

5/10/2012

Plymouth-Shiloh Local School District IRN 049460

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 March 6-8, 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 March 6-8, 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 February 14, 2012, Plymouth-Shiloh School District mailed 133 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 March 6, 2012 on the school website.

On March 6, 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 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. All attendees made comments during the public meeting. Written comment forms were available before, during and after the meeting. OEC received no 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 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 March 7, 2012, OEC consultants reviewed 40 records of school age students with disabilities. An OEL&SR consultant, on March 7, 2012, reviewed four 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 March 8, 2012, OEC consultants held four sessions of interviews with three administrators and 30 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 Plymouth-Shiloh 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: 09-14-2012

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: 10-26-2012

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: 05-09-2013

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	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) 300.305(a)	Record Review All reevaluation records indicated that the child's reevaluation was completed within the three year timeline. 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	Individual Correction None Systemic Correction None Individual Correction None Systemic Correction None Systemic Correction None	NA NA
CF-3	OAC 3301-51-06 (2) and OAC 3301-51- 06(4)	suspecting or when determining eligibility for Part B supports and services. Record Review Three preschool initial evaluations did not appropriately document interventions provided to resolve concerns for the child performing below grade-level standards. All school age initial evaluations appropriately documented interventions provided to resolve concerns for the child performing below grade-level standards.	Individual Correction OEC has verified that these students have 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.	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-4	300.501(b)(1)	Record Review All school age and preschool student records showed evidence that the evaluation planning team included the parent.	Individual Correction None Systemic Correction None	⊠ NA
CF-5	300.305(a)(1)	Record Review All school age and preschool student evaluations provided evidence that the evaluation planning team reviewed existing data on the child.	Individual Correction None Systemic Correction None	⊠ NA
CF-6	300.305(a)(2)	Record Review One preschool student evaluation did not provide evidence that the evaluation planning team identified what additional data, if any, were needed. All school age 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	Regulation 34	Evidence of Findings	Evidence of Correction	Must be addressed in
Item	CFR or OAC	Evidence of Findings	Required Actions	CAP
CF-7	300.304(c)(4); OAC 3301-51-01; and OAC 3301- 51-06	Record Review One school age student evaluation did not provide evidence that the evaluation addresses all areas related to the suspected disability. All preschool 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 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 Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction Required Actions	Must be addressed in CAP
CF-9	300.306(a)(1)	Record Review All school age and preschool student initial evaluations showed evidence that a group of qualified professionals as appropriate to the suspected disability were involved in determining whether the child is a child with a disability.	qualified professionals participated in the eligibility	NA NA

Record	Be mulation 24		Evidence of Correction	Must be
Review Item	Regulation 34 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)	Three school age 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.
		All preschool reevaluations 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.	 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 All school age and preschool student IEPs addressed how the child's disability affects his/her involvement and progress in the general education curriculum.		⊠ NA
DS-2	300.320(a)(1)	Record Review Eight school age student IEPs did not contain Present Levels of Academic Achievement and Functional Performance (PLOP) that addressed the needs of the student. All preschool IEPs contained Present Levels of Academic Achievement and Functional Performance (PLOP) that addressed the needs of the student.	eight 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	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-3	300.320	Record Review	Individual Correction	⊠ No
	(a)(2)(i)(A)	One preschool student IEP did not contain annual goals that address the child's academic area(s) of need. All school age 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.	
DS-4	300.320(a)(2)(i)	Record Review	Individual Correction	⊠ No
	(A)	Two school age and one preschool student IEPs did not contain annual goals that address the child's functional area(s) of need.	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	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 functional needs.	
			OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.	

Record	Pogulation 24		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)	Evidence of Findings Record Review Eleven school age student and one preschool student IEPs did not contain measurable annual goals.		
			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-6	300.320(a)(4)	Record Review Fourteen 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.	Individual Correction The district must reconvene the IEP teams of the 18 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. 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.	Yes A Corrective Action Plan is required due to meeting the 30% threshold of non-compliance.
DS-7	300.320(a)(7)	Record Review Eight school age student IEPs did not indicate the location where the specially designed instruction will be provided. All preschool student IEPs indicated the location where the specially designed instruction will be provided.	Individual Correction 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. 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.	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-8	300.320(a)(7)	Record Review	Individual Correction	⊠ No
		Three school age student IEPs did not indicate the amount of time and frequency of the specially designed instruction.	The district must reconvene the IEP teams of the three IEPs identified as noncompliant to review and amend the amount of time and frequency of the specially designed instruction.	The district does not need to address this finding in a Corrective
		All preschool student IEPs indicated the amount of time and frequency of the specially designed instruction.	Systemic Correction	Action Plan.
			The district must submit evidence to OEC of written procedures and practices in place regarding the IEP process of determining the amount and frequency of specially designed instruction to be provided.	
			OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.	
DS-9	300.320(a)(4)	Record Review	Individual Correction	⊠ No
		One school age student IEP did not identify related services that address the needs of the child and support the annual goals.	The district must reconvene the IEP team of the one IEP identified as noncompliant to review and amend the IEP to include related services that were	The district does not need to address this finding in a Corrective
		All preschool student IEPs identified related services that address the needs of the child and	identified as needed in the IEP.	Action Plan.
		support the annual goals.	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.	

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 One school age student IEP did not indicate the location where the related services will be provided. All preschool IEPs indicated the location where the related services will be provided.	Individual Correction The district must reconvene the IEP team of the one IEP identified as noncompliant to review and amend the IEP to include the location where the related services will be provided. 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 related services will occur. OEC will contact the district for submission of new records and review these records to determine	No The district does not need to address this finding in a Corrective Action Plan.
DS-11	300.320(a)(7)	Record Review One school age student IEP did not indicate the amount of time and frequency of the related services to be provided. All preschool IEPs indicated the amount of time and frequency of the related services to be provided.	compliance with this regulation. 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.

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	Review CEP or OAC	Evidence of Findings	Required Actions	addressed in CAP
LRE-1	300.324(a)(2)(v)	Record Review	Individual Correction	⊠ NA
		None of the school age student and preschool student IEPs identified a need for assistive technology to enable the child to be involved in and make progress in the general education curriculum.	None Systemic Correction None	
		<u>Interviews</u>		
		During the interview process, we discussed a need to indicate through the student records any need for assistive technology, including technology that is built into the classroom if a student requires it to be successful in the general education environment.		
LRE-2	300.320(a)(6)(i)	Record Review	Individual Correction	⊠ NA
		All school age student and preschool student IEPs identified accommodations provided to enable the child to be involved in and make progress in the general education curriculum.	None Systemic Correction None	
LRE-3	300.320(a)(4)	Record Review	Individual Correction	⊠ No
		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.	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.	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 modifications.	
			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-4	300.320(a)(4) 300.320(a)(5)	Record Review All school age and preschool student IEPs identified supports for school personnel to enable the child to be involved in and make progress in the general education curriculum. Record Review	Individual Correction None Systemic Correction None Individual Correction	NA No
		Eight 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. All preschool student IEPs included 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 eight IEPs identified as noncompliant to review and include a justification for why the child was removed from the regular education classroom. The justification should: 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 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.	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
Review Regulation 34	Record Review One school age and one preschool student IEP did not indicate that the IEP Team included a parent.	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
LRE-7	300.321(2)	Record Review Four school age and four preschool student IEPs did not indicate that the IEP Team included a regular education teacher.	Individual Correction For the eight 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	No 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 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.	
LRE-8	300.321(3)	Record Review All school age and preschool student IEPs indicated that the IEP Team included a special education teacher.	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
LRE-9	300.321(4)	Record Review	Individual Correction	⊠ NA
		All school age and preschool student IEPs indicated that the IEP Team included an LEA	None	
		representative.	Systemic Correction	
			None	
LRE-10	300.321(5)	Record Review	Individual Correction	⊠ NA
indicated that the IEP Team included of a person qualified to interpret the instructional implications of		All school age and preschool student IEPs indicated that the IEP Team included of a person	None	
		qualified to interpret the instructional implications of	Systemic Correction	
	evaluation results.		None	

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 Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction Required Actions	Must be addressed in CAP
DV-1	300.645 R.C. 3301.07.14	Record Review Two preschool student IEPs indicated that the child did not have an IEP in effect as reported on the LEA's December 1, 2010 Child Count Report.	Individual Correction None 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.	No The district does not need to address this finding in a Corrective Action Plan.
DV-2	300.645 R.C. 3301.07.14	Record Review Two preschool student ETRs indicated that the child did not have an ETR in effect as reported on the LEA's December 1, 2010 Child Count Report.	Individual Correction None 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.	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
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
DV-4	SPP Indicator 11 300.301(c)(1)(i)	Record Review All school age student 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

	egulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction Required Actions	Must be addressed in CAP
A/B for S	P Indicator 20 Secondary Insition Plans	Record Review Six 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 Six 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 six 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	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.

Finding		Evidence of Correction		Must be
Citatio	L Evidence	Required Actions	Date Due	addressed in CAP
300.20	The FER for FY11 516 ARRA matched the FINDET provided by the district. No issues were found. The FY12 fund 516 and 587(ESC Consortium) 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.	Individual Correction None Systemic Correction None		⊠ NA

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.

Finding		Evidence of Correction		Must be
Citatio	L Evidence	Required Actions	Date Due	addressed in CAP
300.20	There were no payroll expenditures from FY11 516 ARRA and FY12 funds.	Individual Correction None Systemic Correction None		⊠ NA

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
Citation	Evidence	Required Actions	Date Due	addressed in CAP
300.202	12 voucher packets were reviewed for FY11 Fund 516 special cost center 932O. There were no errors noted.	Individual Correction None		⊠ NA
	10 voucher packets were reviewed for FY12 fund 516 Fund. The district purchased services from the Mid-Ohio ESC for 12 aides. Certification/licensure and Semi-Certification were checked. No errors were found.	Systemic Correction None		
	For FY12 587 funds - the district participates in a consortium with Mid-Ohio ESC. Expenditures were reviewed and all expenses were appropriate.			
	Job descriptions were also provided by the district.			

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	There were no expenditures from 516 FY11 ARRA or FY12 funds. An inventory list was provided with past purchases listed. Several equipment items were checked with the appropriate tag for identification.	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's procurement policy was provided and reviewed.	Individual Correction None		⊠ NA
	The district is properly identifying equipment and is complying with the board policy in cataloguing and inventorying equipment.			

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	There are no non-publics that participate within the district.	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 of Correction		Must be
Citation	Evidence	Required Actions	Date Due	addressed in CAP
300.165 and Part 300.201	The district did not hold a public hearing, provide adequate notice of the hearing and an opportunity for comment to the general public including individuals with disabilities and parents of children with disabilities in the planning of IDEA funds. A copy of the law was provided to the treasurer and as well as communicated 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.		

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 the redirection of funds.	Individual Correction None Systemic Correction None		⊠ NA

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 February 16, 2012 by Rosemary Pearson.

Eight gifted education components were addressed during the 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?

		Evidence of Correction	Must be
Citation	Evidence of Findings	Required Actions	addressed in CAP
ORC 3306.09(G)	The district is not meeting this requirement as continued in Am. Sub. HB 153. In FY09, the district had .42 FTE gifted coordinator from the ESC. The district discontinued this contract this year and is not currently meeting the maintenance of effort requirement which requires them to 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.	Individual Correction No individual correction is required. Systemic Correction The district must describe in the corrective action plan the process to become compliant with this requirement. The plan must address how this district will 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 beginning with the 2012-2013 school year.	∑ Yes

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 Findings	Evidence of Correction	Must be
Citation		Required Actions	addressed in CAP
OAC 3301- 51-15(D)(4)	This component does not apply. This district does not provide gifted services.	Individual Correction	⊠ NA
31-13(0)(4)	provide gilled services.	N/A	
		Systemic Correction	
		N/A	

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 Findings	Evidence of Correction	Must be
Citation		Required Actions	addressed in CAP
ORC 3324.06(D)	This component does not apply. This district does not provide gifted services.	Individual Correction	⊠ NA
3324.00(D)	provide girted services.	N/A	
		Systemic Correction	
		N/A	

Component 4: Acceleration and Attestation

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

	Evidence of Findings	Evidence of Correction	Must be
Citation		Required Actions	addressed in CAP
ORC 3324.10	The district provided evidence that they have implemented their acceleration policy. The district does not use the Iowa Acceleration Scale (currently the only state approved process) to guide whole grade	Individual Correction None	
	accelerations or early entrance to kindergarten.	Systemic Correction The district must show evidence that they are using the lowa Acceleration Scale to guide whole grade accelerations and early entrance to kindergarten.	

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?

	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
Citation		Required Actions	
OAC 3301- 51-15(E)(2)	This component does not apply. The district does not provide gifted services.	Individual Correction	⊠ NA
31-13(E)(Z)	provide girted services.	N/A	
		Systemic Correction	
		N/A	

Component 6: Licensure Attestation

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

	Evidence of Findings	Evidence of Correction	Must be
Citation		Required Actions	addressed in CAP
OAC 3301- 51-15(E)(3),	This component does not apply. The district does not have a gifted coordinator.	Individual Correction	⊠ N/A
OAC 3301-	nave a girted coordinator.	N/A	
51-15(E)(6)		Systemic Correction	
		N/A	

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 Required Actions	Must be addressed
OAC 3301- 51-15(E)	This component does not apply. The district does not provide gifted services.	Individual Correction N/A Systemic Correction N/A	in CAP ⊠ NA

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?

Oitetie ::	Evidence of Findings	Evidence of Correction	Must be
Citation		Required Actions	addressed in CAP
OAC 3301- 51-	This component does not apply. The district does not provide gifted services.	Individual Correction	⊠ NA
15(D)(3)(b)(i)	provide girted services.	N/A	
		Systemic Correction	
		N/A	