2019-2020 Community School Sponsor Evaluation: Compliance Component

Center for Performance and Impact · July 2019
This Training Covers:

1. 2019-2020 changes to “the lists”
2. Sponsor certification determination
3. Evidence submission
4. Validation review process
5. Onsite review
6. Preliminary results and adjustment review
7. Compliance scoring and final results publication
## Sponsor Evaluation: Compliance

### 2019-2020 changes to “the lists”

- Sponsor certification determination
- Evidence submission
- Validation review process
- Onsite review
- Preliminary results and adjustment review
- Compliance scoring and final results publication
Compliance Worksheets - “The Lists”

**ALL** applicable laws and rules

- Community School Sponsors
- Community Schools

Worksheets

- Sponsor
- Oversight of Schools

Numbering system, categories and subcategories

Compliance component questions
How many compliance items are on “the lists” for the 2019-2020 review cycle?

<table>
<thead>
<tr>
<th></th>
<th>2019-2020</th>
<th>2018-2019</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Sponsor Items</td>
<td>School Items</td>
</tr>
<tr>
<td>Total Compliance Items</td>
<td>23</td>
<td>280</td>
</tr>
<tr>
<td>Require Documentation Submission</td>
<td>11</td>
<td>78</td>
</tr>
</tbody>
</table>
Notes on Specific Compliance Items for 2019-2020

Sponsor-level Items:

• S-501 – No sponsor response on worksheet. Sponsor Certified Compliant pending timely submission of expenditure report to the Department.
• S-615 – Calculated by Department, based on sponsor’s compliance oversight of all schools in their portfolio.

School-level Items:

• Item #121 – Not included in the 2019-2020 review; legislative requirement for 2020-2021 review cycle.
• Items #510 and #609 – Removed from worksheet.
• Item #780 – Not included in the 2019-2020 review; computer software not available.

REMINDER: Specific compliance item changes are identified on the change logs posted on the Department’s website.
2019-2020 Compliance Changes – General Overview

- New sponsor-level item added
- Align dates with review cycle
- Several new school-level items
- Updates to logic formulas

**REMINDER:** Specific compliance item changes are identified on the change logs posted on the Department’s website.
2019-2020 Sponsor Evaluation Resources

http://education.ohio.gov/Topics/Community-Schools

NOTE: Per law, the Department is not permitted to make changes to the 2019-2020 sponsor evaluation system after July 15, 2019.
## Sponsor Evaluation: Compliance

### 2019-2020 changes to “the lists”

### Sponsor certification determination

- Evidence submission
- Validation review process
- Onsite review
- Preliminary results and adjustment review
- Compliance scoring and final results publication
Sponsor Compliance Certification Determination

Worksheet columns aid in certification determination by the sponsor

Submit one sponsor worksheet for sponsor-level compliance items

Submit one *Oversight of Schools* worksheet for *each* sponsored school
# Oversight of Schools Spreadsheet

## Worksheet Columns

<table>
<thead>
<tr>
<th>Item Number</th>
<th>ORC Section</th>
<th>ORC 3314 reference</th>
<th>OAC Section</th>
<th>OAC/ORC Section Title</th>
<th>Applies To</th>
<th>Category</th>
<th>Sub-Category</th>
<th>OAC/ORC Effective Date</th>
<th>OAC/ORC Description</th>
</tr>
</thead>
</table>

- **Compliance Component Question 1**
- **Answer to Question 1**
- **Compliance Component Question 2**
- **Answer to Question 2**
- **Certification Determination**
- **Required Documentation**
- **Corrective Action Plan**
- **Answer Regarding CAP**

Oversight of Schools spreadsheet only
## Certification Determination Results

<table>
<thead>
<tr>
<th>Category</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sponsor Certified Compliant</td>
</tr>
<tr>
<td>Sponsor Certified Compliant – Documentation Required</td>
</tr>
<tr>
<td>Sponsor Certified Not Compliant</td>
</tr>
<tr>
<td>Sponsor Certified Not Applicable</td>
</tr>
</tbody>
</table>
## Item Certification

### Single Component Question Example - #171

<table>
<thead>
<tr>
<th>Compliance Component Question 1</th>
<th>Answer to Question 1</th>
<th>Compliance Component Question 2</th>
<th>Answer to Question 2</th>
<th>Certification Determination</th>
<th>Required Documentation</th>
<th>Corrective Action Plan</th>
<th>Answer Regarding CAP</th>
</tr>
</thead>
<tbody>
<tr>
<td>Does the school have written policies and procedures regarding students with disabilities, and ensure that services are provided to the students as required by OAC 3301-51-05?</td>
<td>Yes/No</td>
<td></td>
<td></td>
<td></td>
<td>Copy of applicable policies and procedures</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
### Item Certification

**Single Component Question Example - #171**

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<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

- **Sponsor certified not compliant**
- **Copy of applicable policies and procedures**

If the Certification Determination is Sponsor Certified Not Compliant, did the sponsor previously identify the non-compliance and place the school on a Corrective Action Plan? CAP Copy Required

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[Ohio Department of Education logo]
# Columns Q and R: Corrective Action Plan

<table>
<thead>
<tr>
<th>Certification Determination</th>
<th>Corrective Action Plan</th>
<th>Answer Regarding CAP</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sponsor certified not compliant</td>
<td>If the Certification Determination is <em>Sponsor Certified Not Compliant</em>, did the sponsor previously identify the non-compliance and place the school on a Corrective Action Plan? <em>CAP Copy Required</em></td>
<td>Yes</td>
</tr>
</tbody>
</table>
Reminders about Corrective Action Plans

Should bring school to compliance status by the next review cycle

**MUST** contain:
- Actionable steps
- Dates and deadlines
- Address **SPECIFIC** compliance item

Previously submitted CAPs will be reviewed by evaluators and are included in 2019-2020 review

All CAPs are uploaded to Epicenter under one submission type
### Item Certification

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<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

- **Copy of applicable policies and procedures**
<table>
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<td>Does the school have written policies and procedures regarding students with disabilities and ensures that services are provided to the students as required by OAC 3301-51-05? Yes/No</td>
<td>Yes</td>
<td></td>
<td></td>
<td>Sponsor Certified Compliant – Documentation Required</td>
<td>Copy of applicable policies and procedures</td>
</tr>
</tbody>
</table>

**Item Certification**

**Single Component Question Example - #171**

![Diagram showing the process of answering a compliance question and determining certification.](image)
Is the school a party to an agreement for joint education program(s)?

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<tr>
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<th>Answer to Question 2</th>
<th>Certification Determination</th>
<th>Required Documentation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Is the school a party to an agreement for joint education program(s)?</td>
<td>Yes</td>
<td>If yes, does the school ensure that it does not charge tuition and/or fees to students participating in the joint education program(s)?</td>
<td>Yes</td>
<td>Sponsor Certified Compliant</td>
<td>None</td>
</tr>
</tbody>
</table>
## Item Certification

### Double Component Question Example - #102

<table>
<thead>
<tr>
<th>Compliance Component Question 1</th>
<th>Answer to Question 1</th>
<th>Compliance Component Question 2</th>
<th>Answer to Question 2</th>
<th>Certification Determination</th>
<th>Required Documentation</th>
<th>Corrective Action Plan</th>
<th>Answer Regarding CAP</th>
</tr>
</thead>
<tbody>
<tr>
<td>Is the school a party to an agreement for joint education program(s)? Yes/No</td>
<td>Yes</td>
<td>If yes, does the school ensure that it does not charge tuition and/or fees to students participating in the joint education program(s)? Yes/No</td>
<td>No</td>
<td>Sponsor Certified Not Compliant</td>
<td>None</td>
<td>If the Certification Determination is Sponsor Certified Not Compliant, did the sponsor previously identify the non-compliance and place the school on a Corrective Action Plan? CAP Copy Required</td>
<td></td>
</tr>
</tbody>
</table>
## Item Certification

### Double Component Question Example - #102

<table>
<thead>
<tr>
<th>Compliance Component Question 1</th>
<th>Answer to Question 1</th>
<th>Compliance Component Question 2</th>
<th>Answer to Question 2</th>
<th>Certification Determination</th>
<th>Required Documentation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Is the school a party to an agreement for joint education program(s)? Yes/No</td>
<td>No</td>
<td>If yes, does the school ensure that it does not charge tuition and/or fees to students participating in the joint education program(s)? Yes/No</td>
<td>No</td>
<td>Sponsor Certified Not Applicable</td>
<td>None</td>
</tr>
</tbody>
</table>
AND...
<table>
<thead>
<tr>
<th>Compliance Component Question 1</th>
<th>Answer to Question 1</th>
<th>Compliance Component Question 2</th>
<th>Answer to Question 2</th>
<th>Certification Determination</th>
<th>Required Documentation</th>
<th>Corrective Action Plan</th>
<th>Answer Regarding CAP</th>
</tr>
</thead>
<tbody>
<tr>
<td>Did the school have any cases of truancy? Yes/No</td>
<td>If yes, did the attendance officer institute proceedings for violations of compulsory education laws AND keep records? Yes/No</td>
<td></td>
<td></td>
<td></td>
<td>None</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

None
<table>
<thead>
<tr>
<th>Compliance Component Question 2</th>
<th>Answer to Question 2</th>
</tr>
</thead>
<tbody>
<tr>
<td>If yes, <strong>did the attendance officer institute proceedings for violations of compulsory education laws</strong> AND keep records? Yes/No</td>
<td></td>
</tr>
<tr>
<td>Compliance Component Question 2</td>
<td>Answer to Question 2</td>
</tr>
<tr>
<td>---------------------------------</td>
<td>----------------------</td>
</tr>
<tr>
<td>If yes, <strong>did the attendance officer institute proceedings for violations of compulsory education laws AND keep records?</strong> Yes/No</td>
<td></td>
</tr>
</tbody>
</table>
## Item Certification - AND

<table>
<thead>
<tr>
<th>Compliance Component Question 2</th>
<th>Answer to Question 2</th>
</tr>
</thead>
<tbody>
<tr>
<td>If yes, did the attendance officer institute proceedings for violations of compulsory education laws AND keep records? Yes/No</td>
<td>Yes + Yes = Yes</td>
</tr>
</tbody>
</table>
## Item Certification - AND

<table>
<thead>
<tr>
<th>Compliance Component Question 2</th>
<th>Answer to Question 2</th>
</tr>
</thead>
<tbody>
<tr>
<td>If yes, did the attendance officer <strong>institute</strong> proceedings for violations of compulsory education laws AND keep records? Yes/No</td>
<td>No + No = No</td>
</tr>
<tr>
<td>Compliance Component Question 2</td>
<td>Answer to Question 2</td>
</tr>
<tr>
<td>---------------------------------</td>
<td>----------------------</td>
</tr>
<tr>
<td>If yes, did the attendance officer institute proceedings for violations of compulsory education laws AND keep records? Yes/No</td>
<td>Yes + No = No</td>
</tr>
</tbody>
</table>
## Item Certification - AND

<table>
<thead>
<tr>
<th>Compliance Component Question 2</th>
<th>Answer to Question 2</th>
</tr>
</thead>
<tbody>
<tr>
<td>If yes, did the attendance officer institute proceedings for violations of compulsory education laws AND keep records? Yes/No</td>
<td>No + Yes = No</td>
</tr>
</tbody>
</table>
OR...
## Item Certification – OR

Sponsor-Level Item S-605

<table>
<thead>
<tr>
<th>Compliance Component Question 1</th>
<th>Answer to Question 1</th>
<th>Compliance Component Question 2</th>
<th>Answer to Question 2</th>
<th>Certification Determination</th>
<th>Required Documentation</th>
<th>Corrective Action Plan</th>
<th>Answer Regarding CAP</th>
</tr>
</thead>
<tbody>
<tr>
<td>Did you open or are you planning to open a new or conversion community school during the current school year? Yes/No</td>
<td>If yes, did you receive a proposal and enter into a preliminary agreement pursuant to ORC 3314.015 OR are you exempt from this provision? Yes/No</td>
<td></td>
<td></td>
<td></td>
<td>Explanation of exemption, if applicable</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

---

Ohio Department of Education
<table>
<thead>
<tr>
<th>Compliance Component Question 2</th>
<th>Answer to Question 2</th>
</tr>
</thead>
<tbody>
<tr>
<td>If yes, did you receive a proposal and enter into a preliminary agreement pursuant to ORC 3314.015 OR are you exempt from this provision? Yes/No</td>
<td>Yes OR Yes = Yes</td>
</tr>
</tbody>
</table>
Sponsor Evaluation: Compliance

2019-2020 changes to “the lists”

Sponsor certification determination

Evidence submission

Validation review process

Onsite review

Preliminary results and adjustment review

Compliance scoring and final results publication
Uploading Evidence to Epicenter

**Document submission window**
- December 2019 – June 30, 2020

**Certification only items**
- “None” in the Required Documentation column – no Epicenter submission

**Required Documentation items**
- “Sponsor Certified Compliant – Documentation Required” – submission in Epicenter required
- If not applicable, enter narrative in Epicenter to satisfy the requirement and remove from sponsor’s task queue

**Corrective action plan(s)**
- One submission type in Epicenter for schools for items certified as Not Compliant
- Enter narrative for a specific item if documentation is required to satisfy requirement and remove from sponsor’s task queue

**Confidential personally identifiable information?**
- STOP!!! Do not upload ANY student personally identifiable information!
- Questions? Contact the Department PRIOR to uploading documentation to Epicenter.

December 2019 - June 30, 2020
Reminders: Evidence Submission

• Required submission types are listed in the sponsor’s task queue.

• Ensure the correct documentation is uploaded to the appropriate submission type.

• Documents can be replaced (if needed) until the document submission deadline.

• Ensure uploaded files can be opened, are easy to read and in the appropriate format.

• Use **ONLY** the compliance worksheets that are provided by the Department.

• Technical difficulties? Contact the Department and/or the Epicenter Help Desk!
Sponsor Certification

- Sponsor worksheet - One per sponsor
- Oversight of Schools - One for each school in sponsor's portfolio

Certification form
- Upload to Epicenter AFTER all worksheets have been uploaded and the form has the signature of an authorized sponsor representative

Compliance Worksheets

Vendor Review
- Worksheets
- CAPs
- Validation
- Onsite reviews
Sponsor Evaluation: Compliance

- 2019-2020 changes to “the lists”
- Sponsor certification determination
- Evidence submission
  - Validation review process
    - Onsite review
      - Preliminary results and adjustment review
      - Compliance scoring and final results publication
Compliance Validation and Onsite Reviews

OAC 3301-102-08

Allows Department validation of compliance items

Randomly selected for BOTH sponsor-level and school-level compliance items

- Onsite review and/or documentation review
- Sponsors with multiple schools could have different items selected for each sponsored school

Items selected for validation

- Possible pool posted to Department website
- Selected items will be announced after June 30, 2020 (submission deadline)

Onsite reviews

Random selection of 10 percent of schools in sponsor portfolio
- Each school type included
- Selected schools will be announced after June 30, 2020 (submission deadline)
Reminders: Onsite Reviews

**BOTH** the schools and the validation items selected for each school will be published after the submission deadline.

• For items where validation will occur onsite: Notification will occur after scheduling, but before visit.

Representatives from the sponsoring organization are permitted to attend the onsite review. However, **ONLY** the school should respond to the evaluator and provide requested documentation.
Sponsor Evaluation: Compliance

2019-2020 changes to “the lists”

Sponsor certification determination

Evidence submission

Validation review process

Onsite review

Preliminary results and adjustment review

Compliance scoring and final results publication
## Preliminary Evaluation Results: Adjustment Review

**ORC 3314.016(B)**

<table>
<thead>
<tr>
<th>Sponsor Evaluation Components</th>
<th>Academic Quality Practices</th>
<th>Compliance with all Laws and Rules</th>
</tr>
</thead>
</table>
Preliminary Compliance Results

Accessible via Epicenter

Two submission types:

- Sponsor file
- Oversight of Schools file

Available files

- Sponsor
- Oversight of Schools
Adjustment Review Period

10 business days

Sponsor Adjustment Request Form
- Submitted in Epicenter
- Contains three tabs:
  - Sponsor Quality
  - Sponsor Compliance
  - School Compliance

Department review and final determination
Compliance Process

- 2019-2020 changes to “the lists”
- Sponsor certification determination
- Evidence submission
- Validation review process
- Onsite review
- Preliminary results and adjustment review

Compliance scoring and final results publication
Compliance Scoring

<table>
<thead>
<tr>
<th>Reviewer Response to Initial Score</th>
<th>Final Reviewer Rating</th>
<th>Justification</th>
</tr>
</thead>
<tbody>
<tr>
<td>Compliant</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Not Compliant</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Not Applicable</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Compliance Scoring

Vendor Determination + Adjustment Results

Compliant
Not Compliant
Not Applicable

Sponsor (S-615)

Percentage of substantiated items

Oversight of schools (ALL)

Final compliance component score/rating
Sponsor Item S-615

Weighted (0 to 4 points)

- Percentage of substantiated items
- Incorporates 280 school-level items for **ALL** schools in sponsor portfolio
## School-Level Scoring (S-615)

<table>
<thead>
<tr>
<th>Points</th>
<th>Percentage of Substantiated Items</th>
</tr>
</thead>
<tbody>
<tr>
<td>4</td>
<td>98-100%</td>
</tr>
<tr>
<td>3</td>
<td>96-97.9%</td>
</tr>
<tr>
<td>2</td>
<td>94-95.9%</td>
</tr>
<tr>
<td>1</td>
<td>92-93.9%</td>
</tr>
<tr>
<td>0</td>
<td>Less than 92%</td>
</tr>
</tbody>
</table>

The school-level percentage of substantiated items determine the points a sponsor receives for Item S-615 at the sponsor level.
## Overall Compliance Component Rating

<table>
<thead>
<tr>
<th>Points</th>
<th>Percentage of Compliant Items</th>
<th>2019-2020 Rating</th>
</tr>
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<tbody>
<tr>
<td>4</td>
<td>92-100%</td>
<td>Exceeds Expectations</td>
</tr>
<tr>
<td>3</td>
<td>87-91.9%</td>
<td>Meets Expectations</td>
</tr>
<tr>
<td>2</td>
<td>84-86.9%</td>
<td>Progressing Toward Expectations</td>
</tr>
<tr>
<td>1</td>
<td>80-83.9%</td>
<td>Below Expectations</td>
</tr>
<tr>
<td>0</td>
<td>0-79.9%</td>
<td>Significantly Below Expectations</td>
</tr>
</tbody>
</table>

Score is determined by equally weighing 22 of the 23 sponsor-level items (1 point each), and weighing S-615 (0 to 4 points).
Final Ratings and Publication

Mid to late September 2020

Window for the Department to release preliminary 2019-2020 sponsor ratings

Adjustment Request Period

10 business days from the release of the preliminary ratings

Review & Calculate Final Results

Department review of submitted adjustment requests, final calculations and conduct QA

Nov. 15

Available on Department website, Emailed individually, and Epicenter
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Questions?

Submit questions to the Sponsor Evaluation inbox:
sponsor.evaluation@education.ohio.gov
Join the Conversation

OHEducation

@OHEducation

@OHEducationSupt

@OHEducation

OhioEdDept

education.ohio.gov/text