

5/25/2012 6/22/2012 Revised

Noble Local School District IRN 048900

Ohio Department of Education, Office for Exceptional Children 2011-2012 Onsite Review Summary Report

Introduction

The Ohio Department of Education's Office for Exceptional Children would like to extend appreciation to the 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 April 2–4, 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 April 2–4, 2012. During the IDEA Review, OEC consultants monitor the LEA's implementation of the 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 March 22, 2012, Noble Local School District mailed 152 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 April 2, 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. Three parents and two State Support Team Region 12 representatives attended the public meeting. Attendees could speak to OEC representatives publicly in the meeting or individually, provide written comments, or both. All attendees made comments during the public meeting. Written comment forms were available before, during and after the meeting. OEC received one written comment.

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 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 April 2-3, 2012, OEC consultants reviewed 40 records of school age students with disabilities. An OEL&SR consultant, on April 3, 2012, reviewed five records as part of the Early Childhood Special Education Review. OEC selected records of a variety of children with disabilities from three buildings.

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

4. Staff/Administrative Interviews

On April 3-4, 2012, OEC consultants held three sessions of interviews with six administrators and 27 teachers, school counselors, related services personnel and 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 of 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 Noble 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 Stephanie Falor, OEC Lead Consultant at stephanie.falor@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: 10-09-2012

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: 11-21-2012

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: 05-24-2013

For questions about specific components of this report please contact:

- **Special Education School Age:** Stephanie Falor, OEC Lead Consultant, at (614) 387-2236, toll-free at (877) 644-6338, or by e-mail at Stephanie.Falor@education.ohio.gov.
- **Special Education Early Childhood:** Barbara Weinberg, Educational Consultant, at (614) 387-2239, toll-free at (877) 644-6338, or by e-mail at Barbara.Weinberg@education.ohio.gov.
- **Fiscal:** Earl Focht, Educational Consultant, at (614) 387-0940, toll-free at (877) 644-6338, or by e-mail at Earl.Focht@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.Pearson@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 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	Regulation 34		Evidence of Correction	Must be addressed in
Item	CFR or OAC	Evidence of Findings	Required Actions	CAP
CF-1	300.303(b)(2)	Record Review Three Two school age reevaluation records indicated that the child's reevaluation was not completed within the three year timeline. All preschool reevaluation records indicated that the child's reevaluation was completed within the three year timeline.	ETR 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 child	No The district does not need to address this finding in a Corrective Action Plan.
			find evaluation process. 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 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.		⊠ 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 All school age initial evaluations appropriately documented interventions provided to resolve concerns for the child performing below grade-level standards.	Individual Correction None Systemic Correction None	⊠ NA
CF-4	300.501(b)(1)	Record Review Two school age student and three preschool student 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. Systemic Correction The district must submit evidence to OEC of written procedures and practices in place regarding the evaluation planning process to include the parent. 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 Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction Required Actions	Must be addressed in CAP
CF-5	300.305(a)(1)	Record Review Two preschool student evaluations did not provide evidence that the evaluation planning team reviewed existing data on the child. All school age student evaluations provided 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 The district must submit evidence to OEC of written procedures and practices in place to review existing data during the evaluation planning. 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 Two preschool student evaluations did not provide evidence that the evaluation planning team identified what additional data, if any, were needed. All school age student evaluations provided 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 The district must submit evidence to OEC of written procedures and practices in place to review additional data, if any during evaluation planning. 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 Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction Required Actions	Must be addressed in CAP
CF-7	300.304(c)(4); OAC 3301-51-01; and OAC 3301- 51-06	Record Review One preschool student evaluation did not provide evidence that the evaluation addresses all areas related to the suspected disability. All school age student evaluations provided evidence that the evaluation addresses all areas related to the suspected disability.	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 The district must submit evidence to OEC of written procedures and practices in place to provide evidence that the evaluation addresses all areas related to the suspected disability. 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 Two 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. 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.	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 The district must submit evidence to OEC of written procedures and practices in place regarding the evaluation planning process to include the parent. 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	gulation 34		Evidence of Correction	Must be
	FR or OAC	Evidence of Findings	Required Actions	addressed in CAP
	306(a)(1)	Record Review Two preschool student initial 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. 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 The district must provide evidence that a group of qualified professionals participated in the eligibility determination. If not, the IEP team must reconvene the ETR meeting and provide OEC evidence of group participation. A group of qualified professionals includes the following, but is not limited to: Parent Additional group members: The child's regular education teacher; or a regular classroom teacher qualified to teach a child of his or her age; or For a preschool child an individual qualified by the SEA to teach a child of his or her age; and At least one person qualified to conduct individual diagnostic examinations of children. Systemic Correction The district must submit evidence to OEC of written procedures and practices in place regarding the eligibility determination process. 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	CFR or OAC	Evidence of Findings	Required Actions	addressed in CAP
CF-10	300.306(a)(1);	Record Review	Individual Correction	⊠ No
	300.305(a); and 3301-51-01 (B)(21)	Two school age and one preschool reevaluations 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.	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.	The district does not need to address this finding in a Corrective Action Plan.
			 IEP Team Members include, but are not limited to: Parent Regular Education Teacher Special Education Provider District Representative An individual who can interpret the instructional implications of evaluation results, 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; Whenever appropriate, the child with a disability. 	
			Systemic Correction	
			The district must submit evidence to OEC of written procedures and practices in place regarding the eligibility determination process.	
			OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.	

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	Individual Correction	⊠ No
		All school age student IEPs addressed how the child's disability affects his/her involvement and progress in the general education curriculum.	The district must reconvene the IEP team of the one IEP identified as noncompliant to review and amend the IEP to include a statement of how the child's	The district does not need to address this finding in a Corrective
		One preschool student IEP did not address how the child's disability affects his/her involvement and progress in the general education curriculum.	disability affects the child's participation in appropriate activities to access, participate and progress in the general education curriculum.	Action Plan.
			Systemic Correction	
			The district must submit evidence to OEC of written procedures and practices in place regarding the involvement and progress of children with disabilities in the general education curriculum and assessing how their disability affects that involvement.	
			OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.	

Record	Regulation 34		Evidence of Correction	Must be
Review Item	CFR or OAC	Evidence of Findings	Required Actions	addressed in CAP
DS-2	300.320(a)(1)	Record Review	Individual Correction	⊠ No
		All school age student IEPs contained Present Levels of Academic Achievement and Functional Performance (PLOP) that addressed the needs of the student. One preschool student IEP did not contain Present Levels of Academic Achievement and Functional Performance (PLOP) that addressed the needs of the student.	The district must reconvene the IEP team of the one IEP 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 does not need to address this finding in a Corrective Action Plan.
			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.	
DS-3	300.320	Record Review	Individual Correction	⊠ No
	(a)(2)(i)(A)	One school age student IEP did not contain annual goals that address the child's academic area(s) of need. All preschool student IEPs contained annual goals that address the child's academic area(s) of need.	The district must reconvene the IEP team of the one IEP identified as noncompliant to review and amend the IEP to include annual goals that address the academic 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.	The district does not need to address this finding in a Corrective Action Plan.
			Systemic Correction The district must submit evidence to OEC of written procedures and practices in place regarding the IEP process of addressing identified academic needs. OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.	

Record	Regulation 34		Evidence of Correction	Must be
Review Item	CFR or OAC	Evidence of Findings	Required Actions	addressed in CAP
Review	Regulation 34 CFR or OAC 300.320(a)(2)(i) (A)	Evidence of Findings Record Review Four Three school age student IEPs did not contain annual goals that address the child's functional area(s) of need. All preschool student IEPs contained annual goals that address the child's functional area(s) of need.	Required Actions Individual Correction	Must be addressed in CAP 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	CFR or OAC	Evidence of Findings	Required Actions	addressed in CAP
DS-5	300.320(a)(2)(i)	Record Review	Individual Correction	
	300.320(a)(2)(i)	Record Review Fourteen Twelve school age and three preschool student IEPs did not contain measurable annual goals.	•	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
DS-6	300.320(a)(4)	Record Review	Individual Correction	
		Twelve school age and four preschool student IEPs did not contain a statement of specially designed instruction that addresses the needs of the child and supports annual goals.	The district must reconvene the IEP teams of the 15 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.	A Corrective Action Plan is required due to meeting the 30% threshold of non-compliance.
			Systemic Correction	
			The district must submit evidence to OEC of written procedures and practices in place regarding the IEP process of determining specially designed instruction.	
			OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.	
DS-7	300.320(a)(7)	Record Review	Individual Correction	⊠ No
		Seven school age and one preschool student IEPs did not indicate the location where the specially designed instruction will be provided.	The district must reconvene the IEP teams of the eight IEPs identified as noncompliant to review and amend the location where the specially designed instruction will be provided.	The district does not need to address this finding in a Corrective Action Plan.
			Systemic Correction	
			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.	
			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
DS-8	300.320(a)(7)	Record Review Two school age student and one preschool student IEPs did not indicate the amount of time and frequency of the specially designed instruction.	Individual Correction	No The district does not need to address this finding in a Corrective Action Plan.
DS-9	300.320(a)(4)	Record Review All school age student IEPs identified related services that address the needs of the child and support the annual goals. Two preschool student IEPs did not identify related services that address the needs of the child and support the annual goals.	records and review these records to determine compliance with this regulation. Individual Correction The district must reconvene the IEP teams of the two 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.	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-10	300.320(a)(7)	Record Review Three Two 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.	Individual Correction The district must reconvene the IEP teams of the	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 and preschool student IEPs indicated the amount of time and frequency of the related services to be provided.	Individual Correction None Systemic Correction None	NA 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		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 One school age student IEP did not identify assistive technology to enable the child to be involved in and make progress in the general education curriculum. All preschool student IEPs identified assistive technology to enable the child to be involved in and make progress in the general education curriculum.		No The district does not need to address this finding in a Corrective Action Plan.
LRE-2	300.320(a)(6)(i)	Record Review All school age and preschool IEPs identified accommodations provided to enable the child to be involved in and make progress in the general education curriculum. 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.	Individual Correction The district must reconvene the IEP team of the one	No The district does not need to address this finding in a Corrective Action Plan. NA

Record	Regulation 34		Evidence of Correction	Must be
Review Item	CFR or OAC	Evidence of Findings	Required Actions	addressed in CAP
			Systemic Correction The district must submit evidence to OEC of written procedures and practices in place regarding accommodations. OEC will contact the district for submission of new records and review these records to determine compliance with this regulation. None	
LRE-3	300.320(a)(4)	Record Review Four Three school age student IEPs did not identify modifications to enable the child to be involved in and make progress in the general education curriculum.	four three IEPs identified as noncompliant to review	No The district does not need to address this finding in a Corrective Action Plan.
LRE-4	300.320(a)(4)	Record Review 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. 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.	Individual Correction 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.	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	CFR or OAC	Evidence of Findings	Required Actions	addressed in CAP
			Systemic Correction	
			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.	
LRE-5	300.320(a)(5)	Record Review	Individual Correction	⊠ No
		Five Six school age and two 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.	The district must reconvene the IEP teams of the seven eight IEPs identified as noncompliant to review and include a justification for why the child was removed from the regular education classroom.	The district does not need to address this finding in a Corrective Action Plan.
			The justification should:	Action Flam.
			 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. Systemic Correction The district must submit evidence to OEC of written procedures and practices in place regarding least.	
			procedures and practices in place regarding least restrictive environment placement decision process. 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-6	300.321(1)	Record Review All school age and preschool student IEPs indicated that the IEP Team included a parent.	Individual Correction None Systemic Correction None	NA NA
LRE-7	300.321(2)	Record Review All school age student IEPs indicated that the IEP Team included a regular education teacher. Two preschool student IEPs did not indicate that the IEP Team included a regular education teacher.	 Individual Correction For the two IEPs identified as noncompliant, the district must: Provide documentation that the parent was informed prior to the IEP meeting that the regular education teacher would not participate in the meeting, and Provide a written excuse signed by the parents and the district that allowed the regular education teacher not to be in attendance at the IEP meeting, or Reconvene the IEP team to review the IEP will all required members present. Systemic Correction The district must submit evidence to OEC of written procedures and practices in place regarding regular education teacher involvement in the IEP process. 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 Findings	Evidence of Correction	Must be
Review Item	CFR or OAC	Evidence of Findings	Required Actions	addressed in CAP
LRE-8	300.321(3)	Record Review All school age student IEPs indicated that the IEP Team included a special education teacher. Two preschool student IEPs did not indicate that the IEP Team included a special education teacher.	Individual Correction For the two IEPs identified as noncompliant, the district must: Provide documentation that the parent was informed prior to the IEP meeting that the special education teacher would not participate in the meeting, and Provide a written excuse signed by the parents and the district that allowed the special education teacher not to be in attendance at the IEP meeting, or Reconvene the IEP team to review the IEP will all required members present. Systemic Correction The district must submit evidence to OEC of written procedures and practices in place regarding special education teacher involvement in the IEP process. 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	Pagulation 3/1		Evidence of Correction	Must be
Review Item	CFR or OAC	Evidence of Findings	Required Actions	addressed in CAP
LRE-9	300.321(4)	Record Review	Individual Correction	⊠ No
		One school age and two preschool student IEPs did not indicate that the IEP Team included an LEA representative.	For the three IEPs identified as noncompliant, the district must: Provide documentation that the parent was informed prior to the IEP meeting that the LEA representative would not participate in the meeting, and Provide a written excuse signed by the parents and the district that allowed the LEA representative not to be in attendance at the IEP meeting, or Reconvene the IEP team to review the IEP will all required members present. Systemic Correction The district must submit evidence to OEC of written procedures and practices in place regarding LEA representative involvement in the IEP process. 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 Action Plan.

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 All school age student IEPs indicated that the IEP Team included of a person qualified to interpret the instructional implications of evaluation results. One preschool student IEP did not indicate that the IEP Team included of a person qualified to interpret the instructional implications of evaluation results.	 Individual Correction For the one IEP identified as noncompliant, the district must: Provide documentation that the parent was informed prior to the IEP meeting that the person qualified to interpret the instructional implications of evaluation results would not participate in the meeting, and Provide a written excuse signed by the parents and the district that allowed the person qualified to interpret the instructional implications of evaluation results not to be in attendance at the IEP meeting, or Reconvene the IEP team to review the IEP will all required members present. Systemic Correction The district must submit evidence to OEC of written procedures and practices in place regarding people qualified to interpret the instructional implications of evaluation results involvement in the IEP process. 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 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		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 and preschool student IEPs indicated that the child had an IEP in effect as reported on the LEA's December 1, 2010 Child Count Report.	None Systemic Correction None	
DV-2	300.645	Record Review	Individual Correction	⊠ NA
	R.C. 3301.07.14	All school age and preschool student ETRs indicated that the child had an ETR in effect as reported on the LEA's December 1, 2010 Child Count Report.	None Systemic Correction None	
DV-3	SPP Indicator 20: Accurate and Timely Reporting of Special Education Event Record	Record Review All school age student and preschool student records had accurate student data reported by the LEA through the Education Management Information System (EMIS) for the December 1, 2010 Child Count Report, specifically in the following area(s): a) DOB b) IEP date (IIEP, RIEP, TIEP, CIEP, or FIEP events) 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	Individual Correction None Systemic Correction None	NA NA

Record	Regulation 34		Evidence of Correction	Must be	
Review Item	CFR or OAC	Evidence of Findings	Required Actions	addressed in CAP	
DV-4	SPP Indicator 11 300.301(c)(1)(i)	Record Review All school age and preschool student initial evaluations reported as being conducted within 60 days of the district receiving parental consent for the evaluation was conducted within the required timeline.	Individual Correction None Systemic Correction None	⊠ NA	
DV-5	SPP Indicator 12 300.124	Record Review All preschool IEPs showed evidence that an IEP was in place for 3 year olds transitioning from Early Intervention Programs (0-3 years) on or before the child's third birthday.	Individual Correction None Systemic Correction None	⊠ NA	
DV-6 A/B	SPP Indicator 20 for Secondary Transition Plans	Eight school age IEPs did not show evidence that the secondary transition plan reported in EMIS during 2010-2011 was in place that meets all 8 required elements of IDEA for the student, specifically in the following area(s): 1. There are appropriate measurable postsecondary goal(s). 2. The postsecondary goals are updated annually. 3. The postsecondary goals were based on age appropriate transition assessment. 4. There are transition services that will reasonably enable the student to meet the postsecondary goal(s). 5. The transition services include courses of study that will reasonably enable the student to meet the postsecondary goal(s). 6. The annual goal(s) are related to the student's transition service needs. 7. There is evidence the student was invited to the IEP Team Meeting where transition services were discussed. 8. When appropriate, there is evidence that a representative of any participating agency was invited to the IEP Team Meeting.	Individual Correction Eight current IEPs did not contain transition plans that meet all 8 required elements of IDEA. The district must reconvene the IEP teams to review and correct the secondary transition plan for the eight records identified as still noncompliant or provide documentation of the student's withdrawal date. Systemic Correction The district must submit evidence to OEC of written procedures and practices in place regarding data reporting. 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.	

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

Component 1: Statement of Accounts

The district/school has submitted its FY11 FERs for IDEA – ARRA funds and IDEA Pre-School ARRA funds. The Financial Detail (FINDET) Report for those funds and the Final Expenditure Reports are consistent and in agreement. 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		Evidence of Correction		Must be
Citation	Evidence	Required Actions	Date Due	addressed in CAP
300.202	The FER for FY11 516 ARRA matched the BUDLED provided by the district. No issues were found.	Individual Correction None		⊠ NA
	The FY12 fund 516 and 587 expenditures to date are in line with the budget for each fund in the CCIP. The expenditures were accounted for in the correct budget categories.	Systemic Correction None		

Component 2: Payroll Expenditures

The district/school is able to document that the federal funds were expended for an appropriate purpose; payroll expenditures are supported by Time and Effort Logs 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 FERs are in agreement.

Findings		Evidence of Correction		Must be
Citation	Evidence	Required Actions	Date Due	addressed in CAP
300.202	Nineteen staff members from FY11 ARRA and fifteen from FY12 516 IDEA funds were reviewed for certification /licensure, job description as well as payroll expenditures properly coded. Four substitutes for Classroom Aides were paid from FY12 516 IDEA funds and did not possess a certificate or license. The ACCRPTs for fund FY11 ARAA and FY12 516 IDEA were reviewed for the time period spanning July 1, 2010 to September 2011 and currently through March 2012. No coding errors were noted. Semi-annual certifications, timesheets and time /efforts logs were provided for all staff paid from these funds.	Individual Correction Same as systemic correction Systemic Correction In discussing this issue with the district's personnel person, for the 2012-13 school year all classroom aide substitutes paid from IDEA 516 funds will be required to possess an appropriate certificate/license. Documentation will be provided to OEC to confirm this action.		

Component 3: Non-Payroll Expenditures

The district/school is able to document that the federal funds were expended 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		Evidence of Correction		Must be addressed in CAP
Citation	Required Actions	Date Due		
300.202	27 voucher packets for FY11 Fund 516 special cost center 932O and thirteen from FY12 516 IDEA funds were reviewed and no coding errors were noted.			⊠ NA
		Systemic Correction None		

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

If the district/school expended 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 Part B purposes only and can be removed from the non-public school without remodeling the school facility.

Findings		Evidence of Correction		Must be
Citation	Evidence	Required Actions	Date Due	addressed in CAP
300.202	Seven voucher packets were reviewed from FY11 516 ARRA and funds .The district followed their purchasing and inventory procedures as it relates to these purchases. These inventoried items (17) were located for testing. They were properly tagged and easily located per the district's inventory documentation.	Individual Correction None Systemic Correction None		⊠ NA

Component 5: Equipment inventory policy and procedures

The district/school retains control and administration of funds used to purchase materials, equipment and property purchased with those funds for the uses and purpose 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		Evidence of Correction		Must be
Citation	Evidence	Required Actions	Date Due	addressed in CAP
300.202	The district provided their procurement policy as it is	Individual Correction		⊠ NA
	located on their district's website.	None		
	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	None		
	was updated within the last two years.			

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		Evidence of Correction		Must be
Citation	Evidence	Required Actions	Date Due	addressed in CAP
300.130 through 300.144	The district does not have any participating non-publics.	Individual Correction None Systemic Correction None		⊠ 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	Evidence	Evidence of Correction		Must be
Citation		Required Actions	Date Due	addressed in CAP
300.165 and Part 300.201	The district published notice of receipt of funding and directed feedback and comments to be sent to the Special Education Supervisor. The district did not hold a meeting to share the spending plan with the public. OEC provided a copy of the law to the special education director.	Individual Correction None Systemic Correction The district will review the law as it pertains to public participation and develop a policy and procedure to ensure the requirements of the law are met. The district will provide evidence that it held a public meeting for school year 2012-13.		∑ Yes

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 CIES is 15% or less 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.

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		Evidence of Correction		Must be
Citation	Evidence	Required Actions	Date Due	addressed in CAP
300.205	The district did not participate in redirecting their funds for CEIS.	Individual Correction None		⊠ NA
		Systemic Correction None		

Gifted Education Review

A gifted education review to ensure compliance with state law and state *Operating Standards for Identifying and Serving Gifted Students* was conducted on April 2, 2012 by Beth Hahn.

Eight gifted education components were addressed during the onsite review. Each component is detailed below, including a description of evidence provided and reviewed and corrective action required to resolve any issues of non-compliance.

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

Component 1: Gifted Budget

Based on Am. Sub. HB 1, 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? In addition, did districts that in fiscal year 2009 received gifted student services from an ESC – and the ESC received gifted unit funding in fiscal year 2009 – 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 from the funds received through the EBM an amount not less than the amount of gifted unit funding expended by an ESC in fiscal year 2009 for the district's students?

Citation	Evidence of Findings	Evidence of Correction Required Actions	Must be addressed in CAP
ORC 3306.09(G)	OEC reviewed district spending related to gifted education. The district did not have maintenance of effort related to unit funding in 2009. Evidence was provided that 2009 levels of ESC services are maintained. The district did not spend gifted identification funds at the required levels in 2010-11, but provided evidence that they have spent the required funds in 2011-12 and have plans to spend an additional amount equal to 2010-11 requirements.	None	⊠ NA

Component 2: 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?

		Evidence of Correction	Must be
Citation	Citation Evidence of Findings	Required Actions	addressed in CAP
OAC 3301- 51-15(D)(4)	WEPs for ten students were provided and reviewed. All attributes were present on all WEPs.	Individual Correction	⊠ NA
31-13(D)(4)	attributes were present on all WE1 3.	None	
		Systemic Correction	
		None	

Component 3: 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.

		Evidence of Correction	Must be
Citation	Evidence of Findings	Required Actions	addressed in CAP
ORC 3324.06(D)	Each gifted service offered in the district is available to all eligible students in each building in the district at that	Individual Correction	⊠ NA
	grade level. Services are available to all eligible students.	None	
		Systemic Correction	
		None	

Component 4: Acceleration and Attestation

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

		Evidence of Correction	Must be
Citation	Evidence of Findings	Required Actions	addressed in CAP
ORC 3324.10	A WAP was provided for subject acceleration. The district provided evidence that they are implementing subject acceleration. The district provided evidence that they have made information about the acceleration policy available to staff through staff memos. The district provided evidence that parents are made aware of the acceleration policy through the district website.	Individual Correction None Systemic Correction None	⊠ NA

Component 5: 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 Required Actions	Must be addressed in CAP
OAC 3301- 51-15(E)(2)	Documentation was provided that verified district compliance. All requirements regarding percentage of time providing direct instruction and having other duties		⊠ NA
	related to gifted education were met.	Systemic Correction None	

Component 6: Licensure Attestation

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
Citation		Required Actions	addressed in CAP
OAC 3301- 51-15(E)(3), OAC 3301-	Copies of licenses for the gifted coordinator and the GISs were provided for review. Staff members hold the appropriate licensure or endorsement for the position of		⊠ NA
51-15(E)(6)	gifted coordinator and/or GIS.	Systemic Correction None	

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)	The district provided evidence that this requirement has been met.	Individual Correction	⊠ NA
		None	
		Systemic Correction	
		None	

Component 8: Requirement for Regular Education Teacher Professional Development

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 attested that this requirement is not applicable because no general education classes are reported as service.	Individual Correction	⊠ NA
		None	
		Systemic Correction	
		None	