



# Class D Commercial Drive School Non- Compliance Disciplinary Protocol

Class D Drive Schools

3-24-2025

## Revision History

<b>Effective Date of SOP:</b> 3/24/2025	<b>SOP Number:</b> E.04
<b>Functional Area Name:</b> Drive Schools	<b>Division Name:</b> Class D
<b>Last Review Date:</b> 2/21/2025	<b>Last Reviewer:</b> Roxann Donatini, Designated Examiner Manager
<b>Next Review Date:</b> 2/21/2025	<b>Next Reviewer:</b> Designated Examiner Manager
<b>Executive Approval Date:</b> 3/17/2025	<b>Approved By:</b> Caitlin Owen, Chief Development & Support Officer

## Overview

This standard operating procedure (SOP) covers the steps for addressing and escalating instances of noncompliance with statute or administrative code by a Class D Commercial Drive School (DS).

## Purpose

This SOP provides a detailed process for identifying, documenting, and addressing non-compliance by a Drive School, including the steps for escalating the issue to higher authorities if necessary.

## Policy Statement

These procedures apply to all instances of noncompliance by Drive Schools with relevant statute or code. The goal is to ensure consistent and fair handling of infractions, maintaining the integrity of the examination process.

## Compliance

**OAC 670:15-37 - Driver Education Instruction**

## Systems

System	Function
School/DE Audit Team SharePoint	Internal shared drive for storing DE-related forms, checklists, and guidelines
DE Schools Database	Microsoft Access database used for storing DS records

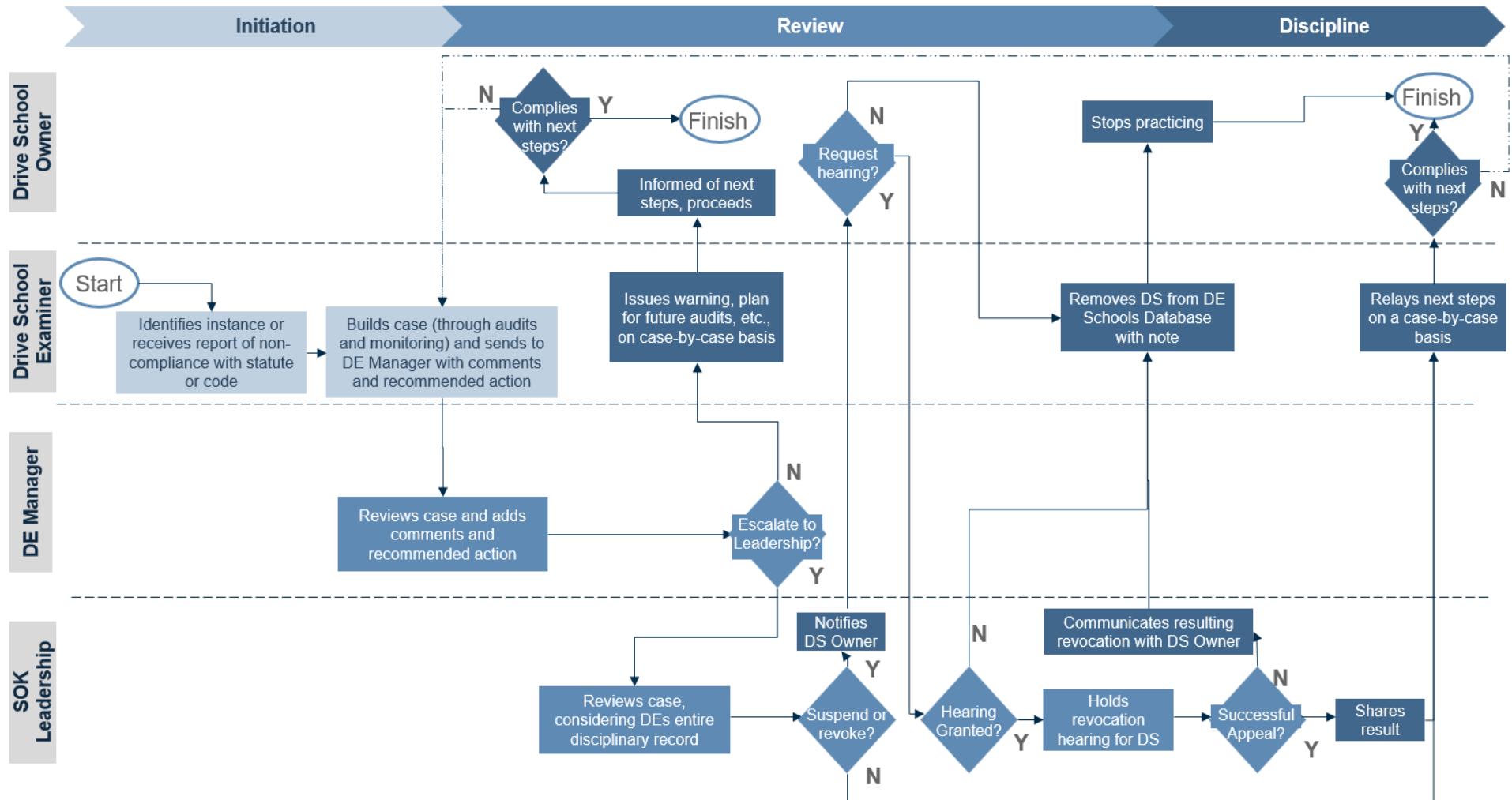
## Roles

Role	Responsibilities
Drive School (DS)	School under review by SOK.



Drive School Owner	Owner of the DS under review by SOK
Drive School Examiner (DSE)	SOK employee responsible first for reporting a DS infraction and communicating disciplinary outcomes
Designated Examiner Manager	SOK employee who reviews DS infraction cases and makes disciplinary/escalation decisions
SOK Leadership	Rotating team that makes final decisions on DS license revocation and conducts hearings.

Process Map – Class D Commercial Drive School Non-Compliance Disciplinary Protocol



## Procedures

### Process #1: Drive School Non-Compliance Disciplinary Protocol

**Purpose:** This process provides detailed steps for identifying, documenting, and addressing non-compliance by a Drive School, including the steps for escalating the issue to higher authorities if necessary.

#### Background:

#### Process Step-by-Step:

1. Once a DSE becomes aware of an instance of non-compliance, they will create a paper and digital incident report folder. Any audits performed during the investigation will be documented in the written record of the database. The DSE should review the case and recommend a course of action before bringing the case to the attention of the DE Manager.
2. The DE Manager reviews the case and adds their input/comments. Based on their understanding of the case, the DE Manager can take one of two steps:
  - a. **No Action:** The DE Manager could take no action for two separate reasons:
    - i. Infraction is minor. The DSE would notify the school owner/operator of the infraction and instruct on any corrective action needed. Follow-up audits may be required to monitor compliance.
    - ii. Not enough evidence: The DE Manager could decide that not enough evidence existed for a case and recommend the DSE conduct further investigative actions or monitor DS for further evidence of violation.
  - b. **Escalate to Leadership:** For serious or persistent infractions, the DE Manager may escalate the case to SOK Leadership to consider revoking the DS's license. This may still involve intermediary communication with the school owner, such as warnings or next steps.
3. If a case is escalated, SOK Leadership will review the case along with the recommended actions from the DSE/DE Manager. The leadership team may include General Counsel, the Chief Development and Support Officer, and, if necessary, the CEO and COO. Leadership will convene to decide whether to revoke the school's license.
  - a. If leadership chooses NOT to revoke, a DSE will notify the school owner/operator of the infraction and instruct on any corrective action needed. The DSE will note the leadership review and disciplinary action in the DS's Incident Report folder.
  - b. If leadership decides to revoke the school's license, the DE has the right to request a hearing. If the DE does not request a hearing, proceed to Step 5. If the DE requests a hearing, leadership can choose to grant or deny it. If leadership denies the hearing, proceed to Step 5.
4. If a hearing is granted, legal team will conduct a hearing for the DS Owner where they will hear the details of their infraction and make a case for themselves. Leadership will consider the appeal.
  - a. If the DS's appeal is denied, proceed to Step 5

- b. If the DS's appeal is successful, leadership will share this result with them. A successful appeal, however, still may require disciplinary action such as further audits to ensure maintained compliance, which will be communicated by a DSE.

**Note:** For a full description of hearing procedures, roles, and regulations, see **OAC 670:15-37-16. - Hearings**

- 5. If an appeal is unsuccessful, hearing is denied, or a hearing is not requested of a decision to revoke, SOK will proceed with the revocation. SOK leadership will communicate the result of the hearing with the DS Owner.
- 6. A DSE will mark the location as closed and make remarks about revocation in Notes field, noting the revocation. The school must cease practicing examinations, and the DSE may check up on the location/website occasionally to ensure compliance. This marks the final closure of the DE Disciplinary Protocol.