## Sponsor Evaluation: Compliance Component

<table>
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<td>Changes to 2020-2021 compliance process</td>
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<td>Validation review process</td>
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<td>Preliminary results and adjustment review</td>
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<td>Compliance calculations and publication of the final results</td>
</tr>
</tbody>
</table>
Changes to 2020-2021 Compliance Process

• New compliance items

• Edits to compliance items

• Certification-only method

• Worksheet Efficiency Chart
Compliance Certification Worksheets – “The Lists”

- All applicable laws and rules
  - Community School Sponsors
  - Community Schools

- Compliance Certification Worksheets
  - Sponsor
  - Oversight of Schools

- Numbering system, categories, and sub-categories

- Compliance Component Questions
2020-2021 Sponsor Evaluation Resources

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

NOTE: By law, the Department is not permitted to make changes to the 2020-2021 sponsor evaluation system after July 15, 2020.
Community School Sponsors Exempt from 2020-2021 Sponsor Evaluation Review

For sponsors that are exempt from the sponsor evaluation review for the 2020-2021 review cycle per ORC 3314.016(B)(7)(b), documentation must be maintained as required by law for audit purposes and to fulfill their legal responsibilities for their sponsored schools.

Community school sponsors must ensure their schools are adhering to ALL applicable laws and rules regardless of their participation status in the sponsor evaluation review process.
Sponsor Compliance Certification Determination

Worksheet columns aid in compliance certification determination by the sponsor

Upload **one** *Sponsor* worksheet for sponsor-level compliance items

Upload **one** *Oversight of Schools* worksheet for **each** sponsored school for school-level compliance items
## Worksheet Columns: Oversight of Schools/Sponsor

<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**
- **Corrective Action Plan**
- **Answer Regarding CAP**

Oversight of Schools spreadsheet only
Certification Determination Results

- Sponsor Certified Compliant
- Sponsor Certified Not Compliant
- Sponsor Certified Not Applicable
Compliance 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>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 ensures that services are provided to the students as required by OAC 3301-51-05? Yes/No</td>
<td>No</td>
<td></td>
<td>Sponsor Certified Not Compliant</td>
<td></td>
<td></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>
</tr>
</tbody>
</table>
## 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 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>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 2020-2021 review

All CAPs are uploaded to Epicenter under one submission type
## Compliance 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>
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<tbody>
<tr>
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<td>Yes</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Yes
## Compliance 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>
</tr>
</thead>
<tbody>
<tr>
<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</td>
</tr>
</tbody>
</table>

Ohio Department of Education
### Compliance 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>
</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>Yes</td>
<td>Sponsor Certified Compliant</td>
</tr>
</tbody>
</table>

- **Sponsor Certified Compliant**
<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>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>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>
<tr>
<td>Compliance Component Question 1</td>
<td>Answer to Question 1</td>
<td>Compliance Component Question 2</td>
<td>Answer to Question 2</td>
<td>Certification Determination</td>
<td></td>
<td></td>
</tr>
<tr>
<td>----------------------------------</td>
<td>----------------------</td>
<td>----------------------------------</td>
<td>----------------------</td>
<td>-----------------------------</td>
<td></td>
<td></td>
</tr>
<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></td>
<td></td>
</tr>
</tbody>
</table>
### Compliance Item Certification – AND

### Oversight of Schools Item #402

<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>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></td>
<td></td>
</tr>
<tr>
<td>Compliance Component Question 2</td>
<td>Answer to Question 2</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>--------------------------------</td>
<td>----------------------</td>
<td></td>
<td></td>
<td></td>
<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></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Compliance Component Question 2</td>
<td>Answer to Question 2</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>---------------------------------</td>
<td>----------------------</td>
<td></td>
<td></td>
<td></td>
<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></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
## Compliance 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><strong>Yes</strong> + <strong>Yes</strong> = <strong>Yes</strong></td>
</tr>
</tbody>
</table>
Compliance 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 + No = No</td>
</tr>
</tbody>
</table>
**Compliance 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 proceedings for violations of compulsory education laws</strong> AND keep records? Yes/No</td>
<td>Yes + No = No</td>
</tr>
</tbody>
</table>

If yes, did the attendance officer institute proceedings for violations of compulsory education laws AND keep records? 

Yes/No

Yes + No = No
### Compliance 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>
**Compliance 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>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 3314.01? Yes/No</td>
<td>OR</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Compliance Component Question 2</td>
<td>Answer to Question 2</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>------------------------------------------------------------------------------------------------</td>
<td>----------------------</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>If yes, <strong>did you receive a proposal and enter into a preliminary agreement</strong> pursuant to ORC 3314.015 OR are you exempt from this provision? Yes/No</td>
<td><strong>Yes</strong> OR <strong>No</strong> = <strong>Yes</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Worksheet Efficiency Chart

• Batch-filled responses to Question 1 on compliance items
  o Have similar Question 1 criteria (and thereby can be grouped together)
  o Have a response of “No” to Question 1 (and are therefore not applicable to the school)

• Sponsor must answer questions through the chart that precedes the actual worksheet items

• If entry is made directly into the answer cell for any listed compliance item or an answer is deleted, *the auto-fill formula will no longer be active for that item*

• Items included in the batch fills are indicated on the Worksheet Efficiency Chart

• Using auto-fill DOES NOT release the sponsor from its responsibility to review all laws and rules or to ensure that the worksheet has been accurately completed
## Worksheet Efficiency Chart

**Worksheet Efficiency**

Answering the questions below will batch-fill the answer to Question 1 on identified items for which the item would be Not Applicable based on that answer. The item questions that may be affected by batch-fill are highlighted in pale yellow throughout the worksheet.

**NOTE:** If the answer is deleted in the Efficiency area, the auto-filled answer will be deleted from all associated items. If an entry is made directly into the answer cell for any listed item or an answer is deleted, the batch-fill formula will no longer be active for that item.

**NOTE:** This method of batch-filling the answer to Question 1 for identified items is offered as an efficiency for items that may not apply to the school being reviewed. It does NOT release the sponsor from its responsibility to review all laws and rules or ensure that the worksheet has been accurately completed.

<table>
<thead>
<tr>
<th>Question</th>
<th>Item</th>
<th>Number of Affected Items</th>
<th>Items to which the Answer to Compliance Component Question 1 will be Copied</th>
<th>Compliance Component Efficiency Question</th>
<th>Answer to Efficiency Question</th>
</tr>
</thead>
<tbody>
<tr>
<td>Q1</td>
<td>Internet or Computer-Based School</td>
<td>11</td>
<td>106, 125, 186, 218, 219, 302, 317, 430, 437, 953</td>
<td>Is the school an internet or computer-based school? Yes/No</td>
<td></td>
</tr>
<tr>
<td>Q2</td>
<td>Site-based School</td>
<td>3</td>
<td>110, 301, 408, 957</td>
<td>Is the school a site-based school? Yes/No</td>
<td></td>
</tr>
<tr>
<td>Q3</td>
<td>School with Grades 6 or Greater</td>
<td>2</td>
<td>111, 112</td>
<td>Does the school offer grades 6 or greater? Yes/No</td>
<td></td>
</tr>
<tr>
<td>Q4</td>
<td>School Serves Grade 3</td>
<td>2</td>
<td>116, 117</td>
<td>Does the school serve grade 3</td>
<td></td>
</tr>
<tr>
<td>Q5</td>
<td>School Offers Grades 9-12? High School / Secondary School</td>
<td>17</td>
<td>119, 122, 123, 126, 128, 131, 137, 156, 157, 158, 160, 161, 162, 163, 165, 167, 956</td>
<td>Does the school serve any of the grades 9-12 (high school, secondary school)? Yes/No</td>
<td></td>
</tr>
<tr>
<td>Q6</td>
<td>School Offers Preschool</td>
<td>5</td>
<td>147, 149, 150, 627, 635</td>
<td>Does the school offer preschool? Yes/No</td>
<td></td>
</tr>
<tr>
<td>Q7</td>
<td>School Holds a Credit Card Account</td>
<td>5</td>
<td>522, 523, 524, 525, 526</td>
<td>Does the school hold a credit card account? Yes/No</td>
<td></td>
</tr>
<tr>
<td>Q8</td>
<td>School Provides Transportation</td>
<td>19</td>
<td>637, 638, 639, 640, 401, 803, 884, 885, 886, 887, 888, 889, 890, 810, 811, 813, 814, 815, 816, 818</td>
<td>Does the school (not the local district), or its employees of the school or contracted vendors provide transportation for any of its students? Yes/No</td>
<td></td>
</tr>
</tbody>
</table>

**Put answers for Q1 – Q8 in this column**
Certification-Only Process

• Sponsors submit only the completed worksheets by specified deadline.

• After the worksheet submission deadline, the Department provides sponsors with a list of items for which sponsors must provide documented evidence for validation.

• Sponsors would then submit documented evidence for the selected items; this could also include onsite reviews at the school.

• Reviewers will examine submitted documents to carry out the validation process.
Certification-Only Process

- **June 30, 2021:** Deadline for sponsors to submit completed certification worksheets

- **July 1, 2021:** The Department releases the vendor’s list of randomly-selected validation items to sponsors and schedules the items for Epicenter submission

- **July 23, 2021:** Deadline for sponsors to submit documentation for selected validation items
Validation Items

• 30 school-level items will be selected for validation
  o Some items will be validated by documentation submitted by the sponsor
  o Some items will be validated based on data available at the Department
• Only for schools selected for site visits, 5 school-level items will be selected for validation on site

• 6 sponsor-level items will be selected for validation
Submitting Documentation to Epicenter

Items selected for validation - documentation required

- Items that are on the list released by the Department on July 1 for which sponsors must submit documentation in Epicenter
- If not applicable or not compliant, enter narrative in Epicenter to satisfy the requirement and remove from sponsor's task queue
- If not compliant, a corrective action plan can be submitted, if the sponsor placed the school on one

Items selected for validation - no documentation required

- For some of the items, the Department will use documentation that is already available to validate sponsors' certifications
- No documentation submission is required for items selected for onsite visits

Corrective action plan(s)

- One submission type in Epicenter for ALL schools for items certified as Not Compliant

Contain confidential personally identifiable information?

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

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

Compliance Worksheets
- Sponsor worksheet - One per sponsor
- Oversight of Schools - One for each school in sponsor’s portfolio

Vendor Review
- Worksheets
- CAPs
- Validation
- Onsite reviews
Compliance Validation Process & Onsite Reviews

OAC 3301-102-08
- Allows Department validation of compliance Items

Randomly selected for BOTH sponsor-level and school-level compliance items
- Include onsite review and/or documentation review
- Community school sponsors with multiple schools could have different compliance items selected for each sponsored school

Items selected for validation
- Possible pool posted to the Department website
- Selected items will be announced after the June 30, 2021 submission deadline

Onsite reviews
- Random selection of 10 percent of schools in sponsor portfolio
  - Each type included
  - Selected schools will be announced after the June 30, 2021 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.
Preliminary Sponsor Evaluation Rating Results: Adjustment Review

ORC 3314.016(B)

Sponsor Evaluation Components
• Academic Performance of Sponsored Schools
• Adherence to Quality Practices
• Compliance with All Applicable Laws and Rules
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 four tabs:
  - Sponsor Academic
  - Sponsor Quality
  - Sponsor Compliance
  - School Compliance

Department review and final determination
<table>
<thead>
<tr>
<th>Reviewer Response to Initial Score</th>
<th>Final Reviewer Rating</th>
<th>Justification</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Compliant  
Not Compliant  
Not Applicable
Compliance Component Calculations

- Compliant
- Not Compliant
- Not Applicable
- Sponsor (S-615)
- Percentage of Substantiated Compliance Items
- Final Compliance Component Score/Rating

Vendor Determination + Adjustment Results

Oversight of Schools (ALL)
Sponsor Item S-615

Weighted (0 to 4 points)

• Percentage of substantiated items
• Incorporates all 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>2020-2021 Rating</th>
</tr>
</thead>
<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 2021
- Window for the Department to release preliminary 2020-2021 sponsor ratings

Late September to Early October 2021
Adjustment Request Period
- 10 business days from the release of the preliminary ratings

Mid October to November 2021
Review & Calculate Final Results
- Department review of submitted adjustment requests, final calculations and conduct QA

November 15, 2021
- Final ratings are publicly available on Department’s website, e-mailed individually to community school sponsors, and are also available in Epicenter
Questions?

Submit questions to the Sponsor Evaluation mailbox:

sponsor.evaluation@education.ohio.gov
Share your learning community with us!

#MyOhioClassroom

Celebrate educators!

#OhioLovesTeachers