

Oxford Preparatory Academy Governance and Administration Recovery Plan

The Oxford Prep Board of Directors and administrative team acknowledge the findings of the November 2016 FCMAT report and subsequent conversations with our authorizers and auditor. We take these violations seriously and have developed and implemented a comprehensive corrective action plan to address the violations and to ensure they never occur again. There is no doubt we have experienced obstacles as we work to re-shape the culture and practices created by our founder and former leader. We do not want to make excuses for past mistakes. Rather, we have thoughtfully and intentionally listened to the feedback from all of our authorizers, parents, and community members, as well as carefully considering the FCMAT report.

The Board, administration, staff, and parent community of Oxford Prep is fully committed to:

1. restoring integrity and trust throughout the Oxford organization;
2. operating in compliance with District policy and state law;
3. placing controls to insure that irregularities never occur again;
4. cooperating with efforts to hold those involved in any misconduct responsible; and
5. demonstrating and exercising the fiduciary responsibilities of the Oxford Prep Board of Directors over the management and operation of the schools.

Oxford Prep is hopeful that all stakeholders will recognize that our school has made significant changes in the makeup of its board and executive administration. We have welcomed an entirely new Board, an entirely new organizational leadership team, and an entirely new business office team. With these changes of leadership, we are actively pursuing efforts to right the course of the school. We have a new financial services provider (Charter Impact), and we have revised numerous policies and procedures.

We are fortunate to have a vast group of dedicated, talented and passionate parents, supporters and teachers, who have been extremely active in rebuilding and changing the culture at Oxford Prep. Our charter petition, governance structure, and most importantly our successful educational program have remained the same. We have solid plans for Oxford Preparatory Academy's future, and we ask all parties to review these improvements and future plans as you consider the steps our organization is taking to demonstrate that it can achieve excellence in both governance and education.

The new Oxford Prep Board and Administration wishes to outline the actions taken to date to address the circumstances that led to the FCMAT findings and to respond fully to all concerns.

FCMAT Finding/Violation	Corrective Actions
<p>1. Lack of Internal Controls Led to Possible Fraud</p>	<ul style="list-style-type: none"> ● Require two signatures for approval of any expense over \$10,000. (12/6/16) ● Updated Business Expense Reimbursement Policy (Staff & Board). (12/6/16) ● Back office provider, Charter Impact, hired to oversee financial services. (Board approved 12/13/16, Starting date 1/3/17) ● Entered into an <i>Agreement for Special Services regarding Fiscal Budget Services</i> with School Services of California, upon the recommendation of the FCMAT team. ● Conducted an internal forensic review of all financials dating back to 2012. ● Requested that Oxford Prep’s auditor reissue annual audits. ● Will contract with a third party to implement all employee and Board members training on suspected fraud or abuse. ● Will implement conflict of interest and ethics training for all employees, including managers and Board members.
<p>2. Conflict of Interest</p>	<ul style="list-style-type: none"> ● Severed ties with Oxford Prep’s founder/former Executive Director. (5/26/16) ● Severed ties with former charter management organization and any Roche-associated enterprises. (5/26/16) ● Updated Anti-Discrimination, Unlawful Harassment, and Unlawful Retaliation policy. (12/6/16) ● Updated Uniform Complaint Procedures. (12/6/16) ● Started process for approving Amended Conflict of Interest Code. (1/3/17) ● Reviewing all agreements with contractors to determine if there are self-dealing or other inappropriate relationships between vendors and OPA .
<p>3. Failure to Disclose Related-Party Affiliates and Transactions</p>	<ul style="list-style-type: none"> ● Requested that Oxford Prep’s auditor reissue annual audits due to hidden affiliated and/or related party organizations ● The charter for The Academies of Oxford Prep (TAOP) expired June 30, 2016. Former Oxford Prep employees Sue Roche and Barbara Black, at one time leased to TAOP, are no longer employed by Oxford Prep.

4. Gift of Public Funds and Loans	<ul style="list-style-type: none"> Engaged the Theodora Oringer law firm to assess next steps for the recovery of any funds that were inappropriately paid to Edlighten (2/7/17).
5. Diversion of Funds	<ul style="list-style-type: none"> Engaged the Theodora Oringer law firm to assess next steps for the recovery of any funds that were inappropriately paid to Edlighten (2/7/17). Requested that Oxford Prep's auditor reissue annual audits due to hidden affiliated and/or related party organizations.
6. Improper Use of Public Funds on Personal Expenditures	<ul style="list-style-type: none"> Eliminating practice of using SCRIP for any organizational use. Received initial reimbursement from Sue Roche and are in active mediation to determine future reimbursements.
7. Failure to Respond to All Inquiries Regarding Financial Records	<ul style="list-style-type: none"> The new Board and executive administration is committed to complying with any and all requests for information.

VLS Audit Targets	Corrective Actions
1. Board of Directors	<ul style="list-style-type: none"> Replaced the entire Board of Directors with unbiased, independent individuals who do not have a history or relationship with previous or current employees.
2. Executive Director	<ul style="list-style-type: none"> Replaced the Executive Director with Denise Pascoe as Interim Executive Director, an individual with no ties to the founder. The final selection of Executive Director will also have no ties to the founder. (12/6/16)
3. Audit Committee	<ul style="list-style-type: none"> Will form an Audit Committee to oversee the annual and special audits during the 2016-17 year and thereafter.
4. Nepotism Policy	<ul style="list-style-type: none"> Approved a new Nepotism Disclosure Policy to ensure any employee or vendor relationships defined as 'nepotism' is disclosed to the Board prior to entering into a contract or employment. (1/3/17)
5. Conflict of Interest Code	<ul style="list-style-type: none"> Started the process for approving an Amended Conflict of Interest Code to ensure active enforcement. (1/3/17)

6. Annual Update	<ul style="list-style-type: none"> ● Will hold all such meetings to comply with VLS' recommendations.
7. Committees/Working Groups	<ul style="list-style-type: none"> ● Will form all committees necessary to fully comply with VLS' recommendations.

Other Issues	Corrective Actions
Board of Directors	<ul style="list-style-type: none"> ● Complete transition of Board Members <ul style="list-style-type: none"> ○ Neveen Adley, Albert Diaz, and Andrew Vestey (all current Oxford Prep parents) elected to Board (10/26/16) ○ Former Board Chairman Michael Delgado resigned (12/5/16) ○ Debra Tarver (charter school leader) elected to Board (12/6/16) ○ Sandra Garner (former teacher and Congressional Chief of Staff) elected to Board (1/3/17)
Executive Administration	<ul style="list-style-type: none"> ● Complete transition of organizational leadership <ul style="list-style-type: none"> ○ Former Executive Director, Barbara Black resigned (12/6/16) ○ New Interim Executive Director Denise Pascoe hired (12/6/16) ○ Key personnel changes per Board approved vacancies (12/11/16) <ul style="list-style-type: none"> ■ Managing Director ■ Chief Operations Officer ■ Chief Academic Officer ○ New Interim Managing Director Andrew Crowe hired (12/15/16)
Business Office	<ul style="list-style-type: none"> ● Complete transition of Business Office <ul style="list-style-type: none"> ○ Coordinator of Business Services position vacated (11/16/16) ○ Coordinator of Administrative Services position vacated (11/16/16) ○ Chief Financial Officer resigned (12/14/16) ○ Contracted out all back-office services to Charter Impact, an independent firm (1/3/17) ○ New Coordinator of Business Services hired (1/9/17)

<p>Transparency</p>	<ul style="list-style-type: none"> ● Board Meeting audio recordings posted online, starting 12/11/16. ● Calendared monthly regular OPA Board Meetings through the end of 2016-17 school year. ● Conducting numerous parent outreach meetings to provide transparency to our families. ● Providing information through multiple traditional and digital media outlets to allow transparency with all stakeholders. ● Opened separate Academy Fund bank accounts for each campus, allowing for site (staff and parents) control and oversight. ● Will develop a Fundraising Policy to ensure that all monies raised are properly tracked and used.
<p>Ongoing Professional Development</p>	<ul style="list-style-type: none"> ● Interim Managing Director attended the California Charter School Association's Finance Academy. ● Interim Executive Director and Coordinator of Business Services are enrolled in the Charter Schools Development Center's 2017 Charter Business Officer Training Program. ● Interim Executive Director, Interim Managing Director and site administrators attended the Charter Schools Development Center's Accountability and LCAP Strategies Workshop on February 17, 2017.
<p>Perceived Barriers for Families</p>	<ul style="list-style-type: none"> ● Applying to become a National School Lunch Program sponsored school. ● Updated Uniform Policy.
<p>Relationship Changes</p>	<ul style="list-style-type: none"> ● Contracted with Christy White Associates to provide auditing and tax services. ● Drafting a Request For Proposal to procure a new insurance broker.