

Tecumseh Local School District IRN 046243
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**Ohio Department of Education, Office for Exceptional Children
2012-2013 Onsite Review Summary Report**

Introduction

The Ohio Department of Education's Office for Exceptional Children would like to extend appreciation to the Tecumseh Local School District staff for their efforts, attention and time committed to the completion of the review processes.

The following report is a summary of the onsite review conducted on November 13-15, 2012 by the Ohio Department of Education's Office for Exceptional Children (OEC) and Office of Early Learning and School Readiness (OEL&SR) as part of its general supervision requirements under the Individuals with Disabilities Education Act (IDEA) and Am. Sub. HB1. The onsite visit consisted of the following reviews:

- IDEA Review (Special Education School Age, Special Education Early Childhood and Fiscal)
- Gifted Education Review

IDEA Review

Overview

Educational consultants from the Office for Exceptional Children (OEC) conducted IDEA review activities on November 13-15, 2012. During the IDEA Review, OEC consultants monitor the LEA's implementation of IDEA to ensure compliance. The primary focus of the IDEA Review is to:

- Improve educational results and functional outcomes for all children with disabilities; and
- Ensure that LEAs meet program requirements under Part B of IDEA, particularly those requirements that are most closely related to improving educational results for children with disabilities.

OEC focused the review on the following areas:

- Child Find;
- Delivery of Services;
- Least Restrictive Environment;
- Discipline

Note: Data Verification was not reviewed for this district due to incomplete statewide availability of EMIS data.

Data Sources

During the review, OEC considered information from the following sources:

1. Public Parent Meeting, Individual Parent Meetings and Written Comments

On October 1, 2012, Tecumseh Local School District mailed 425 OEC approved letters to all families with students with disabilities in the district. OEC provided the district with a public meeting announcement for inclusion on its website or newsletter. The district posted the information regarding the meeting on the school website.

On November 13, 2012, OEC consultants held a public meeting for parents and other interested parties. Public parent meeting dates for all districts selected for IDEA Reviews are posted on the ODE website. Two parents and family members and two State Support Team (SST) Region 10 representatives attended the public meeting. Attendees could speak to OEC representatives publicly in the meeting or

individually, provide written comments, or both. Two attendees made comments during the public meeting. Written comment forms were available before, during and after the meeting. OEC did not receive any written comments.

During the public meeting, parents were advised by OEC consultants of the formal complaint process under IDEA and that their public comments did not constitute a formal complaint. The participants were also informed that while the information they provided may be helpful to the review, it may not necessarily be acted upon as part of the review process. "Whose IDEA Is This?", Ohio's procedural safeguards notice, was available for participants who wanted a copy.

2. Pre-Onsite Data Analysis

OEC and SST consultants reviewed district, building and grade level data. District data analyzed included the Special Education Performance Profile, Local Report Cards, and Education Management Information System (EMIS) data. The data analysis assists OEC in determining potential growth areas and district strengths.

3. Record Review

On November 13-14, 2012, OEC consultants reviewed 41 records of school age students with disabilities. An OEL&SR consultant, on November 15 2012, reviewed six records as part of the Early Childhood Special Education Review. OEC selected records of a variety of children with disabilities from five buildings.

Please note, not all records are reviewed for every component.

4. Staff/Administrative Interviews

On November 14, 2012, OEC consultants held one session of interviews with 12 administrators including three school psychologists. On November 15, 2012 OEC consultants held three sessions of interviews with 19 teachers, and four related services personnel. Interviews focused on the following review areas: Child Find; Delivery of Services; Least Restrictive Environment (LRE) and IEP alignment; and Discipline.

Findings

A finding is made when noncompliance with a specific IDEA requirement is identified through the processes outlined above. All findings of noncompliance must be corrected as soon as possible, but no later than one year from the date of this report.

OEC provides separate written correspondence to the school district and the parent/guardian when action is required to correct findings of non-compliance for individual students.

Noncompliance that is identified in **30% or more** of the records reviewed by OEC and substantiated through other data sources must be included in a comprehensive corrective action plan (CAP) with action steps to address each of the noncompliance findings.

All noncompliance identified by OEC as part of the IDEA review, listed by subject area within this report in the *Review of Findings and District Required Actions* table, must be corrected as set forth below.

Corrective Action Plan (CAP)

The *Review of Findings and District Required Actions* identifies the noncompliance which must be addressed in the corrective action plan developed by the Tecumseh Local School District. An approved form for the corrective action plan will be provided by OEC or can be accessed on ODE's web site by using the keyword search "OEC Corrective Action Plan". The corrective action plan developed by the district must include the following:

- Improvement strategies to address all areas of identified non-compliance,
- Documentation/evidence of implementation of the strategies,
- Individuals responsible for implementing the strategies,
- Resources needed, and
- Completion dates.

State Performance Plan (SPP) results indicators may also be included in the corrective action plan to address improved performance for students with disabilities.

The district must submit the corrective action plan to Susan Rieger, OEC Lead Consultant at susan.rieger@education.ohio.gov within 30 school days from the date of this report. OEC will review the action plan submitted by the district for approval. If OEC deems that a revision(s) is necessary, the district will be required to revise and resubmit. The district will be contacted by the OEC Lead Consultant and notified when the action plan has been approved.

CAP Due Date: February 21, 2013

Individual Correction

The district has 60 school days of the issuance of the letter of findings to correct all identified findings of non-compliance for individual students, unless noted otherwise in the report.

Individual Correction Due Date: April 12, 2013

Systemic Correction

The district must correct any noncompliant policies, procedures and/or practices identified through the onsite review. OEC will verify through follow-up review of new data that the noncompliant policies, procedures and/or practices have been revised and the district is correctly implementing the regulatory requirements of IDEA. The follow-up review of new data will include review of individual student records and may include parent/staff/administrative interviews, as needed.

Systemic Correction Due Date: January 3, 2014

For questions about specific components of this report please contact:

- **Special Education School Age:** Susan Rieger, OEC Lead Consultant, at (614) 995-9935, toll-free at (877) 644-6338, or by e-mail at susan.rieger@education.ohio.gov.
- **Special Education Early Childhood:** Connie Prairie, Educational Consultant, at (614) 995-9934, toll-free at (877) 644-6338, or by e-mail at connie.prairie@education.ohio.gov.
- **Fiscal:** Tom Main, Educational Consultant, at (614) 387-0156, toll-free at (877) 644-6338, or by e-mail at tom.main@education.ohio.gov.
- **Gifted Education:** Rosemary Pearson, Educational Consultant, at (614) 644-2641, toll-free at (877) 644-6338, or by e-mail at rosemary.parson@education.ohio.gov.

Special Education School Age/Preschool Components, OEC's Review Findings, and District Required Actions

Component 1: Child Find

Each school district shall adopt and implement written policies and procedures approved by the Ohio Department of Education, Office for Exceptional Children, that ensure all children with disabilities residing within the district, regardless of the severity of their disability, and who are in need of special education and related services are identified, located, and evaluated as required by the Individuals with Disabilities Education Improvement Act of 2004 and Federal Regulations at 34 C.F.R. Part 300 pertaining to child find, including the regulations at 34 C.F.R. 300.111 and 300.646 and Rule 3301-51-03 of the Operating Standards for Ohio Educational Agencies serving Children with Disabilities.

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
CF-1	300.303(b)(2)	<u>Record Review</u> All reevaluation records indicated that the child's reevaluation was completed within the three year timeline.	<u>Individual Correction</u> None <u>Systemic Correction</u> None	<input checked="" type="checkbox"/> NA
CF-2	300.305(a)	<u>Record Review</u> All preschool evaluation records of children transitioning from Part C, utilized child information from the Individual Family Service Plan (IFSP) and other documentation provided by Help Me Grow in suspecting or when determining eligibility for Part B supports and services.	<u>Individual Correction</u> None <u>Systemic Correction</u> None	<input checked="" type="checkbox"/> NA

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
CF-3	OAC 3301-51-06 (2) and OAC 3301-51-06(4)	<p><u>Record Review</u></p> <p>Two school age initial evaluations did not appropriately document interventions provided to resolve concerns for the child performing below grade-level standards.</p> <p><u>Interviews</u></p> <p>Teachers and administrators indicated that each building has an intervention support team that meets regularly to make sure interventions are in place and progress monitoring and adjustments are implemented.</p>	<p><u>Individual Correction</u></p> <p>OEC has verified that the two students have a current IEP in place, so no additional individual correction is required.</p> <p><u>Systemic Correction</u></p> <p>The district must submit evidence to OEC of written procedures and practices in place regarding documentation of intervention and supports provided prior to completion of the initial evaluation team report.</p> <p>OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.</p>	<input checked="" type="checkbox"/> Yes A Corrective Action Plan is required due to meeting the 30% threshold of non-compliance.
CF-4	300.501(b)(1)	<p><u>Record Review</u></p> <p>Three school age student records did not show evidence that the evaluation planning team included the parent.</p> <p>All preschool student records showed evidence that the evaluation planning team included the parent.</p> <p><u>Interviews</u></p> <p>District staff identified various strategies utilized to involve parents. However, evidence indicated that didn't occur in every instance related to planning for the evaluation. School psychologists were completing the evaluation planning form at the time of the ETR review.</p>	<p><u>Individual Correction</u></p> <p>The district must provide evidence that the parent was involved or provided the opportunity to participate (three documented attempts) in the evaluation planning process.</p> <p>The evidence may include evaluation planning form, prior written notice, parent invitation, referral form or communication log.</p> <p>If the district cannot provide documentation that the parent was involved or provided the opportunity to participate in the evaluation planning process, the district must conduct evaluation planning with the parent or the district will provide evidence of the parent's involvement or opportunity to participate.</p> <p><u>Systemic Correction</u></p> <p>OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.</p>	<input checked="" type="checkbox"/> No The district does <u>not</u> need to address this finding in a Corrective Action Plan.

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
CF-5	300.305(a)(1)	<p><u>Record Review</u></p> <p>All school age and preschool student evaluations provided evidence that the evaluation planning team reviewed existing data on the child.</p>	<p><u>Individual Correction</u></p> <p>None</p> <p><u>Systemic Correction</u></p> <p>None</p>	<input checked="" type="checkbox"/> NA
CF-6	300.305(a)(2)	<p><u>Record Review</u></p> <p>Three school age student evaluations did not provide evidence that the evaluation planning team identified what additional data, if any, were needed.</p> <p>All preschool student evaluation provided evidence that the evaluation planning team identified what additional data, if any, were needed.</p>	<p><u>Individual Correction</u></p> <p>The district must provide the evaluation planning form or evidence documenting additional data, if any was reviewed during the evaluation planning process. If not, the IEP team must reconvene and complete the ETR planning form and conduct an ETR meeting.</p> <p><u>Systemic Correction</u></p> <p>OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.</p>	<input checked="" type="checkbox"/> No <p>The district does <u>not</u> need to address this finding in a Corrective Action Plan.</p>
CF-7	300.304(c)(4); OAC 3301-51-01; and OAC 3301-51-06	<p><u>Record Review</u></p> <p>One school age student evaluation did not provide evidence that the evaluation addresses all areas related to the suspected disability.</p> <p>All preschool student evaluations provided evidence that the evaluation addressed all areas related to the suspected disability.</p>	<p><u>Individual Correction</u></p> <p>The district will convene the ETR team to conduct a reevaluation and provide evidence that the evaluation addresses all areas related to the suspected disability.</p> <p><u>Systemic Correction</u></p> <p>OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.</p>	<input checked="" type="checkbox"/> No <p>The district does <u>not</u> need to address this finding in a Corrective Action Plan.</p>

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction		Must be addressed in CAP
			Required Actions		
CF-8	300.306(a)(1)	<p><u>Record Review</u></p> <p>One school age student record did not show evidence that the parent of the child was involved in determining whether the child is a child with a disability.</p> <p>All preschool student records showed evidence that the parent of the child was involved in determining whether the child is a child with a disability.</p>	<p><u>Individual Correction</u></p> <p>The district must provide evidence that the parent was involved in determining whether the child is a child with a disability or evidence that the parent was provided the opportunity to participate in the eligibility determination as evidenced by three attempts to contact the parent. If not, the IEP team must reconvene the ETR meeting and provide OEC evidence of parent involvement.</p> <p><u>Systemic Correction</u></p> <p>OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.</p>	<p><input checked="" type="checkbox"/> No</p> <p>The district does <u>not</u> need to address this finding in a Corrective Action Plan.</p>	
CF-9	300.306(a)(1)	<p><u>Record Review</u></p> <p>All school age and preschool student initial evaluations showed evidence that a group of qualified professionals as appropriate to the suspected disability were involved in determining whether the child is a child with a disability.</p>	<p><u>Individual Correction</u></p> <p>None</p> <p><u>Systemic Correction</u></p> <p>None</p>	<p><input checked="" type="checkbox"/> NA</p>	

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
CF-10	300.306(a)(1); 300.305(a); and 3301-51-01 (B)(21)	<u>Record Review</u> Two school age reevaluations and two preschool student evaluations did not show evidence that a group of qualified professionals as appropriate to the suspected disability were involved in determining whether the child is a child with a disability.	<u>Individual Correction</u> The district must provide evidence that the IEP team and other qualified professionals participated in the eligibility determination. If not, the IEP team must reconvene the ETR meeting and provide OEC evidence of group participation. IEP Team Members include, but are not limited to: <ol style="list-style-type: none"> 1. Parent 2. Regular Education Teacher 3. Special Education Provider 4. District Representative 5. An individual who can interpret the instructional implications of evaluation results, 6. At the discretion of the parent or school district, other individuals who have knowledge or special expertise regarding the child, including related services personnel as appropriate; 7. Whenever appropriate, the child with a disability. <u>Systemic Correction</u> OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.	<input checked="" type="checkbox"/> No The district does <u>not</u> need to address this finding in a Corrective Action Plan.

Component 2: Delivery of Services

Each school district shall have policies, procedures and practices to ensure that each child with a disability has an IEP that is developed, reviewed, and revised in a meeting and implemented in accordance with 300.320 through 300.324.

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
DS-1	300.320(a)(1)(i)	<p><u>Record Review</u></p> <p>Two school age student IEPs did not address how the child's disability affects his/her involvement and progress in the general education curriculum.</p> <p>All preschool student IEPs addressed how the child's disability affects his/her involvement and progress in the general education curriculum.</p>	<p><u>Individual Correction</u></p> <p>The district must reconvene the IEP teams of the two IEPs identified as noncompliant to review and amend the IEP to include a statement of how the child's disability affects the child's participation in appropriate activities to access, participate and progress in the general education curriculum.</p> <p><u>Systemic Correction</u></p> <p>OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.</p>	<p><input checked="" type="checkbox"/> No</p> <p>The district does <u>not</u> need to address this finding in a Corrective Action Plan.</p>
DS-2	300.320(a)(1)	<p><u>Record Review</u></p> <p>Thirteen (13) school age student IEPs did not contain Present Levels of Academic Achievement and Functional Performance (PLOP) that addressed the needs of the student.</p> <p>All preschool student IEPs contained Present Levels of Academic Achievement and Functional Performance (PLOP) that addressed the needs of the student.</p>	<p><u>Individual Correction</u></p> <p>The district must reconvene the IEP teams of the 13 IEPs identified as noncompliant to review and amend the PLOP related to each goal to include:</p> <ul style="list-style-type: none"> • A summary of current daily academic/behavior and/or functional performance (strengths and needs); • Baseline data provided for developing a measurable goal. • For preschool, the PLOP should relate to the child's developmental domains, functional performance and pre-academic skills. <p><u>Systemic Correction</u></p> <p>The district must submit evidence to OEC of written procedures and practices in place regarding the review of current academic/functional data when writing IEPs.</p> <p>OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.</p>	<p><input checked="" type="checkbox"/> Yes</p> <p>A Corrective Action Plan is required due to meeting the 30% threshold of non-compliance.</p>

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
DS-3	300.320 (a)(2)(i)(A)	<u>Record Review</u> All school age and preschool student IEPs contained annual goals that address the child's academic area(s) of need as required.	<u>Individual Correction</u> None <u>Systemic Correction</u> None	<input checked="" type="checkbox"/> NA
DS-4	300.320(a)(2)(i)(A)	<u>Record Review</u> All school age and all preschool student IEPs contained annual goals that address the child's functional area(s) of need as required.	<u>Individual Correction</u> None <u>Systemic Correction</u> None	<input checked="" type="checkbox"/> NA
DS-5	300.320(a)(2)(i)	<u>Record Review</u> Twelve (12) school age and five preschool student IEPs did not contain measurable annual goals.	<u>Individual Correction</u> The district must reconvene the IEP teams of the 17 IEPs identified as noncompliant to review and amend annual goals to contain the following six critical elements: <ol style="list-style-type: none"> 1. Who? 2. Will Do What? 3. To What Level or Degree? 4. Under What Conditions? 5. In What Length of Time? 6. How Will Progress Be Measured? <u>Systemic Correction</u> The district must implement new procedures to ensure that annual goals written subsequent to this report will include the following six critical elements to demonstrate correction: <ol style="list-style-type: none"> 1. Who? 2. Will Do What? 3. To What Level or Degree? 4. Under What Conditions? 5. In What Length of Time? 6. How Will Progress Be Measured? OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.	<input checked="" type="checkbox"/> Yes A Corrective Action Plan is required due to meeting the 30% threshold of non-compliance.

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
DS-6	300.320(a)(4)	<p><u>Record Review</u></p> <p>Twelve (12) school age and two preschool student IEPs did not contain a statement of specially designed instruction that addresses the needs of the child and supports annual goals.</p> <p><u>Interviews</u></p> <p>Staff members defined accommodations as specially designed instruction, such as modifying tests, providing interventions and inclusion.</p>	<p><u>Individual Correction</u></p> <p>The district must reconvene the IEP teams of the 14 IEPs identified as noncompliant to review and amend the specially designed instruction to describe the adaption of, as appropriate to the needs of the child, the content, methodology, or delivery of instruction.</p> <p><u>Systemic Correction</u></p> <p>The district must submit evidence to OEC of written procedures and practices in place regarding the IEP process of determining specially designed instruction.</p> <p>OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.</p>	<p><input checked="" type="checkbox"/> Yes</p> <p>A Corrective Action Plan is required due to meeting the 30% threshold of non-compliance.</p>
DS-7	300.320(a)(7)	<p><u>Record Review</u></p> <p>Eleven (11) school age student IEPs did not indicate the location where the specially designed instruction will be provided.</p> <p>All preschool student IEPs indicated the location where the specially designed instruction will be provided.</p>	<p><u>Individual Correction</u></p> <p>The district must reconvene the IEP teams of the 11 IEPs identified as noncompliant to review and amend the location where the specially designed instruction will be provided.</p> <p><u>Systemic Correction</u></p> <p>The district must submit evidence to OEC of written procedures and practices in place regarding the IEP process of determining the location where specially designed instruction will occur.</p> <p>OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.</p>	<p><input checked="" type="checkbox"/> No</p> <p>The district does <u>not</u> need to address this finding in a Corrective Action Plan.</p>

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
DS-8	300.320(a)(7)	<u>Record Review</u> All school age and all preschool student IEPs indicated the amount of time and frequency of the specially designed instruction.	<u>Individual Correction</u> None <u>Systemic Correction</u> None	<input checked="" type="checkbox"/> NA
DS-9	300.320(a)(4)	<u>Record Review</u> One school age student IEP did not identify related services that address the needs of the child and support the annual goals. All preschool student IEPs identified related services that address the needs of the child and support the annual goals.	<u>Individual Correction</u> The district must reconvene the IEP team of the one IEP identified as noncompliant to review and amend the IEP to include related services that were identified as needed in the IEP. <u>Systemic Correction</u> OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.	<input checked="" type="checkbox"/> No The district does <u>not</u> need to address this finding in a Corrective Action Plan.
DS-10	300.320(a)(7)	<u>Record Review</u> Three school age student IEPs did not indicate the location where the related services will be provided. All preschool student IEPs indicated the location where the related services will be provided.	<u>Individual Correction</u> The district must reconvene the IEP teams of the three IEPs identified as noncompliant to review and amend the IEP to include the location where the related services will be provided. <u>Systemic Correction</u> OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.	<input checked="" type="checkbox"/> No The district does <u>not</u> need to address this finding in a Corrective Action Plan.

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
DS-11	300.320(a)(7)	<u>Record Review</u> One school age student IEP did not indicate the amount of time and frequency of the related services to be provided. All preschool student IEPs indicated the amount of time and frequency of the related services to be provided.	<u>Individual Correction</u> The district must reconvene the IEP team of the one IEP identified as noncompliant to review and amend on the IEP the amount of time and frequency of the related services to be provided. <u>Systemic Correction</u> OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.	<input checked="" type="checkbox"/> No The district does <u>not</u> need to address this finding in a Corrective Action Plan.

Component 3: Least Restrictive Environment (LRE) and IEP Alignment

Each school district shall ensure that to the maximum extent appropriate, children with disabilities, including children in public or nonpublic institutions or other care facilities, are educated with children who are nondisabled; and that a continuum of alternative placements is available to meet the needs of children with disabilities for special education and related services.

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
LRE-1	300.324(a)(2)(v)	<u>Record Review</u> All school age and all preschool student IEPs identified assistive technology to enable the child to be involved in and make progress in the general education curriculum.	<u>Individual Correction</u> None <u>Systemic Correction</u> None	<input checked="" type="checkbox"/> NA

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
LRE-2	300.320(a)(6)(i)	<p><u>Record Review</u></p> <p>All school age student IEPs identified accommodations provided to enable the child to be involved in and make progress in the general education curriculum.</p> <p>One preschool student IEP did not identify accommodations provided to enable the child to be involved in and make progress in the general education curriculum.</p>	<p><u>Individual Correction</u></p> <p>The district must reconvene the IEP team of the one IEP identified as noncompliant to review the accommodations that would directly assist the child to access the course content without altering the amount or complexity of the information taught and include them on the IEP.</p> <p><u>Systemic Correction</u></p> <p>OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.</p>	<p><input checked="" type="checkbox"/> No</p> <p>The district does <u>not</u> need to address this finding in a Corrective Action Plan.</p>
LRE-3	300.320(a)(4)	<p><u>Record Review</u></p> <p>All school age student IEPs identified modifications to enable the child to be involved in and make progress in the general education curriculum.</p> <p>One preschool student IEP did not identify modifications to enable the child to be involved in and make progress in the general education curriculum.</p>	<p><u>Individual Correction</u></p> <p>The district must reconvene the IEP team of the one IEP identified as noncompliant to review the modifications that would alter the amount or complexity of materials or the performance expected of the child from grade level curriculum expectations and include them on the IEP.</p> <p><u>Systemic Correction</u></p> <p>OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.</p>	<p><input checked="" type="checkbox"/> No</p> <p>The district does <u>not</u> need to address this finding in a Corrective Action Plan.</p>

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
LRE-4	300.320(a)(4)	<p><u>Record Review</u></p> <p>All school age student IEPs identified supports for school personnel to enable the child to be involved in and make progress in the general education curriculum.</p> <p>Three preschool student IEPs did not identify supports for school personnel to enable the child to be involved in and make progress in the general education curriculum.</p>	<p><u>Individual Correction</u></p> <p>The district must reconvene the IEP teams of the three IEPs identified as noncompliant to review the supports for school personnel that were identified by the IEP team and define on the IEP the support, who will provide it and when the support will take place.</p> <p><u>Systemic Correction</u></p> <p>OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.</p>	<p><input checked="" type="checkbox"/> No</p> <p>The district does <u>not</u> need to address this finding in a Corrective Action Plan.</p>
LRE-5	300.320(a)(5)	<p><u>Record Review</u></p> <p>Four school age and three preschool student IEPs did not include an explanation of the extent to which the child will not participate with nondisabled children in the regular education classroom.</p>	<p><u>Individual Correction</u></p> <p>The district must reconvene the IEP teams of the seven IEPs identified as noncompliant to review and include a justification for why the child was removed from the regular education classroom.</p> <p>The justification should:</p> <ul style="list-style-type: none"> • Be based on the needs of the child, not the disability. • Reflect that the team has given adequate consideration to meeting the student's needs in the regular classroom with supplementary aids and services. • Document that the nature or severity of the disability is such that education in regular education classes, even with the use of supplementary aids and services, cannot be achieved satisfactorily. • Describe potential harmful effects to the child or others, if applicable. <p><u>Systemic Correction</u></p> <p>OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.</p>	<p><input checked="" type="checkbox"/> No</p> <p>The district does <u>not</u> need to address this finding in a Corrective Action Plan.</p>

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
LRE-6	300.321(1)	<u>Record Review</u> One school age student IEP did not indicate that the IEP Team included a parent. All preschool student IEP indicated that the IEP Team included a parent.	<u>Individual Correction</u> For the one IEP identified as noncompliant, the district must: <ul style="list-style-type: none"> • Provide evidence of parent participation at the IEP meeting, or • Provide documentation of at least three attempts made by the district to ensure parent participation, or • Reconvene the IEP team to review the IEP with the parent. <u>Systemic Correction</u> OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.	<input checked="" type="checkbox"/> No The district does <u>not</u> need to address this finding in a Corrective Action Plan.
LRE-7	300.321(2)	<u>Record Review</u> All school age and preschool student IEPs indicated that the IEP Team included a regular education teacher.	<u>Individual Correction</u> None <u>Systemic Correction</u> None	<input checked="" type="checkbox"/> NA
LRE-8	300.321(3)	<u>Record Review</u> All school age and preschool student IEPs indicated that the IEP Team included a special education teacher.	<u>Individual Correction</u> None <u>Systemic Correction</u> None	<input checked="" type="checkbox"/> NA
LRE-9	300.321(4)	<u>Record Review</u> All school age and preschool student IEPs indicated that the IEP Team included an LEA representative.	<u>Individual Correction</u> None <u>Systemic Correction</u> None	<input checked="" type="checkbox"/> NA

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
LRE-10	300.321(5)	<u>Record Review</u> All school age and preschool student IEPs indicated that the IEP Team included a person qualified to interpret the instructional implications of evaluation results.	<u>Individual Correction</u> None <u>Systemic Correction</u> None	<input checked="" type="checkbox"/> NA

Component 5: Discipline

Each school district shall ensure that if the child's behavior impedes his or her learning or the learning of others, the IEP team must specifically consider the child's behavioral needs.

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
DIS-1	300.530(e)(1)	<p><u>Record Review</u></p> <p>One student record did not show evidence that the district conducted a manifestation determination.</p> <p><u>Interviews</u></p> <p>Administrators did not realize that the required manifestation determination must be completed at the point when the decision is made to suspend the student for more than ten days.</p>	<p><u>Individual Correction</u></p> <p>The district must provide evidence that the manifestation determination was completed and if not the district must reconvene the IEP team to determine if the child's conduct was a manifestation of the child's disability and provide evidence of completion. If the behavior in question is determined to be a manifestation of the child's disability, the district will provide compensatory services commensurate with the amount of time the child was removed during the 2011-2012 school year after the disciplinary change of placement occurred. The district must amend the current IEP to reflect provision of compensatory services.</p> <p>If the behavior in question is determined to be a manifestation of the child's disability, the district must provide evidence of the functional behavioral assessment (FBA). If not, the IEP team must reconvene and provide evidence of completion of the FBA.</p> <p>In addition, if the behavior in question is determined to be a manifestation of the child's disability, the district must provide evidence of the behavioral intervention plan (BIP) as it relates to the FBA. If not, the IEP team must reconvene and provide evidence of completion of the BIP.</p> <p><u>Systemic Correction</u></p> <p>The district must submit evidence to OEC of written procedures and practices in place regarding manifestation determination process.</p> <p>OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.</p>	<p><input checked="" type="checkbox"/> Yes</p> <p>A Corrective Action Plan is required due to meeting the 30% threshold of non-compliance.</p>

Fiscal Components, OEC's Review Findings, and District Required Actions

Component 1: Statement of Accounts

The district/school has submitted its FY12 FERs for IDEA Part B and Early Childhood IDEA. The district's financial detail (FINDET) report projects to match the current year budget in the Comprehensive Continuous Improvement Plan (CCIP) by subtotalling FINDET transactions according to object codes (100, 200, 400, 500, 600 & 800) for the year to date. The year to date expenditures will be reviewed for coding accuracy. The fiscal reports are evidence that ensure that district children with disabilities have available to them a free appropriate public education (FAPE) that emphasizes special education and related services designed to meet their unique needs.

Findings Citation	Evidence	Evidence of Correction		Must be addressed in CAP
		Required Actions	Date Due	
300.202	<p>After a CCIP review the district has submitted its FY12 FERs for IDEA Part B and Early Childhood IDEA.</p> <p>Tecumseh Local Schools' treasurer provided the FY13 Fund 516 and Fund 587 FINDET to date. The report was complete and accurate. The amounts documented in the FINDET were in alignment with the FY13 budget in the CCIP.</p> <p>The district had utilized most of its Fund 516 amounts in Object Code 100, 200, 400, and 500. There was an allocation in the 600s but there were not any expenditures for capital outlay year to date.</p> <p>The FY13 Early Childhood allocation (Fund 587) was reviewed. These were all payroll expenditures. They are in a consortium with Clark County ESC.</p>	<p><u>Individual Correction</u></p> <p>None</p> <p><u>Systemic Correction</u></p> <p>None</p>		<input checked="" type="checkbox"/> NA

Component 2: Payroll Expenditures

The district/school is able to document that the 516 and 587 funds were expended in FY13 for an appropriate purpose; payroll expenditures are supported by Personal Activity Reports (PAR) showing the Time and Effort or Semi-Annual Certification; expense were properly coded to the correct function and object code; all staff in certified positions have appropriate licensure; all funded positions have position descriptions; district's ACCRPTs and budget are in agreement.

Findings Citation	Evidence	Evidence of Correction		Must be addressed in CAP
		Required Actions	Date Due	
300.202	<p>The district provided documentation from FY12 that substantiated their appropriate use of to show Time and Effort as well as Semi-Annual Certification when appropriate.</p> <p>In FY13, Semi- Annual Certification were not yet due. The district did not have any split funded employees requiring a PAR.</p> <p>Twelve (12) employees were reviewed for proper function and object coding. Of these 12, there were three suggestions made regarding coding. The School Psychology services were coded 2143 Psychological Counseling Services. The Psychologists spend 90% of their time testing and 10% counseling. It was suggested that 2142 testing services be charged 90% of the time and 2143 10% to more accurately indicate the duties performed.</p> <p>There were two aides paid with 587 funds. They were coded with a 2414. It was suggested they be coded with a special education code 2416. The district and ESC agreed to all the suggestions made and provided evidence of those corrections at the time of the review.</p> <p>All staff in certified positions had appropriate licensure except for one. The Special Education Supervisor did not have a Principals Certification at the time of the review. The certification was pending with ODE. The job description did include supervision of personnel.</p>	<p><u>Individual Correction</u></p> <p>The district corrected the coding at the time of the review. It also provided copies of application for appropriate licensure for the Special Education Supervisor.</p> <p>Please provide copies of the license as soon as it is issued by ODE. The license will begin July 1, 2012 resulting in the district being in compliance.</p> <p><u>Systemic Correction</u></p> <p>None</p>		<input checked="" type="checkbox"/> No

Component 3: Non-Payroll Expenditures

The district/school is able to document that the 516 and 587 funds that were expended in FY13 for an appropriate purpose and reasonable for the program; that fiscal coding is appropriate and the funds were charged to the proper fund, function and object; that the district is able to document the expenditure with a purchase order, receipt statement or invoice.

Findings Citation	Evidence	Evidence of Correction		Must be addressed in CAP
		Required Actions	Date Due	
300.202	<p>Very little expenditure had occurred by the time of the review. The district was able to document that the 516 and funds that were expended in FY13 were for an appropriate purpose and reasonable for the program; that fiscal coding is appropriate and the funds were charged to the proper fund, function and object; that the district is able to document the expenditure with a purchase order, receipt, statement or invoice.</p> <p>There were no non-payroll expenditures for 587 funds.</p>	<p><u>Individual Correction</u> None</p> <p><u>Systemic Correction</u> None</p>		<input checked="" type="checkbox"/> NA

Component 4: Use of funds for Capital Outlay and equipment purchase

If the district/school expended FY13 516 and 587 funds for Capital Outlay and/or equipment, the district/school evidences that it has followed the board adopted procurement policy. The district must ensure that equipment and supplies placed in the non-public school are used for IDEA purposes only and can be removed from the non-public school without remodeling the school facility.

Findings Citation	Evidence	Evidence of Correction		Must be addressed in CAP
		Required Actions	Date Due	
300.202	<p>The district had not expended any funds for Capital Outlay in FY13.</p>	<p><u>Individual Correction</u> None</p> <p><u>Systemic Correction</u> None</p>		<input checked="" type="checkbox"/> NA

Component 5: Equipment inventory policy and procedures

The district/school retains control and administration of FY13 516 and 587 funds used to purchase materials, equipment and property (i.e. bus) purchased with those funds for the uses and purposes provided in the IDEA. The district is properly identifying equipment purchased with IDEA funds and is complying with Board Policy in cataloguing and inventorying the equipment. The district master list of equipment purchased with IDEA funds was updated within the last two years; the district has an equipment disposal policy; the district requested disposition instructions from ODE prior to disposing of assets with at fair market value of more than \$5,000.00, and sale proceeds were deposited back into the original grant.

Findings Citation	Evidence	Evidence of Correction		Must be addressed in CAP
		Required Actions	Date Due	
300.202	<p>Tecumseh Local Schools provided a copy of its Purchasing Policy, Inventory Policy and Disposal Policy. Policies are being followed. The district also provided a copy of its Inventory List. The Inventory List was comprehensive and complete and contained all required item detail.</p> <p>The district follows its policy to review the inventory list. The list had 97 items on it and 28 were located without any issues. From the inventory list we reviewed, 1 of the 29 items had been moved to another school because it was incompatible with newer technology being installed. The 1 item which was outdated is a 2004 Hard Drive that currently does not have a material value.</p> <p>Included with the Disposal Policy, the district provided samples of the forms which building staff are required to submit and have approved to have items of no further use or value removed from the District Inventory List.</p> <p>The district demonstrated its conscientious effort to maintain detailed records of its inventory and to responsibly oversee items purchased with public funds.</p>	<p><u>Individual Correction</u></p> <p>The district is required to follow their policy and update its inventory list. The district needs to remove the item in question from the inventory or update the location of said item. The item does not have a material value.</p> <p><u>Systemic Correction</u></p> <p>None</p>		<input checked="" type="checkbox"/> No

Component 6: Non-Public Count and Proportionate Share

The district provides **child find** and ensures equitable participation. The district maintains in its records and provides to the SEA the following information related to parentally-placed private school children covered under 34 CFR 300.130 through 300.144: the number of children evaluated; the number of children determined to be children with disabilities; and the number of children served.

The district has timely and meaningful consultation with representatives of parentally-placed private school children with disabilities (consistent with 34 CFR 300.134); conducts a thorough and complete child find process to determine the number of parentally-placed private school children with disabilities attending private schools located in the school district.

Findings Citation	Evidence	Evidence of Correction		Must be addressed in CAP
		Required Actions	Date Due	
300.130 through 300.144	<p>Tecumseh Local Schools met in a timely manner with the non-public per the NS3. As of the date of the review, no students had been tested or identified.</p> <p>Two students are served with ISPs.</p> <p>Funds are used in non-public schools to meet the needs of the identified special education students.</p>	<p><u>Individual Correction</u></p> <p>None</p> <p><u>Systemic Correction</u></p> <p>None</p>		<input checked="" type="checkbox"/> NA

Component 7: Notification of Public Participation

In accordance with 34 CFR 300.165, the district/school provided a public hearing, adequate notice of the hearings and an opportunity for comment available to the general public including individuals with disabilities and parents of children with disabilities in planning the use of IDEA Part B funds.

Findings Citation	Evidence	Evidence of Correction		Must be addressed in CAP
		Required Actions	Date Due	
300.165 and Part 300.201	<p>Tecumseh Local Schools provided notice that input could be provided regarding the use of IDEA funds. The initial communication did not include a meeting. At the time of the review, the district had not had a meeting.</p> <p>During the time of the review, the district had provided public notice of a meeting. The district also had an agenda to the meeting.</p>	<p><u>Individual Correction</u></p> <p>None</p> <p><u>Systemic Correction</u></p> <p>None</p>		<input checked="" type="checkbox"/> NA

Component 8: Redirection of funds

If the district/school has redirected funds for Comprehensive Early Intervening Services (CEIS), it is able to document the expenditures related to CEIS and to validate that the percent of the IDEA funds used for CEIS is 15% (or less if voluntary) of total allocation, to document the number of students who were served and are able to track and report on the number of students who subsequently received special education services. The district has developed a means through which to track the expenditure of Part B funds for CEIS in its financial system and is able to create a report showing the expenditure of funds for CEIS. The district has a plan in place to utilize the funds for CEIS.

If the district/school reduced its local expenditure, it was by no more than ½ of its additional allocation amount and the district can document the expenditures/reduction and the amount is shown in the CCIP.

Findings Citation	Evidence	Evidence of Correction		Must be addressed in CAP
		Required Actions	Date Due	
300.205	Tecumseh Local Schools did not budget funds for the purpose of reduction of local expenditures or for Comprehensive Early Intervening Services in FY13. There was not information to review in this section.	<u>Individual Correction</u> None <u>Systemic Correction</u> None		<input checked="" type="checkbox"/> NA

Gifted Components, OEC’s Review Findings, and District Required Actions

Component 1: Gifted Budget

- A. *Based on Section 267.30.50 in Am. Sub. HB 153, did the district spend for services to identified gifted students at least the same amount of state funding that it received in fiscal year 2009 through unit funding?*
- B. *If the district in fiscal year 2009 received gifted student services from an ESC, and the ESC received gifted unit funding in fiscal year 2009, did the district either (a) obtain gifted student services from an ESC that are comparable to the gifted student services provided to the district with gifted unit funding in fiscal year 2009 by an ESC or (b) spend for services to identified gifted students an amount not less than the amount of gifted unit funding expended by an ESC in fiscal year 2009 for the district's students?*
- C. *Did the district spend no less than their FY09 supplemental identification amount on gifted identification?*

Citation	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
		Required Actions	
Section 267.30.50, Am. Sub. HB 153	<p>Evidence was provided to demonstrate that fiscal year 2012 gifted spending was equal to or more than fiscal year 2009 unit funding. The district currently employs two full time gifted intervention specialists whose total salaries exceed the MOE requirement of \$73,062.14.</p> <p>OEC reviewed expenditure reports and determined that the district spent the required amount on gifted identification.</p>	<p><u>Individual Correction</u></p> <p>None</p> <p><u>Systemic Correction</u></p> <p>None</p>	<input checked="" type="checkbox"/> NA

Component 2: Gifted Identification

Per Ohio Revised Code 3324.04(B)(2), how does the district assure inclusion in screening and assessment procedures for minority and disadvantaged students, children with disabilities and children for whom English is a second language?

Citation	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
		Required Actions	
ORC 3324.04(B)(2)	OEC reviewed identification procedures. The district provided evidence to document that there are provisions in place to insure inclusion in screening and assessment procedures for minority and disadvantaged students, children with disabilities and children for whom English is a second language. The district conducts whole grade screening of second grade students.	<u>Individual Correction</u> None <u>Systemic Correction</u> None	<input checked="" type="checkbox"/> NA

Component 3: Roster and Written Education Plans and Attestation

Per Ohio Administrative Code 3301-51-15 (D)(4), does the district have a current written education plan (WEP) for each student reported as served? Does each WEP include the following components?

- *Goals for the students for each service to be provided;*
- *Specified methods for evaluating progress toward goals;*
- *Method and schedule for reporting progress to parents;*
- *Staff responsible for ensuring delivery of each service prescribed;*
- *Policies regarding waiver of assignments and rescheduling of tests;*
- *Deadline for next review of WEP; and*
- *Copy of WEP to parents and staff responsible for providing service listed?*

Citation	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
		Required Actions	
OAC 3301-51-15(D)(4)	WEPs for nine students were provided and reviewed. One student declined services so he did not have a WEP. All required attributes were present on all WEPs.	<u>Individual Correction</u> None <u>Systemic Correction</u> None	<input checked="" type="checkbox"/> NA

Component 4: Equitable Services and Attestation

Are all district students who meet the written criteria for a gifted service provided an equal opportunity to receive that service? Each gifted service offered in the district must be available to all eligible students in each building in the district at that grade level.

Citation	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
		Required Actions	
ORC 3324.06(D)	Each gifted service offered in the district is available to all eligible students in the district at that grade level. All services are in grades 6--8; all eligible students are together in the middle school.	<u>Individual Correction</u> None <u>Systemic Correction</u> None	<input checked="" type="checkbox"/> NA

Component 5: Acceleration and Attestation

Did the district provide evidence that they are implementing their acceleration policy?

Citation	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
		Required Actions	
ORC 3324.10	The district provided evidence that they are implementing their acceleration policy. OEC reviewed district acceleration policies and procedures. OEC reviewed acceleration information available in the district gifted brochure and on the district's website. Evidence was provided to document the district is meeting this requirement.	<u>Individual Correction</u> None <u>Systemic Correction</u> None	<input checked="" type="checkbox"/> NA

Component 6: Gifted Intervention Specialists and Attestation

Do gifted intervention specialists (GIS) spend at least 75 percent of their time providing instruction directly to gifted students? Is the remainder of their time spent on other duties related to gifted education?

Citation	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
		Required Actions	
OAC 3301-51-15(E)(2)	Schedules for the two gifted intervention specialists were reviewed. Each specialist spends at least 75 percent of the time providing instruction directly to gifted students. The remainder of the time is spent on other duties related to gifted education.	<u>Individual Correction</u> None <u>Systemic Correction</u> None	<input checked="" type="checkbox"/> NA

Component 7: Requirement for Minutes of Service Attestation

Are all students receiving service from a GIS receiving at least 225 minutes of instruction per week (kindergarten through grade 5) or 240 minutes of instruction per week (grades 6-12) from the GIS?

Citation	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
		Required Actions	
OAC 3301-51-15(E)	Students in the language arts service have a double period each day. Students receiving service in science and social studies are served five minutes short of the required time because of the school's bell schedule. An approved class time waiver is on file so no corrective action is required.	<u>Individual Correction</u> None <u>Systemic Correction</u> None	<input checked="" type="checkbox"/> NA

Component 8: Licensure

Do all staff members assigned as gifted coordinators or GIS have gifted licensure, gifted endorsement or a gifted supplemental license?

Citation	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
		Required Actions	
OAC 3301-51-15(E)(3), OAC 3301-51-15(E)(6)	Licenses were reviewed. Both gifted intervention specialists hold the appropriate licensure or endorsement.	<u>Individual Correction</u> None <u>Systemic Correction</u> None	<input checked="" type="checkbox"/> NA

Component 9: Requirement for Regular Education Teacher Professional Development and Attestation

Are all general education teachers providing gifted services receiving professional development in teaching gifted students and ongoing assistance with curriculum development and instruction from a gifted specialist and is curriculum related to gifted services differentiated?

Citation	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
		Required Actions	
OAC 3301-51-15(D)(3)(b)(i)	The district does not report any services by general education teachers so no professional development or support is required.	<u>Individual Correction</u> None <u>Systemic Correction</u> None	<input checked="" type="checkbox"/> NA