

**RICHLAND ACADEMY OF THE ARTS  
SYSTEM OF OVERSIGHT AND EVALUATION POLICY**

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*Adopted:* Thursday, November 19, 2015  
*Revisited*

**POLICY: SYSTEM OF OVERSIGHT & EVALUATION**

**SUBJECT: COMMUNITY SCHOOL SPONSORSHIP DUTIES**

**PURPOSE: RAA IMPLEMENTS A SYSTEM OF OVERSIGHT & EVALUATION THAT IS DEFINED BY THE COMMUNITY SCHOOL CONTRACT AND THAT PROVIDES THE INFORMATION NECESSARY TO MAKE RIGOROUS AND STANDARDS-BASED RENEWAL, TERMINATION, AND INTERVENTION DECISIONS.**

**STATUORY**

**REQUIREMENT: OHIO REVISED CODE SECTION 3314.03 Specifications of contract between sponsor and governing authority - specifications of comprehensive plan.**

**SPONSOR REQUIREMENTS**

- RAA implements a comprehensive performance accountability and compliance monitoring system that is defined by the Community School contract and that provides the information necessary to make rigorous and standards-based renewal, termination, and intervention decisions.
- RAA predetermines intervention actions for failure to meet contract requirements and clearly articulates and enforces stated consequences for failing to meet performance expectations or compliance requirements.
- RAA 's oversight and evaluation process is fully transparent; it defines and communicates to schools through the school contract and documented guidance the process, methods, and timing of gathering and reporting school performance and compliance data, while acknowledging that some aspects of oversight necessitate flexibility (e.g., a testing investigation).
- RAA reviews and provides monthly feedback on the enrollment and financial records of each school.

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- RAA's recommendations to the Community School board are pro-active in that they help the school achieve greater efficiencies, and also result in timely interventions when problems arise.
- All revenue sources are considered against the school's annual budget.
- RAA employs a licensed school treasurer or equivalent to conduct school financial reviews of the following items:
  - Budget ledgers,
  - Transaction detail reports,
  - Five year forecasts, and
  - Previous Auditor of State reports.
- When RAA receives timely notice and the school agrees to the meeting, RAA always attends the schools' closing audit conferences.
- RAA thoroughly addresses issues identified in a school's annual audit by the Auditor of State, including findings for recovery, issues of material non-compliance, and so on. These actions are evidenced by correspondence and/ or meetings between the school and the sponsor.
- During an onsite review, RAA consistently collects data from a variety of stakeholders, which may include the Community school's governing board members, administrators, teachers, students, parents, and staff from the management company (if applicable). [Reference Onsite Review Policy]
- RAA reviewers receive ongoing training, formal or informal, on the purpose, criteria, process and protocols of conducting onsite visits.
- Additionally, training is provided as needed to remain current with changes in law.
- Data may be collected through a variety of means and throughout the school year.
- RAA will employ reviewers who have demonstrated sufficient experience in Community schools or authorizing, and have diverse expertise (and certification where appropriate) in the following areas:
  - Curriculum, instruction and assessment;
  - Special education and ENGLISH LANGUAGE LEARNERS instruction;
  - School accountability;
  - School facilities;
  - School law;
  - School finance; and,
  - School governance.
- If a Community school has a distinct focus (e.g., online delivery, special education, dropout recovery), the reviewers will have knowledge in the area of the school's focus.
- When existing reviewers do not have the range of expertise needed, RAA contracts with external sources to complete particular aspects of the site visit review.

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- Based upon information from site visits throughout the year, RAA provides the school with a written report which includes the following:
  - The information collected;
  - Areas of strength; and
  - Areas needing improvement.
- After any form of review, RAA requests and reviews status updates from the school pertaining to any areas identified as needing improvement.
- RAA's communication is frequent, specific and informative regarding the school's operations and includes both the school operator and governing authority.
- RAA has no involvement in any school's authority over its day-to-day operations, unless required to as part of its contractual obligations pertaining to intervention.
- RAA collects data in a manner that minimizes administrative burden on the school, and protects student and public interests.
- RAA annually reviews its own compliance requirements and evaluates the potential to increase school autonomy based on flexibility in the law, streamlining requirements or other considerations.
- RAA establishes and makes known to schools at the outset an intervention policy stating the general conditions that may trigger intervention and the types of actions and consequences that may ensue. [Suspension, Termination Policy.]
- RAA gives schools clear, adequate, evidence-based, and timely notice of contract violations and performance deficiencies.
- RAA initiates intervention in the Community school's operations in a timely manner and clearly linked to correcting specific deficits in the school's overall performance.
- RAA allows school reasonable time and opportunity for remediation in non-emergency situations.
- Intervention strategies clearly preserve school autonomy and responsibility (e.g., identifying what the school must remedy without prescribing solutions; and understanding that the school may choose a different path).
- Provides a report to each school, summarizing its performance and compliance to date and identifying areas of strength and areas needing improvement.
- RAA produces an annual public report that provides clear, accurate performance data for the Community schools it oversees, reporting on individual schools and its overall portfolio performance and progress toward achieving its authorizing mission.

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**SPONSOR OVERSIGHT RESPONSIBILITIES—ORC 3314.023**

- Monitor and evaluate compliance with applicable law and contract terms, including: academic performance; financial performance; operations; and governance.
- Ensure appropriate fiscal control, records creation, and records maintenance.
- Report results of evaluation annually to the Department of Education.
- Report other required information to stakeholders.
- Provide technical assistance to schools in complying with applicable laws and contract terms. (Assistance does not, however, include providing legal counsel, operating the school, etc.)
- Intervene as needed when sponsor deems necessary to alleviate performance concerns that threaten public interest and student outcomes.
- \* Intervention may take the form of: informal communication, formal communication, offers of assistance mandatory corrective actions, probation, suspension, contract termination and or closure.
- Prepare and assist with contingency plans in the event the school experiences financial difficulties or closes before the end of the school year.
- Follow applicable Ohio laws and contract terms.

**RAA QUALITY REQUIREMENTS**

- RAA predetermines intervention actions for failure to meet contract requirements and clearly articulates and enforces stated consequences for failing to meet performance expectations or compliance requirements.
- RAA reviews and provides monthly feedback on the enrollment and financial records of each school.
- RAA's recommendations to the board are pro-active in that they help the school achieve greater efficiencies, and also result in timely interventions when problems arise.
- All revenue sources are considered against the school's annual budget.
- RAA employs a licensed school treasurer or equivalent to conduct school financial reviews, which include the following:
  - Budget ledgers,
  - Transaction detail reports,
  - Five year forecasts, and
  - Previous Auditor of State reports.
- When it receives timely notice and the school agrees to the meeting, RAA always attends the schools' closing audit conferences.
- RAA thoroughly addresses issues identified in a school's annual audit by the Auditor of State, including findings for recovery, issues of material non-compliance, and so on. These actions are evidenced by correspondence and/ or meetings between the school and the sponsor.

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**RAA's corrective action could include but not limited to:**

- Adopting or advising relevant policies, reducing deficiencies by implementing additional internal controls, and/or setting up a board audit committee;
- The follow-up to measure, along with school's status of previous citations/concerns/comments from the Auditor;
- RAA engages in follow-up to measure the school's progress in ensuring that similar future findings are avoided, with or without a formal Corrective Action Plan.
- During an onsite review, data is collected consistently from a variety of stakeholders, which may include the Community school's governing board members, administrators, teachers, students, parents, and staff from the management company (if applicable).
- Reviewers receive ongoing training, formal or informal, on the purpose, criteria, process and protocols of conducting onsite visits.
- Additionally, training is provided as needed to remain current with changes in law.
- Data may be collected through a variety of means and throughout the school year.
- RAA seeks to have reviewers who have practiced in Community schools or authorizing for several years, and have diverse expertise (and certification where appropriate) in the following areas:
  - Curriculum, instruction and assessment;
  - Special education and ELL instruction;
  - School accountability;
  - School facilities;
  - School law; and,
  - School finance; and,
  - School governance.
- If the Community school has a distinct focus (e.g., online delivery, special education, dropout recovery), RAA seeks to have reviewers of these schools who are knowledgeable in the area of the school's focus.
- When existing reviewers do not have the range of expertise needed, RAA contracts with external sources to complete particular aspects of the site visit review.

**Conflict of Interest Note:**

This Note addresses Conflict of Interest for reviewers of New and Renewal Applications, Onsite Reviews and other Oversight, Monitor or Evaluation Processes and Procedures concerning the evaluation or review of an entity sponsored by or applying for sponsorship by RAA.

- No internal or external reviewer will be permitted to have a real or perceived conflict of interest with the entity being evaluated or reviewed.
- RAA requires a formal written conflict of interest statement to be signed by every internal and external reviewer of any entity.

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- RAA initiates and documents the removal of an internal or external reviewer from evaluating or reviewing any entity if a formal conflict of interest is found.
- Based upon information from site visits throughout the year, RAA provides the school with a written report which includes the following:
  - The information collected;
  - Areas of strength; and
  - Areas needing improvement.
- Ongoing, RAA requests and reviews status updates from the school pertaining to any areas needing improvement.
- The sponsor's communication is frequent, specific and informative regarding the school's operations and includes both the school operator and governing authority.
- RAA has no involvement in any school's authority over its day-to-day operations, unless required to as part of its contractual obligations pertaining to intervention.
- RAA collects data in a manner that minimizes administrative burden on the school, and protects student and public interests.
- RAA annually reviews its own compliance requirements and evaluates the potential to increase school autonomy based on flexibility in the law, streamlining requirements or other considerations.
- RAA establishes and makes known to schools at the outset an intervention policy stating the general conditions that may trigger intervention and the types of actions and consequences that may ensue.
- RAA gives schools clear, adequate, evidence-based, and timely notice of contract violations and performance deficiencies.
- RAA initiates intervention in the Community school's operations in a timely manner and clearly linked to correcting specific deficits in the school's overall performance.
- RAA allows school reasonable time and opportunity for remediation in non-emergency situations.
- Intervention strategies must clearly preserve school autonomy and responsibility (e.g., identifying what the school must remedy without prescribing solutions; and understanding that the school may choose a different path).
- Provides a report to each school, summarizing its performance and compliance to date and identifying areas of strength and areas needing improvement.
- RAA produces an annual public report that provides clear, accurate performance data for the Community schools it oversees, reporting on individual schools and its overall portfolio performance and progress toward achieving its authorizing mission.

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**Interventions Pursuant to RAA’s Contract Appendix G—Performance Measures**

No special technical assistance or intervention will be required for a school receiving a “meets standards” or better on a particular measure.

All community schools must respond to all measures rated “Does Not Meet Standard” or “Falls Far Below Standard” with a proof of cure and adherence to cure.

The Corrective Action Plan must be submitted within thirty days of findings and gain approval from RAA within forty-five days of the finding.

Corrective Action Plans must demonstrate a thorough understanding of the weakness and why the measure was not met, a targeted plan to cure the particular weakness or weaknesses using recognized best practices, and require monthly (at minimum) progress updates to Sponsor. Should the progress updates show lack of progress, after two months of data, the plan will be re-evaluation and changed, with either additional interventions or supplements.

Community schools should budget for a certain amount of expense due to required performance interventions, programs to collect data, and staff to assess and analyze performance data, as well as increased staff for tutoring or cure of deficiencies.

**Examples of corrective activities related to Academic measures:**

- Sponsor technical assistance
- Targeted coaching
- Targeted tutoring before and/or after school and/or weekends
- Training on Ohio report card indicators or components
- Implementing new or revised OIP Decision Framework/Focused Plan, including SMART goals and action steps
- Reporting Ohio Improvement Progress implementation, including progress on SMART goals, to the Board and Sponsor monthly
- Utilizing Data Teams
- Face to face meetings, increased reporting to Sponsor on progress
- Checklists, periodic data reporting
- Required academic or professional assistance
- Parent Engagement to support students in academics, attendance and curriculum
- Curriculum and assessment mapping and gap analysis
- Study of Ohio’s New Learning Standards and the Next Generation of Assessments in Ohio
- OTES and OPES evaluations
- Visit schools serving similar students but getting “A” ratings to learn Best Practices

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- Targeted professional development
- Meeting any other requirements outlined in legislation or by ODE and submitting any required reporting to ODE
- Abiding by NCLB/ESEA or replacement regulation intervention requirements
- Providing formative assessment, Student Growth Measures and other targeted professional development
- Identifying a Value Added Leader and providing Value Added training to instructional staff
- Quarterly reporting of student academic learning gains to Board & Sponsor

**Examples of corrective activities related to Diverse Learners (Special Education)**

- Independent Special Education Audit
- Special Education training
- Sponsor technical assistance, including but not limited to Sponsor audit of files
- State audit of files, State training
- Legal review of practices and procedures targeted to issues discovered

**Examples of corrective activities related to Fiscal or Financial Matters:**

- Sponsor technical assistance
- Independent training
- Pre-audit exercise with qualified Treasurer consultant
- Enhanced and more accurate financial reports required, such as: additional financial documentation; debt-to-asset ratios; cash flow analyses; requirements of debt to service coverage ratios; enrollment variances and withdrawal frequencies, requirements of minimum unrestricted cash, increased transparency enhancements for analytical purposes

**Examples of corrective activities related to Mission:**

- Sponsor assistance in assessing the ability of the School to realize its mission, which may include aspects of culture, parent satisfaction, or other visions stated by the school in its Contract, curriculum or programming
- Outside coaching or training, research, observations or remedies to meet stated goals
- Leadership training in area of desired goals, and an assessment of why they are not being reached and how to reach them more effectively
- Sponsor assessment of leadership with the Board or the administration and mutual plan to correct weaknesses in meeting mission.

**Examples of corrective activities related to Governance:**

- Sponsor technical assistance



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- Training using trainer suggested by or acceptable to Sponsor
- Workout session held by Sponsor
- Review of and required changes to Code of Regulations, governance policies, or other rules or practices affecting governance
- Recommendations of Sponsor, to be followed by Board, as to any dysfunction and options for resolving the same
- Clear guidance written into policy and adherence to guidance, as to roles and responsibilities
- Required replacement of members demonstrating absenteeism or otherwise hampering business or quorum
- Required agreement of Board to dismiss board members or officers violating policy, law, procedure, rules, the Code or other customary good governance precepts.
- Technical Assistance in procedure, minutes, motions, notices, or similar governance matters

**Responsibilities of the Sponsor in Regards to Corrective Activities:**

1. Review, Approve or Disapprove Corrective Action Plans
2. Require the school to complete the OIP process to address academic deficiencies
3. Provide Technical Assistance resources
4. Place the school into probationary, suspension or termination status when needed

**Comments on Statutory Interventions**

A non-renewal of the Community School's contract may occur in accordance with any cause allowed by Chapter 3314 of the Ohio Revised Code (Code) or the Contract.

***Probation may be used for any cause allowed by the code, including but not limited to:***

- Untimely submissions or lack of cooperation in submissions required by the State or RAA for two or more times per year, or for over 5 business days.
- Lack of compliance with laws or the Contract
- Lack of progress on Academics
- Any fiscal matter of any level of risk
- Governance, administrative or minor financial issues that can be adequately corrected by a Plan to Cure acceptable to Sponsor
- Potential or actual ethics or conflicts violations

***Suspension is more likely used for matters such as, but not limited to:***

- Health or safety matters
- Consistent lack of progress on academics

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- Money owed to the State or its agencies, vendors or RAA that is delinquent, overextended or may or does render insolvency
- Inability to make payroll
- Undisclosed debt or obligations
- Lack of accuracy in or misrepresentation, cheating or fraud in any reporting figures, data, testing results that is not corrected within timeframes allowed by law or which create financial, reputational, governance or academic risk
- Other matters of noncompliance, the magnitude or risk of which may be assessed by Sponsor as good cause or allowed by the Code
- Uncorrected potential or actual ethics or conflict violations
- Inability to meet, or lack of progress in meeting, the terms of the Contract, the laws, rules, regulations or requirements, or the reasonable requests of Sponsor geared to correct deficiencies