

Attachment 4: Accountability Plan and Intervention Protocol

Pursuant to the Sponsorship Contract, the Performance Framework enclosed herein ensures that each CMSD-sponsored charter school provides high-quality education to their students. The Framework includes the academic, organizational, and financial standards by which sponsored schools will be evaluated.

The Performance Framework will be used to evaluate whether a charter school’s contract should be renewed. It will also be used throughout the life cycle of the school to communicate the school’s performance to its staff, governing authority, sponsor, and other stakeholders. The Framework will provide the basis of the annual report that CMSD must provide annually to the Ohio Department of Education.

In addition to establishing performance criteria for charter schools, the Cleveland Metropolitan School District performance framework holds the Cleveland Metropolitan School District accountable to charter schools. The Cleveland Metropolitan School District is accountable for implementing a rigorous and fair oversight process that respects the autonomy that is vital to charter school success.

It is this *mutual obligation* that drives the Cleveland Metropolitan School District Performance Framework– a collaborative effort with the common objective of providing Ohio students with a high quality education that prepares them for post-graduation academic and career success.

Finally, the Performance Framework is a living document, subject to continuous review and improvement.

TABLE OF CONTENTS

Section	Page
Part 1: Academic Performance Framework	2
Part 2: Financial Performance Framework	8
Part 3: Organizational Performance Framework	13
Part 4: Intervention Protocol	21

Part 1: Academic Performance Framework

Pursuant to the Sponsorship Contract, the Accountability Frameworks include the agreed-upon goals that the Governing Authority and Sponsor will use to evaluate the performance of the Community School during the term of this contract.

Guiding Principles of the Framework

- 1) The framework meets state expectations for how authorizers/sponsors hold their schools accountable:
 - a. The framework considers all report card measures and subgroup performance by including the summative Academic Performance grade a school receives.
 - b. The framework considers in particular student performance, student growth, and attendance. These measures provide a sense of proficiency, growth, and school culture respectively.
 - c. The Gap Closing measure from the report card is used to set specific proficiency targets for subgroups.
 - d. The framework compares the performance of schools to state standards as well as to schools serving similar student populations (based on mobility rates, percent of special education students, and percent of limited English proficiency students).
- 2) The framework recognizes schools that exceed or meet standards, while also fairly evaluating and taking account of progress made by schools that do not meet standards.
- 3) The framework provides a dashboard of information that provides information on how schools are performing during the term of their contract.
- 4) The same framework can be applied to multiple schools allowing for an even playing field.

Framework Indicators

In order to meet guiding principles outlined, the framework looks at the same indicators in multiple ways. It is tiered, looking at an overall report card indicator, primary indicators of performance and secondary indicators of performance.

To be considered for contract renewal, the Governing Authority is expected to have met or exceeded the either the report card indicator or the primary academic indicators, as specified herein. Secondary indicators will be considered as well, but performance on the report card and primary indicators will factor more heavily into decisions about renewal or non-renewal, as well as decisions regarding probation, suspension, and termination. Any school that meets the report card or primary indicators

will be considered to be meeting the minimum academic expectations of the sponsor with regards to academic performance.

The decision tree below shows a high level view of how the framework operates.

1. Consider a school's summative Academic Performance score (the Report Card Indicator).
 - a. If a school meets or exceeds the overall Report Card indicator, STOP. The school's score is based on the Report Card indicator.
 - b. If a school receives a 'does not meet', continue with the decision tree.
2. Consider school performance along all three primary indicators.
 - a. If a school 'exceeds' or 'meets' the primary indicator for a particular metric, STOP. The school's score will be based on the primary indicator.
 - b. If a school receives a 'does not meet' or 'falls far below' for a particular metric, continue with the decision tree.
3. Consider the school's target for the particular metric.
 - a. If a school equals or exceeds the target, STOP. The school receives a rating of 'meets' for this metric.
 - b. If the school does not equal or exceed the target, continue with the decision tree.
4. Consider the school's performance on the metric compared to similar schools.
 - a. The school receives a final score based on how far above average they are on this metric, when compared to other similar schools.
 - i. Schools far above average 'exceed' the standard
 - ii. Schools above average 'meet' the standard
 - iii. Schools below average 'do not meet' the standard
 - iv. Schools far below average 'fall far below' the standard

Ratings on all of the indicators will be provided to a school every year. While the primary and secondary indicators may not be used to evaluate a school, depending on their performance on the report card indicator, the primary and secondary indicators provide useful information that contextualizes a school's information. This data can be used in conversations between the sponsor and school to monitor progress and help ensure all schools are on track to meet or exceeds standards at the time of contract renewal.

Report Card Indicator

Complete details of this indicator can be found in the Technical Documentation for Community School Sponsor Evaluation. A summary is provided below.

A school receives a weighted points total based on the grade a school received on the report card component and the weight given to that component. The Total Weighted Points will be converted to a

0 to 4 scale (this scale is the equivalent of the A-F report card grade, which will be published for each school), as provided in the following table:

Overall Academic Performance Score	
Total Weighted Points	Report Card Grade Equivalent
4.125-5.000	4 (A)
3.125-4.124	3 (B)
2.125-3.124	2 (C)
1.125-2.124	1 (D)
0-1.124	0 (F)

Schools receiving a report card equivalent grade of A are considered to be **Exceeding Standards**. Schools receiving a report card equivalent grade of B or C are considered to be **Meeting Standards**. Schools receiving a report card equivalent grade of D are considered to be **Not Meeting Standards**. Schools receiving a report card equivalent grade of F are considered to be **Falling Far Below Standards**.

Primary Indicators

Four primary indicators are utilized: one year value-add, performance index, gap closing, and attendance rates. The cut points for ratings on these indicators are determined based on state grading standards. One-year value-add is used rather than the three year average to provide a more real-time view of how a school performed in a given year.

	Exceeds	Meets	Does Not Meet	Falls Far Below
Value-Add	A	B or C	D	F
Performance Index	A or B	C	D	F
Gap Closing	A or B	C	D	F
Attendance	94% or above	93% to 93.99%	90% to 92.99%	Below 90%

Secondary Indicators

The secondary indicators compare the performance indicator and one-year value-add score for each CMSD-sponsored school to a comparison group of Ohio charter schools. Each CMSD-sponsored school has been placed in a peer group with no more than 10 other Ohio charter schools that are similar to the school in terms of percentage of special education students, economically disadvantaged students, and mobile students.

CMSD expects all of its schools to work toward continual improvement, even if they are already meeting state standards. Thus, for schools that are meeting the report card indicator or primary indicators in value-add and performance index, these secondary indicators will set reasonable targets based upon comparable schools to monitor continuous improvement. While these targets will not always be used in an evaluation of a school, depending on if a school meets standards according to the primary indicators, they can provide schools with information on what their overtime trends are. For schools that are not meeting or exceed the primary indicators, these secondary indicators will help the Sponsor and the Governing Authority gauge progression toward those state goals.

Each year, CMSD and the Governing Authority will meet to discuss performance on the Academic Framework. The comparison schools and the goals will be adjusted accordingly, based on the most recent data from the state report cards.

The goals for secondary indicators for each non-dropout recovery, CMSD-sponsored school are set forth on the following page. Targets are created using the previous year data, so that schools know ahead of time what they should aim for in the coming year. Targets work by first identifying how much a measure varies within a peer group of schools. Targets are then derived by taking a school's performance and adding 0.5 of a standard deviation. Statistical convention has shown that movements of 0.5 standard deviations or more are substantively large. Generally, depending on where a school sits compared to its peer group, there will also be evidence that other schools performed at this level.

In some cases, a school will be the highest performer among its peers and also at an absolute level. In such cases, it is both unlikely and unreasonable to expect a school to grow more. For example, a school with a value-add score of 5.3 is far above expectations from an absolute standpoint and it is potentially difficult to meet a target set above this value. In cases where schools do not meet their target, the sponsor will consider how far above the average a school is compared to their peers. In this way, the framework ensures that schools that might not meet their targets are not penalized if they are among the best performers on that indicator, when compared to similar schools. The formula for calculating this score is $(\text{School Performance} - \text{Peer Average Performance}) / \text{Peer Standard Deviation}$.

Peer comparison scores translate into ratings as follows:

Greater than .68 – Exceeds Standard

Between 0 and 0.68 – Meets Standard

Between 0 and -0.68 – Does not Meet Standard

Less than -0.68 – Falls far below Standard

These cut points roughly divide the distribution into quartiles, so that schools in the top 50% are meeting the standard.

CMSD Alternative Academic Accountability Frameworks

Schools with students only in grades K-3 or newly opened schools that are phasing into a K8 model pose a challenge in the above academic framework. Since most state report card measures are not available for grades K-3, the framework above is inappropriate. In these cases, CMSD has developed an alternative framework for these types of schools to use. In cases where a school might start with non-accountable grades but will eventually phase in more grades over time, the alternative framework will apply when a school only has a K-3 grade band. Once a school includes a 4th grade, the primary Academic Accountability Framework will be used.

The Alternative Academic Accountability Framework tries to hold to the same principles as the primary framework, with an emphasis on measures of proficiency, growth, and attendance. The measures below provide a general framework and target suggestions for schools. However, in cases of very small n-sizes, these percentages may not be appropriate or applicable. Baseline data from each school will be examined to ensure targets are appropriate and achievable for schools. The targets below may be adjusted on a school by school basis to fit their context and baseline.

The Ohio Diagnostic Assessment in Reading (both the Screener and Full Measure) is the source data for these measures.

Proficiency Goal

Meets Expectations: From fall (Screener assessment) to spring (Full Measure assessment) the percentage of accountable students on track to meet the third-grade reading guarantee will increase by 21% or more.

Partially Meets Expectations: From fall (Screener assessment) to spring (Full Measure assessment) the percentage of accountable students on track to meet the third-grade reading guarantee will increase by 1-20%.

Does Not Meet Expectations: From fall (Screener assessment) to spring (Full Measure assessment) the percentage of accountable students on track to meet the third-grade reading guarantee stays the same or decreases.

Growth Target for 2015-16 and 2016-17

Meets Expectations: From fall (Screener assessment) to spring (Full Measure assessment) 50% or more of accountable students improve from off-track to on-track for the third grade reading guarantee.

Partially Meets Expectations: From fall (Screener assessment) to spring (Full Measure assessment) 26% to 49% of accountable students improve from off-track to on-track for the third grade reading guarantee.

Does Not Meet Expectations: From fall (Screener assessment) to spring (Full Measure assessment) less than 25% of accountable students improve from off-track to on-track for the third grade reading guarantee.

Attendance Rate

Meets Expectations: Attendance rate meets or exceeds 93 percent

Does Not Meet Expectations: Attendance rate is less than 93 percent

Cleveland Metropolitan School District 2017-2018 School Year

Part 2. Financial Performance Framework

The purpose of the CMSD Financial Performance Framework is to measure and evaluate the financial health of all CMSD sponsored charter schools. The framework is an accountability tool that will be used on a monthly basis, as required by law, to guide discussions between CMSD and CMSD sponsored charter schools. The monthly meetings regarding the framework are not summative, but rather provide the basis for discussions. School ratings on the financial framework will be published annually and submitted to the school's governing authority, parents, and the Ohio Department of Education, pursuant to section 3301-102-05 of the Ohio Administrative Code.

CMSD will provide monthly written reports with feedback and proactive recommendations, as appropriate, that help the schools achieve greater efficiencies or that result in timely interventions, if needed. Collecting this data is paramount to ensuring that each sponsored school maintains the public trust and its fiduciary responsibility by maintaining a quality school that spends public funds appropriately and adheres to the laws, rules, and charter requirements as governed by their respective boards.

The measures in this framework are designed to be complementary; no single measure provides a full picture of the financial health of a school. Together, however, the measures provide a comprehensive assessment of the school's financial health and viability based on a school's historic trends, near-term financial situation, and future viability.

It is important to note that if a school receives a "concern" or "below standard" rating, it may or may not be in financial distress. The Financial Performance Framework is meant to flag any areas for further investigation. In the event an area is flagged, the Sponsor may request additional documentation from a school. The rating may be adjusted if sufficient evidence is provided. An example of additional information taken into consideration for rating purposes could be a long-term strategic partnership that acts as an additional funding source for the school. The Sponsor will provide schools with a preliminary report before ratings are published so as to give schools time to respond.

To ensure execution of the aforementioned framework and compliance with Ohio Revised Code 33314.023, sponsored schools must agree to participate in a monthly review process to measure and review the financial and enrollment records. CMSD will work to encourage a culture of learning and sharing of best practices to help ensure that all sponsored schools are supported to meet the financial goals outlined in the framework.

CMSD will conduct monthly, quarterly and annual reviews to assess different components of a school's financial wellbeing as detailed below. Should there be any areas of concern, CMSD may request additional information from the schools to demonstrate both short and long-term financial viability.

Monthly

Goal

Review how schools are managing their resources to ensure sufficient liquidity.

Documents to review

- Balance Sheet
- Statement of Activities
- Enrollment

Review focuses on three metrics

- Days cash on hand
- Current ratio
- Actual enrollment as compared to budgeted enrollment

Monthly reports

The monthly reports will not be scored. They will consist of topics discussed and high level findings. However, should there be a concern related to these metrics or other aspects of the school's financial management, we will note this in the monthly report and may ask for additional information.

Monthly Measures

Measure	Metric	Area of Concern
Days Cash on Hand	Total cash divided by (total budgeted expenditures - depreciation)/365	Less than 20 days
Current Ratio	Current assets divided by current liabilities	Less than 1.0
Enrollment	Actual FTEs divided by budgeted FTEs	Below 90%

Quarterly

Goal

Review how schools are progressing during the school year against their budget and financial goals and provide schools with targeted feedback.

Documents to review

- All monthly documents
- Quarterly surplus/(deficit)
- Quarterly budget to actual

Review focuses on the monthly metrics as well as the following

- Change in net assets
- Budgeted revenue and expenses as compared to actual revenues and expenses

Quarterly report

The quarterly report will be more comprehensive than the monthly report. It will note areas of financial strength and weakness and will highlight any areas of concern. These reports will include calculations for the metrics and will discuss their implications however, they will not include a score.

As with the monthly report, if there are areas of financial concern raised by the quarterly review, we will note this in the report and may ask for additional information.

Quarterly Measures

Measure	Metric	Area of Concern
Days Cash on Hand	Total cash divided by (total budgeted expenditures - depreciation)/365	Less than 20 days
Current Ratio	Current assets divided by current liabilities	Less than 1.0
Enrollment	Actual FTEs divided by budgeted FTEs	Below 90%
Surplus/(Deficit)	Change in net assets	Unplanned decrease in net assets
Budget Variance	Budgeted revenues and expenses compared to actual revenues and expenses	More than 10% negative variance on major budget lines

Annually

Goal

- Provide a comprehensive review of the prior year's financial management to provide schools with useful feedback as they progress through the current school year.
- Ohio sponsors are required by law to monitor and evaluate the academic and fiscal performance, along with the organizational, operational and legal compliance, of each school they sponsor and submit a written report of the evaluation results to the parents of students enrolled in the community school and the Ohio Department of Education by Nov. 30 each year. CMSD presents the reports to each governing board at a governing board meeting, requires schools to post the report on their websites, and also posts the report on the CMSD website.

Documents to review

The year-end review will be scored and will analyze the monthly and quarterly materials and will require the following additional documents:

- Financial statements (balance sheet and income statement) for the entire prior school year as they will be presented to the auditor including all year-end accrual entries
- Final budget to actual reports with explanations for any major variances
- Any written documents that schools wish us to consider

The annual review will focus on the following measures

- Days cash on hand
- Current ratio
- Average annual enrollment as compared to the budgeted enrollment
- Annual surplus/(deficit)
- Annual change in cash position
- Assessment of net assets (excluding the entries made for government pensions)

- Annual budget variance
- Written statement from the school that either states that the school has no debt or that the school has debt. If the school has debt the written statements should identify whether or not the school has made all loan payments on time, whether or not the school has met all required covenants associated with the debt, and whether or not the debt is in default.

Annual year-end report

The annual report will be in the form of a scorecard and will note any explanations and/or materials provided by the school. There will also be a brief narrative which explains the scoring and describes the school's financial position at year-end.

Annual Measures

Measure	Metric	Meets Standard	Area of Concern	Below Standard
Days Cash on Hand	Total cash divided by (total budgeted expenditures - depreciation)/365	30 days	20-30 days	Below 20 days
Current Ratio	Current assets divided by current liabilities	1.1 or higher	1.0 to 1.1	Below 1.0
Enrollment	Actual FTEs divided by budgeted FTEs	95% or higher	90% to 95%	90% or lower
Surplus/(Deficit)	Change in net assets	Increase in net assets	Planned decrease in net assets (per budget)	Unplanned decrease in net assets
Budget Variance	Budgeted revenues and expenses compared to actual revenues and expenses	No more than 10% negative variance on major budget lines		More than 10% negative variance on major budget lines
Increase/(Decrease) in Cash	Change in cash position as compared to prior year	Positive cash flow	Planned decrease in cash (per budget)	Unplanned decrease in cash position
Debt to Assets Ratio	Total liabilities divided by total revenue	0.90 or lower	0.90 to 0.99	1.00 or higher
Debt Covenants	Met covenants	Met covenants		Did not meet covenants
Debt Payments	Timeliness of debt payments	No late debt payments		Late debt payments
Debt Default	Loan default	No default		Loan in default

Additional Reviews

In addition to the monthly, quarterly and annual reports, we will review and report on the following:

- Annual audit which will utilize the same metrics as the year-end annual reviews
- Annual five-year forecasts submitted in May for the upcoming years. We will focus on whether or not the school used realistic assumptions and will assess the school's projected year-end financial positions for each year
- Annual budgets submitted in October for the current year which will focus on whether or not the school used realistic assumptions and will assess the school's projected year-end financial positions.

These additional reviews will be incorporated into the monthly or quarterly reports.

Part 3: Organizational Performance Framework

Overview

The purpose of the organizational performance framework is to establish and communicate the compliance-related standards by which CMSD will monitor and evaluate its sponsored schools. The items included in the framework come from Ohio Department of Education requirements, contract requirements, and state law. When a number is listed in the Item column, it refers to the number from ODE's School Compliance worksheet, available online and updated annually. CMSD staff consulted with all of its sponsored schools to prioritize and organize these items. Items are weighted according to their importance and are organized into nine categories: Access and Student Rights, Health and Safety, Human Capital, Governance, Admissions, Educational Program, Fiscal, Site Visit, and Other.

CMSD aims to maximize school operational autonomy by articulating the base set of state and federal laws, rules, regulations, and contractual obligations that apply to its sponsored schools.

CMSD will primarily use Epicenter to track compliance. Items not submitted by Epicenter deadlines will result in lost points for those items. Policies/compliance items will be reviewed on due dates.

Some compliance-related requirements cannot be assessed via Epicenter. CMSD will also conduct fall and spring site visits, as required by law. CMSD will provide schools with advance notice of site visits. Please review the CMSD Comprehensive Site Visits: Purpose and Protocol document for detailed information on site visits. The bulk of Epicenter due dates are aligned with the fall and spring site visits. For example, CMSD will review all special education policies in the fall and all admission policies in the spring.

Scoring

100 points possible

Exceeds Expectations: 90 to 100 points

Meets Expectations: 80 to 89 points

Does Not Meet Expectations: Below 80 points

Category 1: Access & Student Rights, 18

Category 2: Health & Safety, 14

Category 3: Human Capital, 12

Category 4: Governance, 14

Category 5: Admissions, Enrollment, and Attendance, 8

Category 6: Education Program, 10

Category 7: Fiscal, 7

Category 8: Site Visit, 8

Category 9: Other, 9

1. Access & Student Rights (18 points possible)

1A) Subcategory: Special Education (13)

Item	Description	Points possible
171, 172, 174, 175, 176, 178	Written policies for special education as required by Ohio Revised Code: <ul style="list-style-type: none"> • Provision of services (171) • IEP development and implementation (172) • Confidentiality (174) • Identification and evaluation of homeless students with disabilities (175) • Free appropriate public education (176) • Ensuring compliance with IDEIA (178) 	6
172	IEPs implemented as written	2
173	Standards/procedures for identification and evaluation of students with disabilities consistent with federal and state law	2
177	Services delivered in the least restrictive environment while also allowing for a continuum of services	2
182	School submitted plan to ODE for serving students with disabilities	1

1B) Subcategory: Student Rights (3)

Item	Description	Points possible
405 and 406	Does school provide due process for students suspended, expelled, removed AND does the school follow the policy?	2
901	School has adopted policy on Positive Behavioral Intervention and Supports that complies with Ohio requirements	1

1C) Subcategory: Access

Item	Description	Points possible
432	School will achieve racial and ethnic balance reflective of community it serves	2

2. Health & Safety (14 points possible)

2A) Subcategory: Food safety (3)

Item	Description	Points possible
705	The school adopts a policy to protect students with peanut or other food allergies.	1
778	School should ensure that at least one employee is present during food service who is trained in the Heimlich maneuver.	2

2B) Subcategory: Facilities (5)

Item	Description	Points possible
752	The school does not apply lead-based paint and complies with all orders and requirements for inspection, maintenance, and prevention of lead-based poisoning.	2
759	The school timely submitted an emergency management plan in the form required by the Department and the plan was approved.	1
	Did the school do all of their required rapid safety and dismissal drills? Including tornado drills in appropriate months and a drill within first 10 days of school.	2

2C) Subcategory: Student wellness (6)

Item	Description	Points possible
703	The school screened pupils enrolled in either kindergarten or first grade prior to Nov. 1 for hearing, vision, speech and communications, or medical problems and developmental disorders AND notified parents of the screening before August 1.	2
706	The school has adopted policies and procedures regarding child abuse reporting and training of all staff and volunteers as to their obligation to report and consequences for failure to do so. Requires policy and training records.	2
755	The school board reviewed policies and procedures to ensure safety of students, employees and other persons using a school building from any known hazards in the building or on building grounds that pose an immediate risk to health or safety.	1
761	School adopted required policy prohibiting harassment, intimidation and bullying.	1

3. Human Capital (12 points possible)

3A) Subcategory: Licensure/Professional

Item	Description	Points possible
118	The school sees that students on reading monitoring improvement plans (applies to grades 3 and 4 only) are taught by teachers with the appropriate license, endorsements, and/or qualifications.	1
603	The school will suspend a person from all duties that require the care, custody, or control of a child during the pendency of the criminal action against the person-applicable when an employee was subject to criminal action.	1

611	The school has a local professional development committee to determine coursework and other professional development needed by licensed educators to satisfy the renewal of such licenses.	1
607 and 612	All school teachers, aides, and providers are properly licensed by the State Board of Education.	2
Teacher retention		2

3B) Subcategory: Background checks

Item	Description	Points possible
622, 623, 624, 625, 626	The school has done all required criminal background checks	5

4. Governance (14 points possible)

Item	Description	Points possible
665	The school shall post on the school's website the names of the school's governing authority and provides, upon request, the name and address of each member of the governing authority to the sponsor of the school and the Ohio Department of Education	1
664	The school's meetings of its governing authority are public meetings, provide public advance notice, and follow all laws with respect to proper public meeting protocol.	3
667	The school's governing authority members, fiscal officer, administrators and supervisory staff are annually trained on the public records and open meetings laws.	1
316/668	Public and student records. The school fills public records requests timely and at least one person, as designated by the school, has attended training approved by the attorney general about the school's obligations pertaining to public records	3
658	Ethics. Governing authority members have no interest in public contract, etc.	1
659	No member of governing authority also on district board	1
661	Independent counsel used when required	1
662	Comprehensive Plan	3

5. Admissions, Enrollment, and Attendance (8 points possible)

Item	Description	Points possible
401	The school provides parents with the proper notice of truancy, utilizes an intervention strategy and/or files a complaint in juvenile court when appropriate for students that are truant. The board is to adopt policy regarding habitual truancy and intervention strategies.	2
426	The school has an admission procedures that specify the items outlined in ORC 3314.06	2
427	Does the school have an admission policy that addresses students residing outside the district of residence? Yes/No	1
429	The sponsor monitors the school to confirm the school's complete and accurate reporting of student enrollment data used to calculate payments, and reviews the school's borrowing and expenditures for consistency with legal requirements	1
436	The School provides parents or guardians with a copy of the most recent report card during the admissions process.	1
Lottery		1

6. Education Program (10 points possible)

Item	Description	Points possible
101	The sponsor confirms annually that the school provides at least 920 hours of learning opportunities to at least 25 students.	1
105	The school has adopted a policy, updated annually, governing academic prevention and intervention services covering requirements of law, which include but are not limited to measuring student progress, identifying students not attaining proficiency thresholds, collect and using student performance data, and provision of prevention/intervention services.	1

107	The school implements interventions outlined by Ohio's "No Child Left Behind Act of 2001"	1
116	The School promotes students to fourth grade when all criteria outlined in ORC 3313.608 are met.	1
117	The school continues any required intervention services for students not promoted to 4th grade, consistent with the requirements of 3313.608.	1
217	School provides intervention services to students not meeting certain proficiency level	2
220	The school administers state diagnostic tests to students in required categories and to all students in the appropriate grade level at least once annually, providing the information to parents and the Department.	1
309	The School administers all required assessments and submits all data required to calculate the report card to the Department.	1
902	The School adopted a grade promotion and retention policy that prohibits the promotion of a student to the next grade level if the student has been truant for more than 10% of the required attendance days of the current school year and failed two or more of the required curriculum subject areas, unless the student's principal and teachers of any failed subject areas agree the student is academically prepared for the next grade level.	1

7. Fiscal (7 points possible)

Item	Description	Points possible
308	The school follows all guidelines and timely submitted complete and accurate EMIS data, using a software package certified by the Department. Each fiscal officer appointed under section 3314.011 of the Revised Code is responsible for annually reporting the community school's data under section 3301.0714 of the Revised Code.	1
502	Schools that receive funding under Title I must maintain the required level of expenditures on an annual basis as outlined in federal regulation	1

503	The school reports all financial information in an easily understood format and by the reporting categories and subgroups required by the Department.	1
504	Annually, the school provides a financial plan detailing an estimated budget and the per pupil expenditures.	1
506	The Schools filed annual financial reports with the Auditor of State that are prepared using generally accepted accounting principles.	1
509	The school has liability insurance sufficient to cover any risks to the school.	1
Audit	Audit devoid of significant findings and conditions, material weaknesses or significant internal control weaknesses; no ongoing concerns	1

8. Site Visit (8 points possible)

Item	Description	Points possible
Fall Site Visit	Please see CMSD's Comprehensive Site Visit protocol, available at http://www.clevelandmetroschools.org/Page/6133	4
Spring Site Visit	Please see CMSD's Comprehensive Site Visit protocol, available at http://www.clevelandmetroschools.org/Page/6133	4

9. Other (9 points possible)

Item	Description	Points possible
Other ODE requirements	Please see ODE's School Compliance worksheet, available online at http://education.ohio.gov/Topics/Community-Schools and updated annually.	5
CAPs	This refers to Corrective Action Plans.	2
Intervention Protocol	CMSD's intervention protocol appears at the end of this Attachment.	2

Part 4. INTERVENTION PROTOCOL

INTRODUCTION

This Intervention Policy, with the accompanying Table of Interventions, describes the general conditions that may trigger intervention in a community school sponsored by the Cleveland Municipal School District (CMSD) where warranted or required by law or contract, and it explains the types of consequences and actions that may ensue.

This Intervention Policy is designed to support CMSD's execution of community school monitoring and oversight responsibilities as set forth in Ohio law and regulation, including the Ohio Department of Education's (ODE's) standards and expectations for Sponsor Quality Practices.¹ These sponsorship responsibilities include implementing, where warranted and in accordance with state law and contract, a range of intervention possibilities including probationary status, suspension of school operation, and community school contract termination.

The Intervention Policy preserves school autonomy and school responsibility for developing and executing remedies to identified deficiencies or violations. In carrying out the Intervention Policy, CMSD will provide notice and adequate time and opportunity for schools to address deficiencies in non-emergency situations.

The following Table of Interventions outlines a tiered intervention process that applies increasing consequences for schools until deficiencies are either sufficiently resolved or, if necessary, ultimately results in termination of the community school contract.

Note: While the Table of Interventions outlines a tiered range of intervention options, it does not represent a mandatory linear escalation of steps and consequences, in which a school must proceed through every step or level. In any particular school's case, CMSD may skip a level of intervention, as may be necessary or required by law, and in accordance with law. For example, a school might move from Level 3, Probationary Status directly to Level 5, Termination Review if warranted by circumstances.

To preserve community school autonomy, it is the responsibility of any school placed in intervention to develop and execute its own remedies, remedial action plan, or corrective action plan. The process for corrective action will follow ODE's guidance to sponsors related to oversight of compliance with reporting requirements.¹ It is CMSD's responsibility to approve and monitor plans to ensure concerns are addressed. If a school remedies conditions to the satisfaction of the sponsor, it will be removed from intervention.

¹ ORC 3314.023, <http://codes.ohio.gov/orc/3314.023> outlines monitoring and oversight of charter schools; ORC 3314.015 <http://codes.ohio.gov/orc/3314.015> outlines ODE oversight of sponsors, and <https://education.ohio.gov/Topics/Community-Schools/Sponsor-Ratings-and-Tools/2016-2017-Sponsor-Evaluations-Tools> provides guidance from ODE on how sponsors are evaluated for monitoring community schools' compliance with reporting requirements.

COMMUNITY SCHOOL TABLE OF INTERVENTIONS

Range of Interventions		
Status	Conditions that may trigger status	Consequences
Level 1: Notice of Concern	<p>Indications of weak or declining performance identified through routine monitoring, site visits, or other means;</p> <p>Repeated failure to meet or submit requirements on a timely basis, which may include being placed on a corrective action plan for noncompliance.</p>	<p>Written notice to school governing authority detailing severity of concern, CMSD’s requirements for resolution, timeline, and consequences if not satisfactorily remedied;</p> <p>Corrective action plan developed by the school and approved by CMSD, as necessary, and aligned with ODE guidance.²</p>
Level 2: Notice of Breach	<p>Failure to satisfactorily remedy or make substantial progress toward remedying previously identified concern(s);</p> <p>Failure to meet multiple performance targets;</p> <p>One or more indicator-level “Falls Far Below” ratings on any Performance Framework;</p> <p>Failure to comply with applicable law, or breach of contract.</p>	<p>Written notice to governing authority detailing severity of concern, CMSD’s requirements for resolution, timeline, and consequences if not satisfactorily remedied;</p> <p>Specialized site visit, if necessary;</p> <p>Meeting with governing authority, as necessary;</p> <p>Remedial action plan developed by the school and approved by CMSD, as necessary.</p>
Level 3: Notice of Probationary Status³	<p>More than two “Falls Far Below” ratings on any Performance Framework;</p> <p>Continued failure to comply with applicable law or with the community school contract;</p>	<p>Remedial action plan developed by the school and approved by CMSD;</p> <p>Meeting with governing authority;</p> <p>Specialized site visit, if necessary;</p>

² More information on corrective action plans, per ODE guidance to sponsors on monitoring reporting requirements, is available in the Sponsor Evaluation Technical Document, pp. 11-12:

<https://education.ohio.gov/getattachment/Topics/Community-Schools/Sponsor-Ratings-and-Tools/2016-2017-Sponsor-Evaluations-Tools/Sponsor-Evaluation-Technical-Document.pdf.aspx>

³ CMSD’s policy and practices regarding probationary status will follow Ohio statutory requirements including ORC 3314.073, <http://codes.ohio.gov/orc/3314.073>.

Range of Interventions		
Status	Conditions that may trigger status	Consequences
	Failure to meet or make sufficient progress toward meeting terms of the remedial action plan, as relevant.	If needed, CMSD may appoint an agent to monitor implementation of remedial action plan.
Level 4: Suspension of Operation of School⁴	Continued failure to comply with applicable law or with the community school contract; Failure to meet or make sufficient progress toward meeting terms of the remedial action plan, as relevant; Noncompliance with an applicable health or safety standard (<i>requires immediate suspension</i>).	Written notice stating intent to suspend school operation, or (if applicable and as required by law) written notice of <i>immediate suspension</i> of school operation, including reason(s) for suspension; Meeting with governing authority; Remedial action plan developed by the school and approved by CMSD; If needed, CMSD may appoint an agent to monitor implementation of remedial action plan.
Level 5: Termination Review	Extended pattern of failure to comply or to meet performance targets; Failure to satisfactorily address or make sufficient progress toward meeting terms of probation; Failure to remedy reason(s) for suspension of school operation; Applicable conditions for termination set forth in charter school law. ⁵	<i>Termination review process will be conducted in accordance with state law and will include:</i> Written notice from CMSD stating reason(s) for proposed termination; Specialized site visit, if necessary; Opportunity for an informal hearing; CMSD decision to terminate or not terminate.

⁴ CMSD’s policy and practices regarding suspension of the operation of a community school will follow Ohio statutory requirements including ORC 3314.072, <http://codes.ohio.gov/orc/3314.072>.

⁵ CMSD’s policy and practices regarding termination of a community school will follow Ohio statutory requirements including ORC 3314.07, <http://codes.ohio.gov/orc/3314.07v1>.