

2/6/2013

TRECA Digital Academy 143305

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 TRECA Digital Academy 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 December 10-12, 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 and Fiscal)

IDEA Review

Overview

Educational consultants from the Office for Exceptional Children (OEC) conducted IDEA review activities on December 10-12, 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;
- Data Verification

Data Sources

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

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

On November 20, 2012, TRECA Digital Academy School District mailed 332 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 date on the school website.

On Monday, December 10, 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. Five parents and family members and one State Support Team (SST) Region 7 representative attended the public meeting. Attendees could speak to OEC representatives publicly in the meeting or individually, provide written comments, or both. Five attendees, including one student, 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 December 10 and 11, 2012, OEC consultants reviewed 41 records of school age students with disabilities. OEC selected records of a variety of children with disabilities from all areas of the state.

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

4. Staff/Administrative Interviews

On Wednesday, December 12, 2012, OEC consultants held three sessions of interviews with seven administrators and 13 teachers, one related services personnel and one school psychologists. OEC interviews focused on the following review areas: Child Find; Delivery of Services; Least Restrictive Environment (LRE) and IEP alignment.

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.

FAPE Finding

The LEA was notified of a FAPE finding in a letter dated February 5, 2013. The district must submit a compliant IEP and ETR for the one student to OEC within 15 school days from the date of the letter.

The district must submit a corrective action plan by *March 21, 2013*, indicating how it will ensure compliance with the requirements of (OAC) 3301-51-09(H) (1), OAC 3301-24, (ORC) Chapter 3323 for students identified with a disability attending your district.

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 TRECA Digital Academy. 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: March 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: May 3, 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: February 5, 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
- **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

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

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	Regulation 34		Evidence of Correction	Must be
Review Item	CFR or OAC	Evidence of Findings	Required Actions	addressed in CAP
CF-1	300.303(b)(2)	Record Review	Individual Correction	⊠ No
		Five reevaluation records indicated that the child's reevaluation was not completed within the three year timeline.	OEC has verified that these students have a current ETR in place, so no additional individual correction is required. Systemic Correction	The district does not need to address this finding in a Corrective Action Plan.
			OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.	
CF-2	300.305(a)	Record Review The district does not serve nor enroll preschool students.	Individual Correction NA	⊠ NA
			Systemic Correction NA	

Record	Regulation 34		Evidence of Correction	Must be
Review Item	CFR or OAC	Evidence of Findings	Required Actions	addressed in CAP
CF-3	OAC 3301-51-06 (2) and OAC 3301-51- 06(4)	Record Review One school age initial evaluation did not appropriately document interventions provided to resolve concerns for the child performing below grade-level standards.	Individual Correction OEC has verified that the student has a current IEP in place, so no additional individual correction is required. Systemic Correction 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. OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.	Yes A Corrective Action Plan is required due to meeting the 30% threshold of non-compliance.
CF-4	300.501(b)(1)	Record Review Five school age records did not show evidence that the evaluation planning team included the parent.	Individual Correction The district must provide evidence that the parent was involved or provided the opportunity to participate (three documented attempts) in the evaluation planning process. The evidence may include; evaluation planning form, prior written notice, parent invitation, referral form or communication log. 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. Systemic Correction OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.	No The district does not need to address this finding in a Corrective Action Plan.

Record Review	Regulation 34	Evidence of Findings	Evidence of Correction	Must be addressed in
Item	CFR or OAC	Evidence of Findings	Required Actions	CAP
CF-5	300.305(a)(1)	Record Review Six school age student evaluations did not provide evidence that the evaluation planning team reviewed existing data on the child.	Individual Correction The district must provide the evaluation planning form or evidence documenting existing data was reviewed during the evaluation planning process. If not, the IEP team must reconvene the ETR planning and ETR meeting. Systemic Correction OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.	No The district does not need to address this finding in a Corrective Action Plan.
CF-6	300.305(a)(2)	Record Review Three school age student evaluations did not provide evidence that the evaluation planning team identified what additional data, if any, were needed.	Individual Correction 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 the ETR planning and ETR meeting. Systemic Correction OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.	No The district does not need to address this finding in a Corrective Action Plan.

Record	Regulation 34		Evidence of Correction	Must be
Review Item	CED OF OAC		Required Actions	addressed in CAP
CF-7	300.304(c)(4); OAC 3301-51-01; and OAC 3301- 51-06	Record Review Six school age student evaluations did not provide evidence that the evaluation addresses all areas related to the suspected disability. Interviews Staff noted that the planning form and the observation were completed at the time the parent brought the student in for the ETR assessment. Other Considerations The disability category varied within the same student IEP and/or ETR without appropriate evidence to support the change. Example: A student was evaluated as SLD and the next ETR was identified as CD.	Individual Correction 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. Systemic Correction OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.	No The district does not need to address this finding in a Corrective Action Plan.
CF-8	300.306(a)(1)	Record Review Three school age student records did not show evidence that the parent of the child was involved in determining whether the child is a child with a disability.	Individual Correction 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. Systemic Correction OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.	No The district does not need to address this finding in a Corrective Action Plan.

Record	Demulation 24		Evidence of Correction	Must be
Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Required Actions	addressed in CAP
CF-9	300.306(a)(1)	Record Review All school age 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.	Individual Correction None Systemic Correction None	NA NA
CF-10	300.306(a)(1); 300.305(a); and 3301-51-01 (B)(21)	Record Review One school age reevaluation 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.	Individual Correction 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: 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. Systemic Correction OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.	No The district does not 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	Regulation 34		Evidence of Correction	Must be
Review Item	CFR or OAC	Evidence of Findings	Required Actions	addressed in CAP
DS-1	300.320(a)(1)(i)	Record Review Eleven (11) school age student IEPs did not address how the child's disability affects his/her involvement and progress in the general education curriculum. Interviews Staff indicated that the curriculum used is not modified to meet the struggling students' needs. They also stated that modifications only took place in the online resource room. Other Considerations Administrators were adamant that there was no social advancement at TRECA. Students must master the content at that level before moving on to the next grade level.	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.	No The district does not need to address this finding in a Corrective Action Plan.

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction Required Actions	Must be addressed in CAP
DS-2	300.320(a)(1)	Record Review 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. Other Considerations The PLOP restated the entire section of the pertinent standard even though parts of that section were not relevant to the student's present level of performance.	Individual Correction 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: • 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. Systemic Correction 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. OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.	Yes A Corrective Action Plan is required due to meeting the 30% threshold of non-compliance.
DS-3	300.320 (a)(2)(i)(A)	Record Review All school age student IEPs contained annual goals that address the child's academic area(s) of need.	Individual Correction None Systemic Correction None	⊠ NA

Record	Regulation 34		Evidence of Correction	Must be
Review Item	CFR or OAC	Evidence of Findings	Required Actions	addressed in CAP No The district does not need to address this finding in a Corrective Action Plan. Yes Sof the 13 eview and lowing six Yes A Corrective Action Plan is required due to meeting the 30% threshold of non-compliance.
DS-4	300.320(a)(2)(i) (A)	Record Review Three school age student IEPs did not contain annual goals that address the child's functional area(s) of need.	Individual Correction The district must reconvene the IEP teams of the three IEPs identified as noncompliant to review and amend the IEP to include annual goals that address the functional needs that were identified in the IEP or provide evidence that the IEP team, based on the severity of the needs of the child, decided to prioritize addressing the needs Systemic Correction OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.	The district does not need to address this finding in a Corrective
DS-5	300.320(a)(2)(i)	Record Review Thirteen (13) school age student IEPs did not contain measurable annual goals. Interviews Staff acknowledged that they were receiving training on the six elements for writing annual goals from SST 7.	Individual Correction	A Corrective Action Plan is required due to meeting the 30% threshold of

Record	Regulation 34		Evidence of Correction	Must be
Review Item	CFR or OAC	Evidence of Findings	Required Actions	addressed in CAP
DS-6	300.320(a)(4)	Record Review Thirteen (13) school age student IEPs did not contain a statement of specially designed instruction that addresses the needs of the child and supports annual goals. Interviews Staff stated that it was difficult to implement the specially designed instruction due to the 33-35 students with disabilities per intervention specialist at 7-12 and 25 students with disabilities per intervention specialist at K-6.		Yes A Corrective Action Plan is required due to meeting the 30% threshold of non-compliance.
DS-7	300.320(a)(7)	Record Review Four school age student IEPs did not indicate the location where the specially designed instruction will be provided.	Individual Correction	No The district does not need to address this finding in a Corrective Action Plan.
DS-8	300.320(a)(7)	Record Review All school age student IEPs did indicate the amount of time and frequency of the specially designed instruction.	Individual Correction None Systemic Correction None	⊠ NA

Record	Regulation 34		Evidence of Correction	Must be
Review Item	CFR or OAC	Evidence of Findings	Required Actions	addressed in CAP
DS-9	300.320(a)(4)	Record Review Seven school age student IEPs did not identify related services that address the needs of the child and support the annual goals. Other Considerations During an ETR meeting in April 2012, a student had been recommended for an OT evaluation. However, as of this onsite review, the student had not been evaluated for possible services.	Individual Correction The district must reconvene the IEP teams of the seven IEPs identified as noncompliant to review and amend the IEP to include related services that were identified as needed in the IEP. Systemic Correction The district must submit evidence to OEC of written procedures and practices in place regarding the IEP process of addressing identified related service needs. OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.	Yes A Corrective Action Plan is required due to meeting the 30% threshold of non-compliance.
DS-10	300.320(a)(7)	Record Review Two school age student IEPs did not indicate the location where the related services will be provided.	Individual Correction The district must reconvene the IEP teams of the two IEPs identified as noncompliant to review and amend the IEP to include the location where the related services will be provided. Systemic Correction OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.	No The district does not need to address this finding in a Corrective Action Plan.
DS-11	300.320(a)(7)	Record Review All school age student IEPs indicated the amount of time and frequency of the related services to be provided.	Individual Correction None Systemic Correction None	⊠ NA

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	Regulation 34	uon and related services.	Evidence of Correction	Must be
Review Item	CFR or OAC	Evidence of Findings	Required Actions	addressed in CAP
LRE-1	300.324(a)(2)(v)	Record Review	Individual Correction	⊠ NA
		All school age student IEPs identified assistive technology to enable the child to be involved in and make progress in the general education curriculum.	None Systemic Correction None	
LRE-2	300.320(a)(6)(i)	Record Review	Individual Correction	⊠ NA
		All school age student IEPs identified	None	
		accommodations provided to enable the child to be involved in and make progress in the general education curriculum.	Systemic Correction None	
LRE-3	300.320(a)(4)	Record Review Four school age student IEPs did not identify modifications to enable the child to be involved in and make progress in the general education curriculum. Interviews Staff stated that they did not write modifications on IEP; however, staff indicated that they communicate regarding students' individual needs. Other Considerations Rarely were there any modifications identified on the IEP even when it was evident that supports and services were needed.	Individual Correction The district must reconvene the IEP teams of the four IEPs 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. Systemic Correction The district must submit evidence to OEC of written procedures and practices in place regarding modifications. OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.	Yes A Corrective Action Plan is required due to meeting the 30% threshold of non-compliance.

Record	Regulation 34		Evidence of Correction	Must be
Review Item	CFR or OAC	Evidence of Findings	Required Actions	addressed in CAP
LRE-4	300.320(a)(4)	Record Review	Individual Correction	
		Three school age 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.	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. Systemic Correction	A Corrective Action Plan is required due to meeting the 30% threshold of non-compliance.
			The district must submit evidence to OEC of written procedures and practices in place regarding supports for school personnel.	
			OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.	

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction Required Actions	Must be addressed in CAP
LRE-5	300.320(a)(5)	Record Review Thirteen (13) school age 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. Interviews Staff and administrators stated that the district uses a mastery learning system for all students. Students must achieve 80% mastery at their current grade level material before moving to the next grade level. There were at least two students whose IEPs indicated that they had been in the same grade level for multiple years. Teachers indicated that a student could move on to the next level once the current learning standards had been met. Other Considerations At the public meeting, the mastery learning process was equated to a video game where you can't move to the next level until you've mastered the current one.		A Corrective Action Plan is required due to meeting the 30% threshold of non-compliance.

Record	Regulation 34		Evidence of Correction	Must be
Review Item	CFR or OAC	Evidence of Findings	Required Actions	addressed in CAP
LRE-6	300.321(1)	Record Review	Individual Correction	⊠ No
		One school age student IEP did not indicate that the IEP Team included a parent.	For the one IEP identified as noncompliant, the district must:	The district does not need to
			 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. Systemic Correction	address this finding in a Corrective Action Plan.
			OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.	
LRE-7	300.321(2)	Record Review	Individual Correction	⊠ NA
		All school age student IEPs indicated that the IEP	None	
		Team included a regular education teacher.	Systemic Correction	
			None	
LRE-8	300.321(3)	Record Review	Individual Correction	⊠ NA
		All school age student IEPs indicated that the IEP Team included a special education teacher.	None	
			Systemic Correction None	
LRE-9	300.321(4)	Record Review	Individual Correction	⊠ NA
		All school age student IEPs indicated that the IEP Team included an LEA representative.	None	
			Systemic Correction	
			None	

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction Required Actions	Must be addressed in CAP
LRE-10	300.321(5)	Record Review	Individual Correction	⊠ NA
		All school age student IEPs indicated that the IEP Team included a person qualified to interpret the	None	
		instructional implications of evaluation results.	Systemic Correction	
			None	

Additional Finding:

During the interview process with administrators and staff and from the record reviews, it was determined students must achieve 80% mastery at their current grade level curriculum before moving to the next grade level. Administrators stated that there was no social advancement at TRECA. Students must master the content at that level before moving on to the next grade level.

Regulation: ORC 3323.011(D) A statement of the special education and related services and supplementary aids and services, based on peer-reviewed research to the extent practicable, to be provided to the child, or on behalf of the child, and a statement of the program modifications or supports for school personnel that will be provided for the child so that the child may: (1) Advance appropriately toward attaining the annual goals described pursuant to division (B) of this section; 2) Be involved in and make progress in the general education curriculum and participate in extracurricular and other nonacademic activities

Required Actions:

- The district must submit evidence to OEC of written procedures and practices in place documenting the services that will be provided to children with disabilities to enable them to advance appropriately and make progress in the general education curriculum.
- OEC will contact the district for submission of additional data to verify compliance with this regulation.

This needs to be addressed in the corrective action plan.

Component 4: Data Verification

Each school district shall report timely and accurate special education event records for students with disabilities; have in effect an Individualized Education program for each child with a disability with the LEA's jurisdiction and in place on or before Dec. 1, 2009; conduct initial evaluations within 60 days of receiving parental consent for evaluation; have an IEP in place for three-year olds transitioning from Early Intervention Programs on or before the child's third birthday; and have a secondary transition place in place that meets all required elements for IDEA.

Record	Regulation 34	Est laure of Eta Para	Evidence of Correction	Must be
Review Item	CFR or OAC	Evidence of Findings	Required Actions	addressed in CAP
DV-1	300.645	Record Review	Individual Correction	⊠ NA
	R.C. 3301.07.14	All school age student IEPs indicated that the	None	
		child had an IEP in effect as reported on the LEA's December 1, 2011 Child Count Report.	Systemic Correction	
		ELAS December 1, 2011 Onna Count Report.	None	
DV-2	300.645	Record Review	Individual Correction	⊠ NA
	R.C. 3301.07.14	All school age student ETRs indicated that the	None	
		child had an ETR in effect as reported on the LEA's December 1, 2011 Child Count Report.	Systemic Correction	
DV-3	SPP Indicator 20:	<u>'</u>	None Individual Correction	⊠ No
DV-3	Accurate and	Record Review		
	Timely Reporting of Special Education Event	accurate student data reported by the LEA t	The district must provide evidence that they corrected the student data through their Student Information System (SIS).	The district does not_need to address this finding in a Corrective
	Record	Count Report, specifically in the following area(s):	Systemic Correction	Action Plan.
		a) DOB	OEC will contact the district for submission of new	
		b) IEP date (IIEP, RIEP, TIEP, CIEP, or FIEP events)	records and review these records to determine compliance with this regulation.	
		c) ETR dates (IETR, RETR, TETR)		
		d) Referral date		
		e) Consent date		
		f) Disability category as indicated as an outcome of ETR		
		g) Admission date		
		h) Withdrawal date		
		i) Non-compliance reason for ETR or IEP date		

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction Required Actions	Must be addressed in CAP
DV-4	SPP Indicator 11 300.301(c)(1)(i)	Record Review All school age student initial evaluations reported as being conducted within 60 days of the district receiving parental consent for the evaluation were conducted within the required timeline.	Individual Correction None Systemic Correction None	⊠ NA
DV-5	SPP Indicator 12 300.124	Record Review The district does not serve nor enroll preschool students	Individual Correction NA Systemic Correction NA	⊠ NA
DV-6 A/B	SPP Indicator 20 for Secondary Transition Plans	Record Review NA	Individual Correction None Systemic Correction None	⊠ NA

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 CCIP by subtotaling 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.

Finding		Evidence of Correction		Must be
s Citation	Evidence	Required Actions	Date Due	addressed in CAP
300.202	After a CCIP review the district has submitted its FY12 FERs for IDEA Part B and Early Childhood IDEA. TRECA Digital Academy treasurer provided the FY13 Fund 516 and does not have 587. The report was complete and accurate. The amounts documented in the	Individual Correction None Systemic Correction None		NA
	FINDET were in alignment with the FY13 budget in the CCIP. The district had expended 516 funds in Object Code 100, 200, and 400. No expenditures had yet been made YTD in the 500s though they had budgeted funds in this area. No funds were budgeted in the 600s. TRECA did not have an FY13 Early Childhood allocation.			

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.

Finding		Evidence of Correction		Must be
s Citation	Evidence	Required Actions	Date Due	addressed in CAP
300.202	TRECA Digital Academy provided documentation from FY12 that substantiated their appropriate use of to show Time and Effort.	Individual Correction None		NA
	In FY13 Semi- Annual Certification were not yet due. The district did not have any split funded employees requiring a PAR. They did provide examples from FY12.	Systemic Correction None		
	Eight employees were reviewed for proper function and object coding. Of these 8 there were 5 suggestions made regarding coding. All of the intervention specialists were coded as 1239 Other Handicaps K-6. The intervention specialists' salary code should reflect the grade level of the students they are instructing. Either Elementary (1230) or Secondary (1240) grades K-6 or 7-12. The code should also reflect the disability conditions of the majority of the students in the class.			
	The district corrected the coding at the time of the review. They used 1237 and 1247. Splitting expenditures between K-6 and 7-12. They also identify the majority of students served as SLD.			
	All staff in certified positions had appropriate licensure.			

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.

Finding		Evidence of Correction		Must be
s Citation	Evidence	Required Actions	Date Due	addressed in CAP
300.202	TRECA Digital Academy had very few Non-Payroll Expenditures by the time of the review. The district was able to document that the 516 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 <i>invoice</i> . There were no non-payroll expenditures for 587 funds.	Individual Correction None Systemic Correction None		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.

Finding		Evidence of Correction		Must be
s Citation	Evidence	Required Actions	Date Due	addressed in CAP
300.202	TRECA Digital Academy had not expended any funds for Capital Outlay in FY13.	Individual Correction None Systemic Correction None		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.

Finding		Evidence of Correction		Must be
s Citation	Evidence	Required Actions	Date Due	addressed in CAP
300.202	TRECA Digital Academy provided a copy of its Purchasing Policy, Inventory Policy and Disposal Policy. They had not utilized 516 funds to purchase equipment. For this reason there was no equipment to inventory.			NA

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.

F	inding		Evidence of Correction		Must be
С	s itation	Evidence	Required Actions	Date Due	addressed in CAP
th	00.130 rough 00.144	This was not applicable TRECA Digital Academy does not have any nonpublic schools.	Individual Correction None Systemic Correction None		N/A

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.

Finding		Evidence of Correction		Must be
s Citation	Evidence	Required Actions	Date Due	addressed in CAP
300.165	TRECA Digital Academy provided notice that input could	Individual Correction		NA
and Part 300.201	be provided regarding the use of IDEA funds.	None		
	During the time of the review the district had provided public notice of a meeting. The district also had an	Systemic Correction		
	agenda to the meeting.	None		

Component 8: Redirection of funds

If the district/school has redirected funds for 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.

Finding		Evidence of Correction		Must be
s Citation	Evidence	Required Actions	Date Due	addressed in CAP
300.205	TRECA Digital Academy 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.	Individual Correction None Systemic Correction None		NA