2, or implement Level 3 probation (see below).
Level 3: Probation	A rating of "D" or lower on the school's overall value added and performance index report card metrics.	School board develops, and TBFF approves, a plan to remedy the issues that caused probation. TBFF may conduct a specialized site visit <sup>3</sup> .	TBFF documents deficiencies and potential for non-renewal, suspension or termination of contract. School adheres to the probation plan; participates in specialized	Documentation review, or meeting, or site visit.	Until conditions which warranted probation are remedied, or June 30.	Issue new probation, or Level 4 suspension (see below).

<sup>3</sup> A specialized site visit is a visit on-site at a school, by or on behalf of TBFF, in addition to the three site visits required of sponsors under Ohio law.

	<p>Failure to make reasonable progress regarding a corrective action plan or site visit citation.</p>	<p>Meeting with governing authority to inform them of monitoring results, specialized site visit and/or evaluation.</p>	<p>site visit, if necessary.</p> <p>TBFF documents deficiencies and potential for non-renewal, suspension or termination of contract. School adheres to the probation plan; participates in specialized site visit, if necessary.</p>	<p>Documentation review, or meeting, or site visit.</p>	<p>Until conditions which warranted probation are remedied, or June 30.</p>	<p>Issue new probation, or Level 4 suspension (see below).</p>
	<p>Significant financial deficiencies (e.g., audit findings for recovery, serious failure of internal controls, questions regarding the school's financial viability).</p>	<p>Specialized site visit and/or evaluation.</p>	<p>TBFF documents deficiencies and potential for non-renewal, suspension or termination of contract. School adheres to the probation plan; participates in specialized site visit and/or evaluation, if necessary.</p>	<p>Documentation review, or meeting, or site visit.</p>	<p>Until conditions which warranted probation are remedied, or June 30.</p>	<p>Issue new probation, or Level 4 suspension (see below).</p>

Level 4: Suspension of operations	Non-compliance with health or safety requirements (requires immediate suspension).	Written notice stating intent to suspend school operation, or (if applicable and as required by law) written notice of immediate suspension of school operation, including reason(s) for suspension.	School resolves the issue that merited suspension (e.g., health/safety). If the issue is not resolved, the school and TBFF work together to facilitate an orderly winding up and school closure.	Documentation review, or meeting, or site visit, or combination.	First day of suspension through either satisfactory resolution of the issues or June 30.	If issue is not remedied, Level 5 termination (see below).
Level 5: Termination of sponsorship contract <sup>4</sup>	Extended pattern of failure to comply or to meet performance targets, or failure to satisfactorily address or make sufficient progress toward meeting terms of probation, or failure to remedy	Termination process will be conducted in accordance with state law and includes: (1) written notice from sponsor stating reason(s) for proposed termination; (2) site visit (if necessary); (3) opportunity for an informal hearing; (4) sponsor decision to	TBFF sends written notice to the school's board and follows the steps listed at left under "actions/consequences". If there is no appeal by the school, or if there is an appeal and it is denied by TBFF, the school and sponsor work together to facilitate an orderly winding up and school closure.	Documentation, as per statute.	Date set forth in notice of termination.	School closes.

<sup>4</sup> Termination of the sponsorship contract differs from non-renewing a sponsorship contract. Termination occurs when the sponsor ends the sponsorship contract prior to the end of the contract's term.

	reason(s) for suspension of school operation.	terminate or not terminate the contract.				
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