

Monitoring Corrective Action Plan and Progressive Sanctions Policy for School Improvement Grants

OFFICE OF SCHOOL AND DISTRICT IMPROVEMENT

STATEMENT OF PURPOSE

The Office of School and District Improvement (OSDI) is responsible for ensuring the State Education Agency (SEA) (Ohio Department of Education and Workforce) and the local educational agencies (hereinafter referred to as “districts and/or grantees”) are in compliance with all the requirements of the Elementary and Secondary Education Act (ESEA) as reauthorized by the Every Student Succeeds Act (ESSA) programs. OSDI is customer-focused and provides an array of technical assistance and programmatic support to identified schools (and their associated districts) and grantees to ensure proper implementation of the ESEA requirements. OSDI conducts monitoring and oversight activities, and as needed, utilizes a system of progressive sanctions for non-compliant grantees to ensure adherence with federal requirements.

FIVE-STEP COMPLIANCE AND PROGRESSIVE SANCTIONS PROCESS

Generally, OSDI will follow a five-step compliance and progressive sanctions process. However, depending on the severity of the non-compliance, the action may warrant special attention and acceleration through the five-step process.

A description of each step is below:

STEP 1: TECHNICAL ASSISTANCE

Technical assistance occurs following the review of the grant monitoring survey when documentation is missing or the documentation provided is inadequate. In the Monitoring application, the question will be marked as “Technical Assist”.

1. OSDI will request additional information from grantees regarding program requirements with specified deadlines for submission.
2. OSDI and the grantees may meet (virtually or in person) to discuss needs for additional documentation and an adjusted deadline may be agreed upon to provide the updated documentation.

STEP 2: CORRECTIVE ACTION PLAN

A corrective action plan (CAP) occurs when a grantee fails to provide the requested documentation by the agreed upon deadline. In these cases, OSDI may publish an “Issue” in the monitoring system to alert grantees.

Grantees will receive a monitoring system-generated report of issues or findings which may require a corrective action plan (CAP) to be completed by a specific date.

1. The corrective action plan will require grantees to submit a written plan detailing how they will rectify the issue, improve internal processes moving forward and assure that all future fiscal or programmatic reviews will meet the new requirements.
2. OSDI will ensure grantees submit the CAP requested by the deadlines and monitor the progress of each district/grantee's CAP.

STEP 3: LETTER #1 FOR FAILURE TO ADDRESS CORRECTIVE ACTION PLAN (CAP)

1. The grantee will receive a letter notifying them of failure to provide requested information or failure to meet the CAP requirements or timelines.
2. The letter will provide a timeline to address the original request or CAP requirements and provide a list of possible sanctions for failure to meet the new timeline. A written response is required from the grantee's superintendent and/or treasurer to address the informational request or the CAP requirements.

STEP 4: LETTER #2 TO INITIATE SANCTIONS AND AFFORD HEARING OPPORTUNITY

1. The grantee will receive a letter notifying them of failure to meet requirements in Letter #1 and sanctions implemented as a result.
2. The letter will identify and provide the grantee with the sanction(s) the Department will implement.
3. In addition, the letter will notify the grantee of the opportunity to request a hearing.

STEP 5: HEARING

1. The Department will hold a hearing, in accordance with the processes specified by OSDI, if such a hearing is requested by the grantee.

STATE ENFORCEMENT AUTHORITY FOR PROGRESSIVE SANCTIONS

1. ESEA Section 9304 (3): The State will adopt and use proper methods of administering each such program, including—(A) the enforcement of any obligations imposed by law on agencies, institutions, organizations, and other recipients responsible for carrying out each program
2. Code of Federal Regulations (CFR): Uniform Guidance (2 CFR Part 200.338) <http://www2.ed.gov/policy/fund/guid/uniform-guidance/index.html>
3. 34 CFR EDGAR Part 76 (State Administered Programs): Sections 76.770 and 76.783