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STAFF REPORT

Office of the Acting Superintendent
Chandra Hayes, Ed.D.

Board Meeting Date:	November 12, 2026
Agenda Title:	Strengthening Compliance, Transparency, and Public Trust: 30-60-90 Day Plan
Functional Area Impact:	Division-wide (Office of the Superintendent, Legal, Fiscal Services, Human Resources, Communications, Student Services)
Requested Action:	Endorse the 30-60-90 day plan (Attachment A) and the schedule of public progress reports to the Board, and authorize and direct the Acting Superintendent to carry out the actions in the plan.
Department / Agency Lead:	Office of the Superintendent
Staff Lead:	Chandra Hayes, Ed.D. – Acting Superintendent

EXECUTIVE SUMMARY

At its Oct. 22, 2026, meeting, the School Board directed the Acting Superintendent to develop a 30-60-90 day plan to strengthen compliance, transparency, and public trust, including establishment of an Office of Organizational Compliance and Constituent Services. This report responds to that direction.

On Oct. 27, the Virginia Department of Education (VDOE) set out a framework for state support under Va. Code § 22.1-23. It requires ACPS to hire an independent consultant to review division policies, practices, and organizational culture related to mandatory reporting, and to meet specific requirements for VDOE review of that work. The plan addresses every requirement in the letter. Actions that respond to it are marked "VDOE" in Attachment A, and Attachment B shows how each requirement is met. The rest of the plan is broader, covering constituent services, FOIA, compliance tracking, internal audit, and public reporting.

The plan also sets the schedule for a reorganization of the division to address a structure that has limited succession and backup capacity at the senior level. The Board must act on it in January 2027 so it can be reflected in the FY 2027–28 budget. Progress will be reported to the Board in public at Days 30, 60, and 90.

Staff requests that the School Board endorse the 30-60-90 day plan in Attachment A and the schedule of public progress reports described in this report. Further, Board is asked to authorize and direct the Acting Superintendent to implement the plan to carry out the actions in Attachment A, beginning in the first 30 days. Actions that by law or Board policy require a separate Board vote will come forward separately. Endorsing the plan now gives the Acting Superintendent clear authority and direction from the Board and gives the community a public timeline against which to measure the division's progress.

BACKGROUND

This plan responds to the School Board's Oct. 22 direction and incorporates the requirements of VDOE's Oct. 27 letter. The first phase includes work completed to date and runs through Dec. 12 (30 days from this meeting). The second and third phases follow at 30-day intervals. The plan is organized around three commitments: 1) build durable structure and staff capacity; 2) report results to the community on a predictable schedule; and 3) bring in independent expertise where it strengthens capacity.

Main Point #1: Trust is rebuilt by consistent follow-through that the community can see.

What we have heard. Families and community members have told us they do not know where to start when a concern is not resolved at their school. The division does not report publicly on FOIA timeliness, child-protective referrals, or required training completion. The School Board often receives operational concerns with no clear place to route them. The Albemarle County Board of Supervisors adopted a resolution on Oct. 15 addressing FOIA and transparency, and VDOE has asked the division to confirm that its policies, protocols, and culture support swift reporting of suspected child abuse and neglect.

What has already been done. The Acting Superintendent has met three times with VDOE, including Superintendent of Public Instruction Jenna Conway. Dr. Hayes requested proposals from three firms for the independent review and, on Oct. 30, received a scope of work and cost proposal from the firm considered the strongest of those received (the Contractor). She submitted draft job descriptions for the Director of Organizational Compliance and Constituent Services and a Compliance and Constituent Services Coordinator to the Human Resources Office for classification and compensation review, met with Fiscal Services on how to fund the new office if approved by the School Board, and identified potential vendors for platform(s) to house CPS, mandated reporting, and complaint data. Staff began review of potential vendors for a whistleblower reporting and tracking solution and advertised the vacant office administrator position that will support the FOIA Officer. Two new webpages are live: one explains how staff and families can report a concern, and one explains the ACPS leave process and how the division notifies the affected school community.

Whistleblower reporting. Employees and community members can currently report concerns through the Albemarle County Government whistleblower hotline, but that hotline has not been effectively implemented to provide adequate feedback for the school division. ACPS and the County are separate organizations, and to the extent their operations are separate, each is able to operate more effectively and efficiently by establishing their own processes specific to the needs of their operations. The division's process will be managed by the Director of Organizational Compliance and Constituent Services, so ACPS will simply need to implement a solution for receiving and tracking reports.

Main Point #2: The VDOE requirements are specific, and the plan meets each of them.

What VDOE requires. VDOE's Oct. 27 letter is focused on one question: whether ACPS policies, protocols, and organizational culture support swift and immediate reporting as required by law, including suspected child abuse and neglect. It requires ACPS to hire a qualified, independent consultant within 10 business days to review those policies, practices, and culture. It also requires ACPS to meet regularly with VDOE; submit the scope of work for VDOE review and approval; allow VDOE to evaluate the contractor before the contract is signed; set explicit deadlines for an interim report and a final report; and send both reports to VDOE at the same time they are sent to ACPS. After the review, VDOE will help the division set timelines to carry out the recommendations and will provide technical assistance. VDOE's support is administrative and is structured so as not to interfere with any criminal proceedings.

How the plan responds. Attachment A marks 22 actions as "VDOE." These include every action the letter requires, plus division actions that directly strengthen mandatory reporting: a secure process for tracking reports to Child Protective Services, verified completion of mandated reporter training, a written mandated reporting procedure, and a log of corrective actions. Attachment B lists each VDOE requirement, the plan items that meet it, and its current status.

The independent review. The Contractor has proposed an organizational study of the division, with deeper reviews of Human Resources and Fiscal Services. Because Human Resources administers the division's mandatory-reporting processes, that review includes a focused evaluation of mandatory-reporting policies, practices, responsibilities, and culture, which the VDOE requires. The review is administrative and systemic; it will not investigate individual allegations or determine employee misconduct. The acting superintendent proposes to begin in November, deliver an interim report in February 2027 and a final report in April 2027, and to send each to ACPS and VDOE at the same time. VDOE shall approve the recommended contractor and specify the scope of work and reporting requirements to address its concerns.

Corrective action does not wait. When the review, the procedure inventory, or the division's own testing identifies an urgent problem, the responsible office will begin correcting it immediately. Each corrective action will be logged with an owner, a deadline, and the evidence to demonstrate that it is complete. The log will be reported to the Board and to VDOE at each checkpoint.

Main Point #3: The division needs an organizational structure that strengthens its focus on teaching and learning, provides greater depth, and improves efficiency.

The need. ACPS needs a structure that strengthens the division's education focus, provides depth in leadership, allows for greater efficiencies, and is more responsive to the instructional needs and demands of its schools. The structure should also support the compliance, constituent services, and quality improvement functions described in this plan.

Office of Organizational Compliance and Constituent Services. The office reports to the School Board for scope and accountability and to the Superintendent for daily operational management. It reviews practices to support continuous quality improvement of division operations, policies, and practices. The office does not oversee the division: operational oversight is the role of the Superintendent, and policy oversight is the role of the School Board.

Independent recommendations. The Contractor's organizational study will review the organizational structure, staffing, roles, and reporting relationships and recommend changes. The Contractor's organizational and staffing analysis is expected in December 2026, and will be used to inform a superintendent recommendation for reorganization to be presented in January 2027.

Why January. Changes that affect positions and costs need to be settled before the FY 2027–28 budget is built. Staff will use the Contractor's preliminary analysis to present a proposed structure to the Board on Jan. 14, 2027. Any further changes recommended in the Contractor's final report will come to the Board after it is received.

Main Point #4: An ongoing internal audit function will continue independent review after the initial review ends.

Contracted Services. Staff expects the Contractor to serve as the division's contracted management internal auditor, with the organizational study as its first engagement. The Director of Organizational

Compliance and Constituent Services will ultimately serve as contract administrator. Under the framework the Board is being asked to approve, the internal auditor reports to the Board through a Board Audit Committee and follows an annual audit plan the Board approves. Later engagements, such as an audit of FOIA response practices, would be proposed through that audit plan. Like the Office of Organizational Compliance and Constituent Services, the internal audit function reviews practices to support continuous quality improvement of operations, policies, and practices. Neither the Contractor nor the DOCCS oversees the division; that remains the role of the Superintendent for operations and the School Board for policy.

Safeguards. The DOCCS's role is administrative and manages the scheduling, document requests, and invoicing. The auditor sets its own procedures and conclusions. Reports from the VDOE-required review go to ACPS and VDOE at the same time. Because the organizational study may make recommendations about the new office itself, the Board will designate an alternate liaison for any part of the work that involves that office.

Main Point #5: Each 30-day phase has a defined purpose and ends with results the Board can verify.

Days 1–30: Establish the foundation (through Dec. 12). The first phase completes the steps VDOE requires to start the independent review: VDOE approval of the scope and contractor, a signed contract with interim and final report deadlines, a project kickoff, and delivery of all requested data within two weeks. The Board is asked to act on establishing the Office of Organizational Compliance and Constituent Services, the internal audit framework, and one-time funding. The Acting Superintendent will post the Director of Organizational Compliance and Constituent Services (DOCCS) search and identify candidates to interview. Staff will also start an interim central FOIA log, inventory existing procedures, and complete onboarding of communications support.

Days 31–60: Build structure (Dec. 13 – Jan. 11). The second phase puts working procedures in place. The Acting Superintendent will bring the finalist for the DOCCS position for Board consideration. Mandatory-reporting work is the primary focus in this phase. A secure process for tracking reports to Child Protective Services, with access restricted to designated staff; training completion checks; a written mandated reporting procedure; and a corrective action log will be brought forward. The DOCCS, or an interim lead until the DOCCS starts, will work with Legal and the staff who own each process to implement documented constituent intake and escalation, draft and test FOIA procedures with trained backup coverage, confirm who owns each compliance obligation, and launch the division's whistleblower reporting and tracking system. Staff will use the Contractor's preliminary organizational and staffing analysis, expected in December, to develop the proposed reorganization. This phase includes winter break, and the targets reflect that.

Days 61–90: Report and sustain (Jan. 12 – Feb. 10). The third phase brings the reorganization to the Board for action, continues the independent review through site visits and interviews, and delivers the interim report to ACPS and VDOE. The DOCCS will hire a Compliance and Constituent Services Coordinator to support the work of the office. Staff will finalize procedures and the training calendar, ask the Board to adopt the Internal Audit Charter, implement or demonstrate the reporting platform, publish the first quarterly compliance report, bring hotline procedures to the Board, and include the reorganization and ongoing costs in the FY 2027–28 funding request.

Main Point #6: The Board and the community will see progress on a predictable public schedule.

Public checkpoints. The Acting Superintendent will report to the Board in open session at each 30-day period and provide a parallel update to VDOE. Every update will use the same format: each item in

Attachment A will be marked complete, on track, or delayed. When an item is delayed, the update will say why and give a revised date.

Checkpoint	What the Board will receive
Day 30 **Dec. 10, 2026**	Status of Days 1–30 items, with VDOE items reported first; independent review contract, kickoff, and data delivery; procedure inventory and gaps; first weeks of FOIA log data
Day 60 **Jan. 14, 2027**	Status of Days 31–60 items; DOCCS recommendation for Board consent; whistleblower reporting system launch; independent review progress and corrective action log; CPS tracking, training checks, and mandated reporting procedure; proposed reorganization; vendor selections and costs; draft Internal Audit Charter
Day 90 **Feb. 11, 2027**	Status of all items; interim report from the independent review; Board action on the reorganization; first quarterly compliance report; corrective action log; proposed plan for the next phase

Reporting that continues after Day 90. The quarterly compliance report, the dashboard, the Superintendent's communication schedule, and regular VDOE meetings are designed to continue after this plan ends. Compliance reports will contain aggregate data only, with no information that could identify a student, family, or employee. The first report will establish a baseline and note where data are incomplete.

Main Point #7: The plan is candid about what will take longer than 90 days.

Some results depend on the consultant's work or the budget calendar and will not be complete by Feb. 10:

- **Independent review reports.** The interim report is expected in February 2027 and the final report in April 2027. Urgent corrective actions will proceed in the meantime.
- **Implementation with VDOE.** After the final report, the division will set implementation timelines with VDOE and use its technical assistance.
- **Further organizational changes.** Any additional changes recommended in the final report will come to the Board after April.
- **Internal audit plan.** The auditor's risk assessment will lead to a proposed annual audit plan in May 2027.
- **Ongoing funding.** Recurring costs will be decided through adoption of the FY 2027–28 budget.

STAFF RECOMMENDATION

Staff recommends that the School Board endorse the 30-60-90 day plan (Attachment A) as the framework for the division's work to strengthen compliance, transparency, and public trust and to meet the requirements of VDOE's Oct. 27, 2026, letter; authorize and direct the Acting Superintendent to implement the plan, including the actions in Attachment A, without further Board approval; and direct the Acting Superintendent to report progress in public at the Board's Dec. 10, 2026, Jan. 14, 2027, and Feb. 11, 2027 meetings. Staff will bring forward separately only those actions that by law or Board policy require a Board vote, including establishment of the Office of Organizational Compliance and Constituent Services, consent to the DOCCS appointment, the internal audit framework and charter, one-time funding, the reorganization plan, and any policy changes for the whistleblower hotline.

Service Level / Policy Impact

If endorsed, the Board, staff, VDOE, and the community will work from one public timeline with named leads and defined results, and the actions VDOE requires will be clearly identified and tracked. Families and staff already have clearer information on how to report a concern and how leave is handled, and the plan adds secure CPS tracking, verified mandated reporter training, a written mandated reporting procedure, documented constituent intake, and tested FOIA procedures. A January decision on the reorganization allows a structure with a stronger education focus, more leadership depth, and better support for schools to be funded in FY 2027–28. If not endorsed, staff can continue the work administratively, but without a Board-endorsed benchmark the division would have less ability to show steady progress to the community, the County, and VDOE. Endorsing the plan does not change Board policy. Policy changes will come to the Board separately.

Fiscal Impact

The anticipated one-time cost of the Contractor's organizational study, including the VDOE-required review, is $240,000. Estimated one-time FY 2026–27 costs for the new Office of Organizational Compliance and Constituent Services are estimated at $200,000 for staffing and operations. This includes the proposed Director of Organizational Compliance and Constituent Services, the proposed Compliance and Constituent Services Coordinator position, and operation and systems costs for reporting and tracking of data. Contracted communications support is estimated at $25,000. Cost for administrative support for FOIA response is estimated at $50,000 for FY2026-27. Costs for the whistleblower reporting system and the compliance data platform will be presented to the Board before funds are committed. These one-time costs will be fully funded using the additional state revenues that were released after the School Board adopted the FY 2026–27 Budget, which have not yet been appropriated. Once the proposals are finalized and HR completes the classification and compensation review for the new positions, staff will bring forward an appropriation request to the School Board at its December 10 meeting. Ongoing costs will be requested through the FY 2027–28 budget process.

Legal Impact

Adoption of this plan strengthens the School Board's oversight responsibilities. The School Board supervises the schools in the division and may direct the work described in this plan (Va. Code § 22.1-79). Authorizing and directing the Acting Superintendent to implement the plan does not delegate the Board's authority to appropriate funds, adopt policy, approve the reorganization, or consent to appointments; those actions will come to the Board for a vote. VDOE's support of the independent review is provided under Va. Code § 22.1-23, is administrative in nature, and is structured so as not to interfere with any ongoing or potential criminal proceedings. The review will not investigate individual allegations nor determine employee misconduct. The Contractor proposes to perform the work under a cooperative contract. Procurement and Legal will confirm

it meets the cooperative procurement requirements of the Virginia Public Procurement Act (Va. Code § 2.2-4304). The plan supports mandated reporting requirements for school personnel (Va. Code § 63.2-1509); access to CPS tracking information will be restricted, and public reporting on child-protective referrals will be limited to aggregate data.

STAFF CONTACT INFORMATION

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ATTACHMENTS

1. Attachment A: 30-60-90 Day Plan, through Feb. 10, 2027
2. Attachment B: VDOE Requirements and How the Plan Meets Them
3. Attachment C: Status by Area of Work as of Nov. 12, 2026

ATTACHMENT A

30-60-90 Day Plan, through Feb. 10, 2027

VDOE marks actions that respond to VDOE's Oct. 27, 2026, letter, which directly strengthen mandatory reporting. Unmarked actions are part of the division's broader plan. Days 1–30 include work completed to date and run through Dec. 12, 2026. Leads are proposed. Board meeting dates in 2027 are tentative until the Board adopts its 2027 meeting calendar on Jan. 14, 2027. DOCCS refers to the Director of Organizational Compliance and Constituent Services.

#	VDOE	Action	Proposed Lead	Done when
Days 1–30 (through Dec. 12, 2026) — Establish the foundation				
Completed to date				
1	**VDOE**	Met three times with VDOE, including Superintendent of Public Instruction Jenna Conway, on a framework for state support	Acting Superintendent; School Board Chair	Complete
2	**VDOE**	Requested proposals from three firms for the independent review of policies, practices, and organizational culture related to mandatory reporting	Acting Superintendent; Procurement	Complete
3	**VDOE**	Received scope of work and cost proposal from the Contractor for an organizational study that includes the required mandatory-reporting review (Oct. 30)	Acting Superintendent	Complete
4		Submitted draft job descriptions for the Director of Organizational Compliance and Constituent Services and a Compliance and Constituent Services Coordinator	Acting Superintendent; Human Resources	Complete
5		Began onboarding a contracted communications firm to support the Office of Communications	Superintendent's Office; Procurement	Onboarding under way
6		Began review of vendors that provide whistleblower reporting and tracking solutions	Superintendent's Office	Review under way
7		Identified vendors that can house CPS, FOIA, mandated reporting, and third-party complaint data	Acting Superintendent; Technology	Complete
8		Launched a webpage that explains how staff and families can report a concern	Communications	Live

#	VDOE	Action	Proposed Lead	Done when
9		Launched a webpage that explains the ACPS leave process and how the division notifies the affected school community	Communications	Live
10		Met with Fiscal Services on the current budget and on funding the staff needed to establish the Office of Organizational Compliance and Constituent Services	Acting Superintendent; Fiscal Services	Complete
To be completed by Day 30				
11	**VDOE**	Submit the independent review scope of work to VDOE for review and approval	Acting Superintendent	VDOE approval received
12	**VDOE**	Give VDOE the opportunity to evaluate the selected contractor before the contract is signed	Acting Superintendent	VDOE review complete
13	**VDOE**	Execute the independent review contract (VDOE deadline: 10 business days from Oct. 27)	Superintendent's Office; Procurement; Legal	Contract signed
14	**VDOE**	Set explicit contract deadlines for an interim report and the final report, each delivered to VDOE at the same time as to ACPS	Superintendent's Office; Legal	Deadlines in signed contract
15	**VDOE**	Hold project kickoff with the consultant and designate the ACPS project liaison	Superintendent's Office	Kickoff held; weekly status meetings set
16	**VDOE**	Provide all requested data and documents within two weeks of the request, including mandatory-reporting policies, procedures, training materials, and reporting tools	Human Resources; Superintendent's Office; department leads	Data request fulfilled on time
17	**VDOE**	Set a standing schedule of progress meetings with VDOE for the duration of the review	Acting Superintendent	Schedule set
18		Board acts on establishing the Office of Organizational Compliance and Constituent Services, the internal audit framework, and one-time funding	School Board; Superintendent's Office	Board votes taken in open session
19		Assign the staff member who will support the FOIA Officer; start an interim central FOIA log and deadline calendar	FOIA Officer; Human Resources	Every new request logged with date received, due date, and owner

#	VDOE	Action	Proposed Lead	Done when
20		Complete onboarding of the contracted communications firm	Superintendent's Office; Procurement	Support in place
21		Complete inventory of existing procedures for FOIA, Title IX, mandated reporting, complaints, and crisis response	Superintendent's Office; Legal	Inventory complete; gaps reported in Day 30 update
22		Confirm funding for office staffing and the independent review, and estimate ongoing costs for the FY 2027–28 budget	Superintendent's Office; Fiscal Services	Costs reported in Day 30 update
23		Publish the Superintendent's communication schedule for staff, families, and the community	Communications	Schedule posted
24	**VDOE**	Day 30 progress update to the Board at Dec. 10, 2026 meeting; parallel update to VDOE	Acting Superintendent	Status of every item reported in public
Days 31–60 (Dec. 13, 2026 – Jan. 11, 2027) — Build structure				
25		Complete screening, structured interviews, reference checks, and background checks for the DOCCS, and recommend a candidate for Board consent	Acting Superintendent; Human Resources	Recommendation ready for Board consent at Jan. 14, 2027 meeting
26		Confirm the contract vehicle for the contracted internal audit function, administered by the DOCCS	Procurement; Legal; Fiscal Services	Contract vehicle confirmed
27	**VDOE**	Implement a secure process for tracking reports to Child Protective Services, with restricted access	Legal	Process in use; access limited to designated staff
28	**VDOE**	Implement completion checks for mandated reporter training (and Title IX training)	Human Resources	Completion verified by school and department
29	**VDOE**	Draft a mandated reporting SOP covering who reports, how and when, escalation, documentation, and annual training	Legal; Human Resources	Draft circulated for review
30	**VDOE**	Begin urgent corrective actions as issues are identified, without waiting for the final report; record owner, deadline, and evidence for each	Acting Superintendent; operational owners	Corrective action log maintained and reported at each checkpoint

#	VDOE	Action	Proposed Lead	Done when
31		Receive the consultant's preliminary organizational and staffing analysis	Contractor	Analysis received (December 2026)
32		Develop the proposed reorganization plan to strengthen the division's education focus, leadership depth, efficiency, and responsiveness to schools, informed by the consultant's preliminary analysis	Acting Superintendent; Human Resources; Fiscal Services	Proposed structure and cost ready for the Board
33		Implement a documented constituent intake and escalation process	DOCCS or interim lead	Process in use; inquiries logged and tracked to resolution
34		Draft and test FOIA procedures covering intake, deadline tracking, searches, review, redaction, charges, and records preservation; establish backup coverage	DOCCS or interim lead; Legal; FOIA Officer	Procedures tested on live requests; trained backup named
35		Confirm who owns each compliance obligation and what evidence of compliance is required	DOCCS or interim lead; Legal; operational owners	Owner and evidence documented for every obligation
36		Finalize the compliance reporting plan: measures, data sources, owners, and quarterly schedule	Superintendent's Office; Communications	Measures shared with the Board
37		Evaluate vendors for the compliance reporting platform and the whistleblower reporting and tracking solution, and select products	Superintendent's Office; Technology; Procurement	Selections made; costs reported to the Board before funds are committed
38		Draft the Internal Audit Charter; School Board appoints the Board Audit Committee	Legal; School Board	Draft charter to the Board; committee members named
39		Draft whistleblower hotline procedures and anti-retaliation policy language	DOCCS; Human Resources; Legal	Draft ready for Board review
40		Launch the whistleblower reporting and tracking system, managed by the DOCCS	DOCCS; Legal	System live; activity reported to the Board
41		Complete the crisis plan review; identify needed revisions and any external support	Communications; Safety & Security	Revisions and support needs identified
Days 61–90 (Jan. 12 – Feb. 10, 2027) — Report and sustain				

#	VDOE	Action	Proposed Lead	Done when
42	**VDOE**	Day 60 progress update to the Board, including independent review status and the corrective action log Jan. 14, 2027 meeting; parallel update to VDOE	Acting Superintendent	Status of every item reported in public
43		Present the proposed reorganization plan to the Board Jan. 14, 2027 meeting	Acting Superintendent	Proposal presented
44		Board acts on the reorganization plan so it can be reflected in the FY 2027–28 budget Jan. 14, 2027 meeting	School Board	Board vote taken
45		Hire the Compliance and Constituent Services Coordinator to support the work of the office	DOCCS; Human Resources	Coordinator hired
46	**VDOE**	Consultant site visit and stakeholder interviews; ACPS leaders and staff available as scheduled	Contractor; ACPS project liaison	Interviews complete (January–February 2027)
47	**VDOE**	Interim report delivered to ACPS and VDOE at the same time; ACPS returns one consolidated set of comments within two weeks	Contractor	Interim report received (February 2027); comments returned
48	**VDOE**	Finalize the mandated reporting SOP, FOIA procedures, and training SOPs; set the annual training calendar	Legal; Human Resources; Communications	Procedures issued to staff; tracking in place
49		Board adopts the Internal Audit Charter; Board Audit Committee begins meeting	School Board; Board Audit Committee	Charter adopted; first committee meeting held
50		Implement the reporting platform, or present a working version, to support quarterly reporting and the public dashboard	Technology; Superintendent's Office	Platform in use or demonstrated to the Board
51		Publish the first quarterly compliance report (aggregate data only)	Superintendent's Office; Communications	Report posted; baseline established
52		Bring whistleblower hotline procedures and any needed policy changes to the Board	Superintendent's Office; Legal	Board action item presented
53		Include the reorganization and ongoing costs for the office, internal audit, and related systems in the FY 2027–28 funding request	Acting Superintendent; Fiscal Services	Costs shown in the proposed budget

#	VDOE	Action	Proposed Lead	Done when
54	**VDOE**	Day 90 progress report to the Board, with the plan for the next phase at Feb. 11, 2027 meeting; parallel update to VDOE	Acting Superintendent	Report presented; next-phase plan proposed

After Day 90 — Results that depend on the consultant's work or the budget calendar				
55	**VDOE**	Final report delivered to ACPS and VDOE at the same time and presented to the Board	Contractor	Final report presented (April 2027)
56	**VDOE**	Set implementation timelines for the recommendations with VDOE and use VDOE technical assistance, including on policy revisions	Acting Superintendent; DOCCS	Implementation plan agreed with VDOE
57		Consider further organizational adjustments based on the final report	Acting Superintendent; School Board	Recommendations addressed
58		Annual risk assessment and audit plan presented for Board approval, including a proposed audit of FOIA response practices	Contracted internal auditor; Board Audit Committee	Audit plan approved
59		FY 2027–28 budget adopted with the reorganization and ongoing costs for this work	School Board; Fiscal Services	Budget adopted

ATTACHMENT B

VDOE Requirements and How the Plan Meets Them

Requirements are from VDOE's Oct. 27, 2026, letter to the School Board Chair, School Board members, and Acting Superintendent.

VDOE requirement	How the plan meets it	Plan items	Status as of Nov. 12
Required by the letter			
Hire a high-quality independent consultant within 10 business days to review policies, practices, and culture related to mandatory reporting	Proposals requested from three firms; Contractor proposal received Oct. 30	2, 3, 13, 15	Recommendation pending Board action; contract to follow
Participate in bi-weekly meetings with VDOE	Three meetings held; standing schedule for the review; parallel VDOE update at each checkpoint	1, 17, 24, 42, 54	Three meetings held
Submit the scope of work for VDOE review and approval	Contractor scope submitted to VDOE	11	Submitted Nov. 5
Allow VDOE to evaluate the contractor before the contract is signed	VDOE review before execution	12, 13	Received Nov. 6
Set a clear timeline with explicit deadlines for an interim report and a final report	Interim February 2027 and final April 2027 per proposal; interim report deadline added to contract	14, 47, 55	Interim February 2027; final April 2027
Submit interim and final reports to VDOE at the same time as to ACPS	Built into the Contractor's proposal for interim and final reports	14, 47, 55	In proposal
Work with VDOE on implementation timelines and technical assistance after the review	Implementation plan set with VDOE after the final report	56	After final report
Division actions that support the letter's focus			
Provide the consultant timely access to data, documents, and staff	Data within two weeks of request; leaders and staff available for interviews	16, 46	Begins at kickoff

VDOE requirement	How the plan meets it	Plan items	Status as of Nov. 12
Strengthen mandatory-reporting practice now	Secure CPS tracking; training completion checks; written mandated reporting procedure	27, 28, 29, 48	Days 31–90
Correct problems as they are found	Corrective action log with owner, deadline, and evidence, reported to the Board and VDOE	30, 42, 54	Begins Days 31–60

ATTACHMENT C

Status by Area of Work as of Nov. 12, 2026

Shows where each area of work in this plan stands as of this meeting and where it appears in Attachment A.

Area of work	Status as of Nov. 12	Plan items (Attachment A)
Independent review required by VDOE	Contractor proposal received; scope submitted to VDOE Nov. 5; VDOE evaluation of the contractor received Nov. 6; contract pending Board action	2, 3, 11, 12, 13, 14, 15, 16
Mandatory reporting practice	Procedure inventory in progress	27, 28, 29, 30, 48
Reorganization plan	Board action planned for January 2027	31, 32, 43, 44, 53
Office of Organizational Compliance and Constituent Services; Director position	Draft job descriptions submitted for the Director and a Compliance and Constituent Services Coordinator; Board action on establishment requested	4, 18, 25, 33, 35, 45
Funding	Met with Fiscal Services; one-time funding requested	10, 18, 22, 53
Contracted management internal audit function	Contractor expected to serve as internal auditor; Board action on framework requested	18, 26, 38, 49, 58
Dedicated FOIA support and procedures	Staff member to support the FOIA Officer being identified	19, 34, 48
Contracted communications support	Onboarding of a communications firm under way with Procurement	5, 20
Whistleblower hotline	Staff reviewing vendors for a reporting and tracking solution; process to be managed by the DOCCS	6, 37, 39, 40, 52
Quarterly compliance reporting and public dashboard	Two vendors identified for a single compliance data platform	7, 36, 37, 50, 51
Public information on reporting concerns and staff leave	Two webpages launched	8, 9
Superintendent communication schedule	Scheduled for next 30 days	23
Crisis management plan review	Scheduled for Days 31–60	41