Licensed Operator Issue Escalation

Partnerships

2-18-2025

Contents

Revision History

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Overview

These standard operating procedures (SOPs) outline the process for escalating any issues related to Licensed Operators that are reported to or identified by Service Oklahoma employees. The procedures address who to inform when and how to work with the Service Oklahoma (SOK) Operator Board to reach a conclusion should such an escalation become necessary.

Purpose

The purpose of this document is to help SOK employees understand what to do if they encounter an issue with a Licensed Operator, and to ensure all related decisions and communications comply with federal regulations, state statutes, and SOK policies.

Policy Statement

This SOP applies to all SOK employees and all scenarios in which they may learn of an issue with a Licensed Operator. Most issues are found by the Audit and Customer Experience teams, but other departments should also be aware of the procedures so that they are prepared if they encounter any issues.

Compliance

The relationship between SOK and its Licensed Operators is governed by the Oklahoma Statute 47 O.S. §1140. Hearing procedures are subject to additional regulations, including the Administrative Procedures Act and the Open Meetings Act. Other relevant policies will depend on the type of issue being brought forward.

Systems

These procedures do not involve any digital systems or software.

Roles

List the roles and functions of anyone involved in the operations described within this document.

Role	Responsibilities
Identifying Employee	Gathers facts, may attend hearing

Supervisor	Supports fact gathering and notifies Partnership Director, may attend hearing
Partnership Director	Digs deeper into issue and escalates to leadership, sends written notice to operator, attends hearing
SOK leadership (CEO, COO)	Determines course of action, attends hearing
Service Oklahoma Operator Board	Determines whether hearing is warranted, holds hearing
Legal Department	Attends hearing, consults as needed
Licensed Operator	Takes action to rectify issue, makes case at hearing

Procedures

1. When a Service Oklahoma employee learns of an issue with a Licensed Operator, whether it's a financial reporting issue, a customer service issue, or another type of complaint, the first step is for the employee that identifies the issue to gather as much information as possible, consulting their supervisor as necessary. An email should be sent to SOK General Counsel with the following information:
    a. Name of the Licensed Operator
    b. Names of any Licensed Operator employees involved
    c. Names of any SOK employees involved
    d. Any relevant customer information (name, contact, history, complaint, behavior)
    e. Basis of the complaint (policy, statute, or regulation violated)
    f. Facts of the situation (date, time, order of events)
    g. Any additional context (personal or political factors, previous situations)
2. Once the identifying employee documents the facts in the email and their supervisor reviews it, the supervisor notifies the Partnership Director, who asks additional questions to confirm the details of the situation.
3. If the Partnership Director decides the issue can be resolved with informal action, such as a phone call, they reach out to the Licensed Operator directly. This typically applies to issues that do not involve contract violations and minor first-time offenses. If the Partnership Director believes the issue warrants escalation, they bring it to SOK leadership (CEO, COO), who determines the appropriate course of action. In most cases, SOK leadership asks the Partnership Director to send a written notice to the Licensed Operator via mail or email to give them an opportunity to resolve the issue. SOK leadership may also decide to de-escalate the situation internally. In certain circumstances, Oklahoma law provides for the immediate suspension of the Licensed Operator's license pending the SOK Operator Board's review (*see OAC 670:10-11-4 for additional details*).
4. After the Partnership Director notifies the Licensed Operator of the issue raised and the policy it violates, the Licensed Operator is given a fixed amount of time to reconcile the issue, typically 30 days.
5. As issues arise, a folder is created for the Licensed Operator in the shared folder for the Partnerships team. If the issue is addressed in the allotted time, the Partnership Director documents the situation for future reference in the folder and the process is complete. If not, the Partnership Director notifies the SOK Operator Board, who determines the appropriate next step. If the SOK Operator Board chooses to hold a hearing, the Licensed Operator appears in front of the Board and the involved department leaders to share their point of view and clarify points of confusion or conflict. The identifying employee and their supervisor may be asked to attend to provide additional context.
6. At the conclusion of the hearing, the Service Oklahoma Operator Board makes a final decision on the outcome of the issue escalation. The SOK Operator Board has the sole discretion to act on the Licensed Operator's license. They may suspend or revoke the license or take alternative action in accordance with Oklahoma law (*see 47 O.S. 1140 for additional details*).

References

Compliance

1. Oklahoma Statutes §47-1140 (2022)