



DALEVILLE COMMUNITY SCHOOLS

CLOSURE PROTOCOL CHRONOLOGICAL VERSION

*For Indiana Virtual School
Authorized by
Daleville Community Schools*

June 19, 2019

Closure Protocol Action Plan

Final year of operations: 2018-19
Official last day of classes: September 10, 2019
Official last day of operations: November 9, 2019

Completion Date	Description of Required Actions	Responsible Party	Status
ONGOING TASKS			
Ongoing until closure is complete	<p>Expenditures over \$25,000 All expenditures, transfers, disbursements in excess of \$25,000.00 must be reported to DCS within three (3) days of the event.</p>	IVS Financial Lead	
Ongoing until closure is complete	<p>Maintenance of Location and Communication Establish if IVS will maintain the current facility for the duration of closing out the IVS's business, regulatory and legal obligations. In the event the facility is sold or otherwise vacated before concluding IVS's affairs, IVS must relocate its business records and remaining assets to a location where a responsive and knowledgeable party is available to assist with closure operations. IVS must maintain operational telephone service with voice message capability, and maintain custody of business records until all business and transactions are completed and legal obligations are satisfied.</p> <p>IVS must immediately inform DCS staff if any change in location or contact information occurs.</p>	IVS Lead	
Ongoing until closure is complete	<p>Insurance In order to protect IVS's assets and any assets in the IVS that belong to others against theft, misappropriation and deterioration, IVS must:</p>	IVS Lead IVS Financial Lead	

	<ol style="list-style-type: none"> 1. Maintain existing insurance coverage on assets, including facility and vehicles, until the disposal of such assets in accordance with the closure plan; 2. Negotiate IVS facility insurance with entities that may take possession of IVS facility – lenders, mortgagors, bond holders, etc.; 3. Obtain or maintain appropriate security services. Action may include moving assets to secure storage after closure or loss of facility. 		
Ongoing until closure is complete	<p>Disposition of Corporate Records</p> <p>The IVS board shall maintain all corporate records related to:</p> <ol style="list-style-type: none"> 1. Loans, bonds, mortgages and other financing; 2. Contracts; 3. Leases; 4. Assets and asset distribution; 5. Grants (records relating to federal grants must be kept in accordance with 34 CFR 80.42); 6. Governance (minutes, bylaws, policies); 7. Employees (background checks, personnel files); 8. Accounting/audit, taxes and tax status, etc.; 9. Employee benefit programs and benefits; and 10. Any other items listed in the closure action plan. <p>The IVS board shall, with final approval reserved by the DCS Staff, determine the location for the permanent storage of records after dissolution.</p>	IVS Lead DCS Lead	
Prior to the completion of closure protocol	<p>Inventory Assets</p> <p>Inventory IVS assets, and identify items:</p> <ol style="list-style-type: none"> 1. Loaned from other entities; 2. Encumbered by the terms of a contingent gift, grant or donation, or a security interest; 	IVS Financial Lead	

	<ol style="list-style-type: none"> 3. Belonging to the EMO/CMO, if applicable, or other contractors; and 4. Purchased with federal grants (dispose of such assets in accordance with federal regulations). <p>Return assets not belonging to IVS where appropriate documentation exists. Keep records of assets returned.</p> <p>Provide DCS lead with a copy of all documents.</p>		
TBD	<p>IRS 501(c)(3) Status</p> <p>If IVS has 501(c)(3) status, it must take steps to maintain that status including, but not limited to, the following:</p> <ol style="list-style-type: none"> 1. Notify IRS regarding any address change of IVS; and 2. File required tax returns and reports. <p>Notify the IRS of dissolution of IVS and its 501(c)(3) status, and provide a copy to the DCS lead.</p>	<p>IVS Lead</p> <p>IVS Financial Lead</p>	
TBD by SBOA	<p>Final Financial Audit</p> <p>Establish a date by which to complete a final close-out audit by an independent firm or state auditor.</p> <p>Provide the DCS lead with a copy of the final audit.</p>	<p>IVS Lead</p> <p>IVS Financial Lead</p>	
JUNE 2019			
6/19/2019	<p>Cease enrolling students</p> <p>Take appropriate action to cease all enrollment activities for new or returning students.</p> <ul style="list-style-type: none"> • No students may be enrolled, re-enrolled, or added in any way to the IVS student rolls after 24 hours of Effective Date of Resolution Agreement between DCS and Indiana Virtual Education Foundation d/b/a IVS 	<p>IVS Administrator</p>	
6/20/2019	<p>Cease recruitment activities</p>	<p>IVS Administrator</p>	

	Take appropriate action to cease all recruitment activities.		
6/20/2019	<p>Talking Points Create talking points directed to parents, faculty, community and press. Focus on communicating plans for orderly transition of students and staff. Distribute to the transition team.</p>	DCS Lead IVS Lead	
6/20/2019	<p>Press Release Create and distribute a press release that includes the following:</p> <ol style="list-style-type: none"> 1. History of IVS; 2. Authorizing board closure policies; 3. Reason(s) for IVS closure; 4. Outline of support for students, parents, and staff; and 5. A press point person for the DCS and for IVS. 	DCS Lead IVS Lead	
6/21/2019	<p>Faculty Contact Information Create Faculty Contact List to include:</p> <ol style="list-style-type: none"> 1. Name; 2. Position; 3. Address; 4. Telephone; 5. Email. <p>Provide a copy of the faculty contact information to DCS Lead.</p>	IVS Lead	
6/21/2019	<p>Initial Closure Notification Letter: Faculty/Staff Distribute letter to faculty and staff outlining:</p> <ol style="list-style-type: none"> 1. Closure decision; 2. Timeline for transition; 3. Assurance that instruction will continue through the date when instruction will cease; 4. Assurance that parents/students will be assisted in the reassignment process/Help Line Information; and 5. FAQ's about the IVS closure process. 	DCS Lead IVS Lead	

6/24/2019	<p>Establish Transition Team and Assign Roles Transition team may include:</p> <ol style="list-style-type: none"> 1. Lead person from DCS staff; 2. IVS board chair or designee; 3. Lead administrator from IVS; 4. Lead finance person from IVS; 5. Lead person from IVS faculty; and 6. Lead person from IVS parent organization. 	DCS Lead IVS Lead	
6/26/2019	<p>Assign Transition Team Action Item Responsibilities</p> <ol style="list-style-type: none"> 1. Develop plan, exchange contact information and assign roles; 2. Set calendar for meetings and assign dates for completion of IVS closure action item. 	DCS Lead IVS Lead	
6/26/2019	<p>Parent Contact Information Create a Parent Contact List to include:</p> <ol style="list-style-type: none"> 1. Student name; 2. Parent name; 3. Address; 4. Telephone; 5. Email. <p>Provide a copy of the parent contact information to DCS Lead.</p>	IVS Lead	
JULY 2019			
7/3/2019	<p>Initial Closure Notification Letter: Parents Distribute letter to parents outlining</p> <ol style="list-style-type: none"> 1. Closure decision; 2. Timeline for transition; 3. Assurance that instruction will continue through the date when instruction will cease; 	DCS Lead IVS Lead	

	<ol style="list-style-type: none"> 4. Assurance that parents/students will be assisted in the reassignment process/Help Line Information; and 5. FAQ's about the IVS closure process. 		
7/3/2019	<p>Initial Closure Notification Posting</p> <p>Post closure notification on the front page of the IVS website outlining:</p> <ol style="list-style-type: none"> 1. Closure decision; 2. Timeline for transition; 3. Assurance that instruction will continue through the date when instruction will cease; 4. Assurance that parents/students will be assisted in the reassignment process/Help Line Information; and 5. FAQ's about the IVS closure process. 	IVS Lead	
7/3/2019	<p>Convene Faculty/Staff Closure Meeting</p> <p>Plan and convene a faculty meeting to:</p> <ol style="list-style-type: none"> 1. Discuss reasons for closure; 2. Emphasize importance of maintaining continuity of instruction through the last instruction day; 3. Discuss plans for helping students find new schools; 4. Identify date when last salary check will be issued, when benefits terminate, and last day of employment; 5. Describe assistance, if any, which will be provided to faculty and staff to find new positions; 6. Provide DCS Lead/IVS Lead contact information. 	DCS Lead IVS Lead IVS Administrator	
7/3/2019	<p>Initial Closure Notification Letter: State Agencies</p> <p>Send letter to the Indiana Department of Education to include:</p> <ol style="list-style-type: none"> 1. Notification materials distributed to parents; 2. Notification materials distributed to faculty and staff; 3. Authorizing board decision materials, resolution to close IVS, copy of any termination agreement. 	DCS Lead IVS Lead	

7/3/2019	<p>Notify School Districts Impacted Within one day of Effective Date of Resolution Agreement between DCS and Indiana Virtual Education Foundation d/b/a IVS, notify districts materially impacted by the closure decision, including:</p> <ol style="list-style-type: none"> 1. Copies of letters sent to stakeholders (e.g., faculty); 2. FAQ about the IVS closure process; 3. Information about the plan being developed to ensure an orderly closure process; 4. Authorizing board decision materials, resolution to close IVS, copy of any termination agreement; 5. DCS lead contact information. 	DCS Lead	
7/3/2019	<p>Agency Notifications To ensure a smooth transition for students, the following agencies must be notified of all closure decisions:</p> <ol style="list-style-type: none"> 1. Indiana State Board of Education; 2. Indiana State Board of Accounts; 3. Federal programs; 4. Teacher Retirement Program (TRF/PERF). 	DCS Lead IVS Lead	
7/9/2019	<p>Transfer Testing Materials IVS must determine state requirements regarding disposition of state assessment materials stored at IVS and return as required. Provide DCS lead with letter outlining transference of testing materials.</p>	IVS Lead IVS Administrator	
7/9/2019	<p>Final Report Card and Student Records Notice IVS must ensure that:</p> <ol style="list-style-type: none"> 1. All student records and report cards are complete and up to date; 2. Parents/Guardians are provided with copies of final report cards and notice of where student records will be sent (including specific contact information); and 	IVS Lead IVS Administrator	

	<p>3. Parents/Guardians receive a reminder letter/post card reminding them of the opportunity to access student records under state and federal law.</p> <p>Provide DCS lead with a copy of the notice.</p>		
7/9/2019	<p>U.S. Dept. of Education Filings File Federal form 269 or 269a if IVS was receiving funds directly from the United States Department of Education. See 34 CFR 80.41.</p>	IVS Financial Lead	
7/19/2019	<p>Notification of Management Company/Organization and Termination of Contract Review the management agreement and take steps needed to terminate the agreement at the end of the school year or when the charter contract expires. IVS must:</p> <ol style="list-style-type: none"> 1. Notify management company/organization of termination of education program by IVS's board, providing the last day of classes and absence of summer programs; 2. Provide notice of non-renewal/revocation in accordance with management contract; 3. Request final invoice and accounting, including an accounting of any retained IVS funds and the status of grant funds; 4. Provide notice that the management company/organization must remove any property lent to IVS after the end of classes and request a receipt of such property. <p>Provide a copy of this notification to the DCS lead.</p>	IVS Financial Lead	
7/19/2019	<p>Notification of Contractors Agreement IVS must formulate a list of all contractors with contracts in effect and:</p> <ol style="list-style-type: none"> 1. Notify them regarding IVS closure and cessation of operations; 	IVS Financial Lead	

	<ol style="list-style-type: none"> 2. Instruct contractors to make arrangements to remove any contractor property from IVS by a date certain (copying machines, water coolers, other rented property); 3. Retain records of past contracts as proof of full payment; 4. Maintain telephone, gas, electric, water, insurance; and 5. Terminate contracts for goods and services as of the last date such goods or services will be needed. <p>Provide the DCS lead with written notification of such.</p>		
7/19/2019	<p>List all Creditors and Debtors Formulate a list of IVS creditors and debtors and any amounts accrued and unpaid with respect to such creditor or debtor. The list must include:</p> <p><u>Creditors</u></p> <ul style="list-style-type: none"> • Contractor to whom IVS owes payment; • Lenders, mortgage holders, bond holders, equipment suppliers, service providers and secured and unsecured creditors. <p><u>Debtors</u></p> <ul style="list-style-type: none"> • Persons who owe IVS fees or credits, any lessees or sub-lessees of IVS, and any person holding property of IVS. 	IVS Financial Lead	
7/19/2019	<p>Notification to Creditors Solicit from each creditor a final accounting of IVS's accrued and unpaid debt. Compare the figures provided with IVS's calculation of debt and reconcile.</p> <p>Where possible, negotiate a settlement of debts consummated by a settlement agreement reflecting satisfaction and release of the existing obligations.</p> <p>Provide the DCS lead with a written summary of this activity.</p>	IVS Financial Lead	
7/19/2019	<p>Reconcile with Daleville Community Schools</p>	IVS Financial Lead	

	Reconcile DCS billings and payments. If IVS owes DCS money, it must list DCS as a creditor and treat it accordingly.		
7/19/2019	<p>Notification to Debtors</p> <p>Contact all IVS debtors and demand payment. If collection efforts are unsuccessful, consider turning the debt over to a commercial debt collection agency. All records regarding such collection or disputes by debtors regarding amounts owed must be retained.</p> <p>Provide the DCS lead with a written summary of this activity.</p>	IVS Financial Lead	
AUGUST 2019			
8/1/2019	<p>Parent/Guardian Closure Transition Letter</p> <p>Distribute letter to parents outlining</p> <ol style="list-style-type: none"> 1. Date of the last day of regular instruction; 2. Cancellation of any planned summer school; 3. Notification of mandatory enrollment under state law; 4. Dates of any planned school choice fair(s); 5. Contact and enrollment information for charter, parochial, public, and private schools in the area; 6. Information on obtaining student records pursuant to the state and federal law before the end of classes; and 7. Contact information for parent/guardian assistance questions. <p>Provide a copy of the letter/additional information to DCS Lead.</p>	IVS Lead IVS Administrator	
8/1/2019	<p>Faculty/Staff Closure Transition Letter</p> <p>Outline transition plan and timelines for staff, including but not limited to:</p> <ol style="list-style-type: none"> 1. Timeline for compensation and benefits; 2. COBRA information; 3. Pertinent licensure information; 	IVS Lead IVS Administrator	

	<ol style="list-style-type: none"> 4. Letter of recommendation/reference contact information; and 5. Transition team member contact information. <p>Provide a copy of the letter/additional information to DCS Lead.</p>		
8/1/2019	<p>Secure Student Records Ensure all student records are organized, up to date, and maintained in a secure location.</p>	<p>IVS Lead IVS Administrator</p>	
8/1/2019	<p>Transfer Student Records Identify an appropriate entity to hold student records. Send student records, including:</p> <ol style="list-style-type: none"> 1. Individual Education Programs (IEPs) and all records regarding special education and supplemental services; 2. Student health / immunization records; 3. Attendance records; 4. Any testing materials required to be maintained by IVS; 5. Student transcripts and report cards; and 6. All other student records. <p>IVS must contact the relevant districts of residence for students and notify districts of how (and when) records will be transferred. In addition, IVS must create a master list of all records to be transferred and state their destination.</p> <p>Document the transfer of records to include:</p> <ol style="list-style-type: none"> 1. The number of general and special education records transferred; 2. Date of transfer; 3. Signature and printed name of the IVS representative releasing the records; and 4. Signature and printed name of the organization who receives the records. 	<p>IVS Lead IVS Administrator</p>	

8/1/2019	<p>Review Budget/Establish Use of Reserve Funds</p> <ol style="list-style-type: none"> 1. Review budget to ensure that funds are sufficient to operate the IVS through the closure date; 2. Emphasize the legal requirement to limit expenditures to only those in the approved budget, while delaying approved expenditures that might no longer be necessary until a revised budget is approved; 3. Make revisions that take into account closure and associated expenses while prioritizing continuity of instruction; and 4. Identify acceptable use of reserve funds to support the orderly closure of IVS. 5. Share the document with DCS. 	IVS Lead	
8/12/2019	<p>Itemize Financials</p> <p>Review, prepare and make available the following:</p> <ol style="list-style-type: none"> 1. Fiscal year-end financial statements; 2. Cash analysis; 3. Bank statements for the year, investments, payables, unused checks, petty cash, bank accounts, and payroll reports including taxes; and 4. Most recent audit. <p>Additionally, collect and void all unused checks and destroy all credit and debit cards. Close accounts after transactions have cleared.</p>	IVS Financial Lead	
8/12/2019	<p>Payroll Reports</p> <p>IVS must generate a list of all payroll reports including taxes, retirement or adjustments on employee contracts.</p> <p>Provide the DCS lead with copies of all materials.</p>	IVS Financial Lead	
8/13/2019	<p>Expenditure Reporting</p>	IVS Financial Lead	

	<p>Ensure that Federal Expenditure Reports (FER) and the Annual Performance Report (APR) are completed.</p> <p>Provide DCS lead with a copy of all documents.</p>		
8/22/2019	<p>Notification of Employees and Benefit Providers</p> <p>IVS must establish an employee termination date and:</p> <ol style="list-style-type: none"> 1. Formally notify all employees of termination of employment and/or contracts; 2. Notify benefit providers of pending termination of all employees; 3. Notify all employees and providers of termination of all benefits programs; and 4. Terminate all programs as of the last date of service in accordance with applicable law and regulations (i.e. COBRA), including: <ol style="list-style-type: none"> a. Medical, dental, vision plans; b. Life insurance; c. Cafeteria plans; d. 401(k) retirement plans; and e. Pension plans. <p>Consult legal counsel as specific rules and regulations may apply to such programs.</p> <p>Provide DCS lead with a copy of all documents.</p>	IVS Financial Lead	
8/22/2019	<p>Vendors</p> <p>IVS must:</p> <ol style="list-style-type: none"> 1. Create a vendor list, including food and transportation vendors; and 2. Notify vendors of closure and cancel or non-renew agreements as appropriate. <p>Provide DCS lead with a copy of all documents.</p>	IVS Financial Lead	

8/22/2019	<p>Payment of Funds IVS must work with the DCS to prioritize payment strategy considering state and local requirements. Using available revenue and any funds from auction proceeds, pay the following entities:</p> <ol style="list-style-type: none"> 1. Retirement systems; 2. Teachers and staff; 3. Employment taxes and federal taxes; 4. Audit preparation; 5. Private creditors; 6. Overpayments from state/district; and 7. Other as identified by DCS. <p>Provide DCS lead with a copy of all materials associated with this action.</p>	DCS Lead IVS Financial Lead	
8/22/2019	<p>Disposition of Property Check with Indiana Department of Education regarding proper procedures for disposition of property purchased with federal funds.</p>	DCS Lead IVS Financial Lead	
8/22/2019	<p>Disposition of Inventory Establish a disposition plan (e.g., auction), and establish a payment process (e.g., cash, checks, credit cards) for any remaining items. Provide the DCS lead with a copy of all documents.</p>	IVS Financial Lead	
8/22/2019	<p>Disposition of Real Property (e.g., facility) (if applicable) Determine state requirements for real property acquired from a public school district to determine right of first offer and other applicable requirements for disposition.</p>	IVS Financial Lead	
SEPTEMBER 2019			
9/1/2019	Secure Financial Records	IVS Financial Lead	

	Ensure all financial records are organized, up to date, and maintained in a secure location.		
9/4/2019	<p>Property Purchased with Public Charter School Program (PCSP) Funds</p> <p>Establish under state or individual school agreements required disposition of property purchased with PCSP funds. Generally, property purchased with PCSP funds must first be offered to other charter schools within the same region in which IVS is located. If no school wants the property, an auction must be held to dispose of the PCSP assets. IVS must:</p> <ol style="list-style-type: none"> 1. Ensure public notice of the auction is made widely known; 2. Price items at fair market value, as determined from inventory and fixed assets policy; and 3. Determine with the IDOE how to return funds if any remain. <p>Provide the DCS lead board resolutions and minutes of any transfer of assets with a dollar value of zero (0) to another school.</p>	IVS Financial Lead	
NOVEMBER 2019			
11/1/2019	<p>Prepare Final Financial Statement</p> <p>Retain an independent accountant to prepare a final statement of the status of all contracts and other obligations of IVS, and all funds owed to IVS, showing:</p> <ol style="list-style-type: none"> 1. All assets and the value and location thereof; 2. Each remaining creditor and amounts owed; 3. Statement that all debts have been collected or that good faith efforts have been made to collect same; and 4. Each remaining debtor and the amounts owed. <p>Provide a copy of the final statement to DCS lead.</p>	IVS Financial Lead	
11/9/2019	Submit Final Report	IVS Lead	

	Submit a final report to DCS detailing completion of the closure plan.		
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