

**QUESTIONS FROM THE WEBINAR: SPONSOR COMPLIANCE COMPONENT TRAINING 2015-2016
JULY 6, 2016**

Last week the Ohio Department of Education hosted a webinar on the 2015-2016 compliance with all laws and rules component of the sponsor evaluation. The Office of Community Schools compiled a list of questions from the webinar, along with questions shared directly with office staff. Please send additional questions to Deneice Cooper at Deneice.Cooper@education.ohio.gov.

- 1. Should sponsors place only the Certification documentation items on the sponsor Certification form, or place all 319 items on the form? Is there a list, by school, of items that are not necessary to complete?**

Sponsors must address all 319 items in the sponsor Certification form. For the review, some items will refer to the Certification form only; some to specific documentation; and some are confirmed by the department. Sponsors will find the 2015-2016 list of all laws and rules, the certification form and instructions [here](#).

- 2. *Item #250 – Copy of monthly payment report.* Are sponsors required to print every payment settlement report in order to document school deductions?**

No. The department is changing Item #250. Sponsors do not need to provide documentation, but do need to include Item #250 on the Certification form, like all other items.

- 3. *Item #252 – Copy of OIP and status.* Are sponsors required to print their schools' Ohio Improvement Process status from the CCIP to document progress?**

No. The department is changing Item #252 so that it can be reviewed directly by the compliance reviewers. The sponsor does not need to provide documentation for Item #252, but does need to include this item on the Certification form, like all other items.

- 4. Will the recorded webinar be on ODE's website?**

Yes. [Click here](#) to view the webinar. In addition, [click here](#) for links to the Certification form, instructions on using the Certification form and the Excel spreadsheet listing all laws and rules for the 2015-2016 Compliance review year.

- 5. Are the tasks in Epicenter aligned with the spreadsheet? For example, the third task in Epicenter is to submit an annual report. The third item on the spreadsheet is to verify that the sponsor does not sell goods or services.**

The item *number* in Epicenter aligns with the item number (Column A) on the Excel spreadsheet. Required documentation is listed in Column J. It is best to refer to the item number in Epicenter, not the task order. For instance, the third item in Epicenter is 008, *ORC 3314.28 Sponsor's receipt of the plan by computer-based schools for services to disabled students*. That same requirement is Item #8 on the Excel spreadsheet listing all laws and rules. Item #3 on the list of all laws and rules is a "Certification" item under Column J. It does not appear in Epicenter because the documentation type is certification only.

- 6. On the Compliance Review, where the documentation says, “ODE receipt of notices,” do we upload anything or does ODE verify this?**

If Column J, documentation, states “ODE’s receipt of...” or “ODE’s confirmation of ...”, then no documentation is required. Remember, all items should be placed on the Certification form appropriately, per their compliance status. Please note the response to questions #2 and #3 above.

- 7. In further reviewing the Compliance component spreadsheet and the letter of non-applicable items, an inadvertent error occurred. The first column was used as the number when it should have been the second column as the number of the compliance component item. What steps need to be completed to correct this in Epicenter?**

The Office of Community Schools will “reject” the Certification form and the item will reappear in the sponsor’s task queue. At this time, you will be able to upload the corrected copy.

- 8. In reviewing the 2015-2016 compliance component of the sponsor evaluation process spreadsheet, I notice some of the documentation required are the department’s receipt of items, such as assurances. Where are these located? I have the assurances that we submitted, but I don’t have the department’s receipt of assurances.**

As noted in response to question 6, if an item is confirmed by the department, no submission is required, but all items must be described in the Certification form appropriately regarding their compliance status. The 2015-2016 list of all laws and rules spreadsheet is for your reference only; no further action is required.

- 9. Please clarify necessary action steps for Items #242 and #290. Do you require a copy of the coaches/referees licenses OR evidence that we are reviewing them? Item #290 just states license review, not a copy, which contradicts Item #242.**

Regarding Item #242, *Interscholastic athletics: Parental information about concussion and head injuries; requirements of coaches and referees*, per the spreadsheet, provide the school’s policy, documentation that student records have been reviewed and a copy of the coach’s/referee’s licenses. As you know, coaches and referees are licensed by the Ohio High School Athletic Association.

Item 290, *Qualifications to direct, supervise, or coach a pupil activity program*, calls for a “License Review”; that is, evidence that the sponsor checked that each coach and referee holds a current, appropriate license, which in this case is a “pupil activity permit.” These Items do not necessarily reference the same group of individuals.

- 10. Item #78 – Do you want a copy of the entire employee handbook because it doesn’t just say their policy like other items on the list?**

The item is about ensuring that employees are trained on reporting fraud. If covered in the handbook, then the page would suffice so long as the school’s name is shown clearly on the page. Or if the employee handbook is available on the school’s website, a link to the website page including the appropriate page number would be acceptable.

11. Item #310 – Agreement with data acquisition site – Why does this say Cleveland Schools with Special Circumstances? Our schools all contract with an ITC.

The sub-category is mislabeled; however, the documentation is a copy of the contract with the ITC. Is the ITC contract linkable? If so, provide the link to the contract that includes the year of the review.

12. Are there no documents to upload for the certification of the sponsor's compliance? Are we to only complete the three paragraphs on the certification, sponsor's compliance document without any uploads into Epicenter?

Remember that every item must be described in the Certification form. If the item is not-applicable, the sponsor must describe the reason in a memo on the sponsor's letterhead, including the school's name, (Item #), IRN and fiscal year, along with the reason. If the school is out of compliance with an item, the sponsor must provide documentation of actions taken to bring the school into compliance. These requirements for information are separate from the "documentation" described in Column J.

13. When reviewing the list of laws under documentation the word "certification" appears. I am not sure when you expect for certification. Example Item 81 - Communication with State Auditor - what do you expect in the way of certification for this item? All help would be appreciated.

Under Column J, documentation, for most items, the documentation relies on the sponsor's Certification form. It is expected that the sponsor has back-up documentation to show that it complied with laws and rules pertaining to sponsors, as well as monitored the schools for their compliance for any item for which "Certification" is the required documentation.

Regarding Item 81, if the sponsor certifies that it is in compliance with Item 81 on the Certification form, that means the sponsor attends all meetings between its sponsored schools and the Auditor of State. If the sponsor does not do that, it should list Item 81 under the "not in compliance" paragraph, Part 1, of the Certification form. In the unusual circumstance that the sponsor's community school has not yet been audited, Item 81 would be described under "not-applicable" with a reason provided.

14. Does item #318 apply only to schools that have raffles? Does a school that is a 501(c) 3 that does not conduct raffles need to upload the certificate of federal non-profit status?

Yes. For a school that does not conduct raffles, Item #318 would be "not applicable." Remember that if the item is not-applicable, the reason why it does not apply must be described in a memo on the sponsor's letterhead and include the school's name, item #, IRN, and fiscal year, along with the reason. Please follow the Certification instruction letter on our web-page [here](#).

15. The documents that show proof of a comprehensive plan would include the entire board policy book, the entire course of study, the entire student code of conduct, the contract with the school, the five year forecast, the monthly financial reports, etc. This would be volumes of material. Is that what you are looking for in this item?

No. The referenced comprehensive plan is a required attachment to the charter contract. If the contract that includes the review year is linkable, the sponsor should provide the link to the appropriate website and provide a page range where the comprehensive plan can be found. If the contract is not linkable, the sponsor should upload the comprehensive plan from the appropriate contract.

16. Is it acceptable to use the listings from Epicenter and just indicate if the school was compliant/non-compliant/or if it was not-applicable?

No. All 319 items must be addressed in the sponsor Certification form and some also require submission of documentation. Relying on Epicenter alone for a listing removes about two-thirds of the items. Also remember, if a school-specific item is found by the sponsor to be non-compliant or not-applicable, more information must be provided.

17. Can you address how to provide the corrective action steps for non-compliant certification items? You asked for documentation to be uploaded, should that be simply added into the large certification document? Or is there somewhere else to provide the information?

The sponsor should upload the documentation of corrective action taken following Column J's description for the item that is out of compliance. If the item is listed under Column J as "certification" or "ODE certification," then upload the documentation of corrective action for that school and item in the Epicenter folder 320. If the item is listed under Column J as "documentation," upload the documentation of corrective action in Epicenter under the item number.