INTERVENTION POLICY

Pursuant to Ohio law, the Board of Governors may intervene in a Sponsored School's operation for certain reasons. Intervention includes, but is not limited to, putting the School on a corrective action plan, placing the School in probationary status, suspending or assuming the School's operations, non-renewing the School's Sponsor Contract, or terminating the Sponsor Contract.

Mid-Ohio ESC seeks to avoid unnecessary intervention. Mid-Ohio ESC recognizes that certain "non-material" conditions or violations do not warrant formal intervention. Such "non-material" conditions or violations should be resolved through open dialogue with the School or through a corrective action plan.

When conditions warrant formal intervention, Mid-Ohio ESC endeavors to enforce the least invasive intervention through its "Step" procedures described below. The Steps are designed to ensure the School's autonomy and to allow the School to self-correct deficiencies, when appropriate.

Conditions that may Trigger Intervention and Corrective Action

Conditions that may trigger Mid-Ohio ESC intervention and corrective action include, but are not limited to, the following:

- Violation of the material terms of the Sponsor Contract
- Violation of federal, state, or local laws
- Weak or declining academic performance
- Failure to meet academic performance expectations
- Failure to meet indicators of financial viability or sustainability
- Deviation from the education, management, administration, or financial plan(s)
- Threats to the health, safety, or welfare of students
- Failure to meet standards for fiscal management
- Failure to attend to or correct audit findings or material weaknesses
- Failure to meet state reporting deadlines
- Inaccurate reporting to the state that is material or cannot be corrected
- Mismanagement of public funds
- Financial malfeasance
- Failure to retain sufficient enrollment to remain financially viable
- Failure to retain adequate and safe facilities
- Substantiated complaints against the School
- Substantiated ethics or conflicts violations
- Failure of the Governing Authority to comply with applicable laws, rules, regulations, or provisions of the Sponsor Contract related to governance

- Failure of Governing Authority to meet pursuant to the Sponsor Contract and Sunshine Laws
- Failure to report conditions that may have a material impact on the School

To minimize occurrences of intervention, Mid-Ohio ESC has established a documented, systematic, and proactive sponsorship program. Mid-Ohio ESC believes that most formal interventions can be avoided through this program.

Mid-Ohio ESC may identify conditions that may trigger intervention through providing technical assistance; conducting site visits, reviews, and reports; conducting monthly academic, financial and enrollment reviews; annual reviews; providing performance report; a needs assessment; attending Governing Authority meetings; and engaging in regular communication with the School.

Investigation of Condition

Prior to initiating a formal intervention, Mid-Ohio ESC shall investigate the conditions that may trigger formal intervention. The Superintendent shall adopt a process for investigating conditions. Steps shall include evaluating the identified condition, if applicable, verifying the condition, and communicating about the condition with the School, if reasonable. The investigation process will be documented.

Steps and Intervention Action

The following guidelines shall be applied on a step-by-step basis, except for situations where the severity of the offense, violation, or failure warrants initiating intervention at a more advanced Step. When practicable, Mid-Ohio ESC shall allow the School to establish a method for resolving the issue to maintain school autonomy.

Status	Conditions that may trigger Status	Consequences
Step 1: Notice of Concern	Weak or declining performances. Issues identified in site visits. Conditions identified above. The School does not meet standards on performance measures.	Notification to the School's Superintendent. School proposes method for Resolution. Mid-Ohio ESC creates a timeline for improvement.
Step 2: Notice of Breach	Unresolved Step 1 issues. Conditions identified above.	Written notification to the Governing Authority and the School's Superintendent. School proposes method for corrective action and resolution. Mid-Ohio ESC creates a timeline for improvement. Additional site visits to affirm correction of problem, if necessary.

Step 3: Probationary Status	Unresolved Step 1 or 2 issues. Conditions identified above. Grounds specified in O.R.C. 3314.07.	Mid-Ohio ESC places School on probationary status pursuant to O.R.C. 3314.073, monitors progress and corrections.
Step 4: Suspending Operation or Assuming Operation	Unresolved Step 1, 2, or 3 issues. Conditions identified above. Grounds specified in O.R.C. 3314.07. Review of plan to address pursuant to intent to suspend due process procedures, deficiencies, timeframes, benchmarks and decision as to whether to suspend.	Mid-Ohio ESC suspends operation of the School pursuant to due process procedures in O.R.C. 3314.072.
Step 5: Termination	Unresolved step 1, 2, 3 or 4 issues. Conditions identified above Grounds specified in O.R.C. 3314.07.	Mid-Ohio ESC terminates the Sponsor Contract pursuant to O.R.C. 3314.07 or lets the deadline date of September 30 pass so contract automatically terminates.

Timeframes for Monitoring and Measuring Progress and Deadlines for Resolving the Deficiency

When implementing formal intervention, Mid-Ohio ESC shall establish reasonable timeframes for achieving progress and deadlines for resolving the deficiency, as it deems appropriate. Mid-Ohio ESC recognizes that timeframes and deadlines will vary depending on the condition and that no policy can foresee nor predict a reasonable timeframe for making progress or resolving certain types of deficiencies. Mid-Ohio ESC shall request and review status updates from the School regarding its progress in resolving or not resolving the deficiency and document progress or lack thereof.

Consequences for Not Resolving the Deficiency

Consistent with the intervention table described above, the School's failure to resolve a deficiency may result in subsequent step on the table.

Probation

In lieu of termination of the Sponsor Contract or suspension of the operation of the School, after consultation with the Governing Authority, if Mid-Ohio ESC finds that any of the conditions prescribed in division (B)(1) of section 3314.07 of the Revised Code apply to the School, Mid-Ohio ESC may declare in written notice to the Governing Authority that the School is in a

probationary status which shall not extend beyond the end of the current school year. The notice shall specify the conditions that warrant probationary status. Mid-Ohio ESC may declare the School to be in such status only if it has received from the Governing Authority reasonable assurances to Mid-Ohio ESC's satisfaction that the Governing Authority can and will take actions necessary to remedy the conditions that have warranted such probationary status. Mid-Ohio ESC shall monitor the actions taken by the Governing Authority to remedy the conditions that have warranted probationary status. Mid-Ohio ESC may take over the operation of the School as provided in the Sponsor Contract, may take steps to terminate the Sponsor Contract, or may take steps to suspend the operation of the School, if Mid-Ohio ESC at any time finds that the Governing Authority is no longer able or willing to remedy those conditions to Mid-Ohio ESC's satisfaction.

Suspension

Mid-Ohio ESC may suspend the operation of the School only if it first issues to the Governing Authority notice of the Mid-Ohio ESC's intent to suspend the operation of the Sponsor Contract. Such notice shall explain the reasons for the Mid-Ohio ESC's intent to suspend operation of the Sponsor Contract and shall provide the School's Governing Authority with five (5) business days to submit to Mid-Ohio ESC a proposal to remedy the conditions cited.

Mid-Ohio ESC shall promptly review any proposed remedy timely submitted by the Governing Authority and shall either approve or disapprove the proposed remedy. If Mid-Ohio ESC disapproves the proposed remedy, the Governing Authority fails to submit a proposed remedy in the manner prescribed by Mid-Ohio ESC, or if the Governing Authority fails to implement the remedy as approved by Mid-Ohio ESC, Mid-Ohio ESC may proceed with suspension as set forth below.

If Mid-Ohio ESC decides to suspend the operation of the School, Mid-Ohio ESC shall promptly send written notice to the Governing Authority stating that the operation of the School is immediately suspended. The written notice shall contain specific reasons for the suspension and shall state that the Governing Authority has five (5) business days to submit a proposed remedy to the conditions cited as reasons for the suspension or face potential Sponsor Contract termination. Upon receipt of the notice of suspension, the Governing Authority shall immediately notify the employees of the School and the parents of the students enrolled in the School of the suspension and its reasons and shall cease all school operations on the next business day.

If Mid-Ohio ESC suspends the operation of the School, the Sponsor Contract entered into under section 3314.03 of the Revised Code shall become void, by the thirtieth day of September of the school year immediately following the school year in which the operation of the School was suspended, unless the Governing Authority provides a proposal to remedy the conditions cited by Mid-Ohio ESC as reasons for the suspension, to the Mid-Ohio ESC's satisfaction, by the thirtieth day of September of the school year immediately following the school year in which the operation of the School was suspended.

Termination

Please refer to the Mid-Ohio ESC Termination Policy.

LEGAL REF: O.R.C. §§3314.07, 3314.072, 3314.073, and 3314.351
Quality Practices Rubric: D.06 – Intervention

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