

5/3/2012

# Washington Court House City School District IRN 045013

# 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 February 21-23, 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 February 21-23, 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 21, 2012, Washington Court House City Schools mailed 417 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 February 3, 2012 in The Record Herald.

On February 21, 2012, OEC consultants held a public meeting for parents and other interested parties. Public parent meeting dates for all districts selected for IDEA Reviews are posted on the ODE website. Two parents and three State Support Team (SST) Region 14 representatives attended the public meeting. Attendees could speak to OEC representatives publicly in the meeting or individually, provide written comments, or both. Both parents made comments during the public meeting. Written comment forms were available before, during and after the meeting. OEC received two 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 February 21-22, 2012, OEC consultants reviewed 42 records of school age students with disabilities. An OEL&SR consultant, on February 21-22, 2012, reviewed 6 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 February 22-23, 2012, OEC consultants held four sessions of interviews with 10 administrators and 23 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 Washington Court House City 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 <a href="mailto:Stephanie.Falor@education.ohio.gov">Stephanie.Falor@education.ohio.gov</a> 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: 09-04-2012

#### **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: 10-16-2012** 

#### **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: 05-02-2013

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:** Cathy Csanyi, Educational Consultant, at (614) 387-2239, toll-free at (877) 644-6338, or by e-mail at <a href="mailto:Cathy.Csanyi@education.ohio.gov">Cathy.Csanyi@education.ohio.gov</a>.
- **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 Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction  Required Actions	Must be addressed in CAP
CF-1	300.303(b)(2)	Record Review  All school age and preschool reevaluation records indicated that the child's reevaluation was completed within the three year timeline.	Individual Correction None Systemic Correction None	⊠ NA
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
CF-3	OAC 3301-51-06 (2) and OAC 3301-51- 06(4)	Record Review  All school age and preschool initial evaluations appropriately documented interventions provided to resolve concerns for the child performing below grade-level standards.	Individual Correction None Systemic Correction None	⊠ NA

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  Eleven school age student records did not show evidence that the evaluation planning team included the parent.  All preschool student records showed evidence that the evaluation planning team included the parent.  Interviews  During the staff interviews, OEC learned that teachers are providing email contacts, letters home, phone calls home and weekly newsletters in efforts to increase parental involvement.	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.
CF-5	300.305(a)(1)	Record Review  Five school age student evaluations did not provide evidence that the evaluation planning team reviewed existing data on the child.  All preschool student evaluations provided evidence that the evaluation planning team reviewed existing data on the child.  Interviews  During the staff and administrative interviews, we discussed ways to document current data both within the ETR and the IEPs.	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.

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction  Required Actions	Must be addressed in CAP
CF-6	300.305(a)(2)	Record Review  Three school age student evaluations did not provide evidence that the evaluation planning team identified what additional data, if any, were needed.  All preschool 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.
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 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.

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction  Required Actions	Must be addressed in CAP
CF-8	300.306(a)(1)	Record Review Three school age and one preschool student records did not show evidence that the parent of the child was involved in determining whether the child is a child with a disability.	Individual Correction  The district must provide evidence that the parent was involved in determining whether the child is a child with a disability or evidence that the parent was provided the opportunity to participate in the eligibility determination as evidenced by three attempts to contact the parent. If not, the IEP team must reconvene the ETR meeting and provide OEC evidence of parent involvement.  Systemic Correction  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.
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.		NA NA

Record Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction  Required Actions	Must be addressed in CAP
CF-10 300.306(a)(1); 300.305(a); and 3301-51-01 (B)(21)	Record Review  One school age and two preschool 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.  Interviews  During the staff and administrative interviews we discussed how to encourage parents to be actively involved in their child's educational planning.	Individual Correction  The district must provide evidence that the IEP team and other qualified professionals participated in the eligibility determination. If not, the IEP team must reconvene the ETR meeting and provide OEC evidence of group participation.  IEP Team Members include, but are not limited to:  1. Parent 2. Regular Education Teacher 3. Special Education Provider 4. District Representative 5. An individual who can interpret the instructional implications of evaluation results, 6. At the discretion of the parent or school district, other individuals who have knowledge or special expertise regarding the child, including related services personnel as appropriate; 7. Whenever appropriate, the child with a disability.  Systemic Correction  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.

# **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 Findings	Evidence of Correction	Must be
Item	CFR or OAC	Evidence of Findings	Required Actions	uddiessed iii OAi
Review	Regulation 34 CFR or OAC 300.320(a)(1)(i)	Record Review  One school age student IEP did not address how the child's disability affects his/her involvement and progress in the general education curriculum.  All preschool IEPs addressed how the child's disability affects his/her involvement and progress in the general education curriculum.		Must be addressed in CAP  No The district does not need to address this finding in a Corrective Action Plan.

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction  Required Actions	Must be addressed in CAP
DS-2	300.320(a)(1)	Record Review	Individual Correction	⊠ No
		Twelve 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 PLOP that addressed the needs of the student.  Interviews  During the staff interviews, we discussed how to document in the IEP the various assessments that are incorporated weekly and monthly in the Washington Court House City School District.	<ul> <li>The district must reconvene the IEP teams of the 12 IEPs identified as noncompliant to review and amend the PLOP related to each goal to include:</li> <li>A summary of current daily academic/ behavior and/or functional performance (strengths and needs);</li> <li>Baseline data provided for developing a measurable goal.</li> <li>For preschool, the PLOP should relate to the child's developmental domains, functional performance and pre-academic skills.</li> <li>Systemic Correction</li> <li>The district must submit evidence to OEC of written</li> </ul>	The district does not need to address this finding in a Corrective Action Plan.
			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)	Three school age student and one preschool student IEPs did not contain annual goals that address the child's academic area(s) of need.	The district must reconvene the IEP teams of the four IEPs 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.	
5/0/0040		West State On Alle as O'' Oak	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-4	300.320(a)(2)(i) (A)	Record Review Three school age student and two preschool student IEPs did not contain annual goals that address the child's functional area(s) of need.	Individual Correction  The district must reconvene the IEP teams of the five IEPs identified as noncompliant to review and amend the IEP to include annual goals that address the functional needs that were identified in the IEP or provide evidence that the IEP team, based on the severity of the needs of the child, decided to prioritize addressing the needs  Systemic Correction  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.	No The district does not need to address this finding in a Corrective Action Plan.

Record	Regulation 34		Evidence of Correction	Must be
	CFR or OAC	Evidence of Findings	Required Actions	addressed in CAP
	00.320(a)(2)(i)	Record Review Thirteen school age student and one preschool student IEPs did not contain measurable annual goals.	Individual Correction  The district must reconvene the IEP teams of the 14 IEPs identified as noncompliant to review and amend annual goals to contain the following six critical elements:  1. Who? 2. Will Do What? 3. To What Level of Degree? 4. Under What Conditions? 5. In What Length of Time? 6. How Will Progress Be Measured?  Systemic Correction  The district must implement new procedures to ensure that annual goals written subsequent to this report will include the following six critical elements to demonstrate correction:  1. Who? 2. Will Do What? 3. To What Level of Degree? 4. Under What Conditions? 5. In What Length of Time? 6. How Will Progress Be Measured?  OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.	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-6	300.320(a)(4)	Record Review  Fifteen school age student and five preschool student IEPs did not contain a statement of specially designed instruction that addresses the needs of the child and supports annual goals.  Interviews  During the staff interviews, staff discussed multiple approaches for administering specially designed instruction, the staff will receive training on how to appropriately document the services they are providing.	Individual Correction  The district must reconvene the IEP teams of the 20 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  Four school age student IEPs did not indicate the location where the specially designed instruction will be provided.  All preschool IEPs indicated the location where the specially designed instruction will be provided.	Individual Correction  The district must reconvene the IEP teams of the four 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
		Eleven school age student IEPs did not indicate the amount of time and frequency of the specially designed instruction.  All preschool IEPs indicated the amount of time and frequency of the specially designed instruction.	The district must reconvene the IEP teams of the 11 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 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 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	⊠ NA
		All school age and preschool student IEPs identified related services that address the needs	None	
		of the child and support the annual goals.	Systemic Correction	
			None	
DS-10	300.320(a)(7)	Record Review	Individual Correction	⊠ NA
		All school age and preschool student IEPs indicated the location where the related services	None	
		will be provided.	Systemic Correction	
			None	
DS-11	300.320(a)(7)	Record Review	Individual Correction	⊠ NA
		All school age and preschool student IEPs indicated the amount of time and frequency of the	None	
		related services to be provided.	Systemic Correction	
			None	

# 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	lion and related services.	Evidence of Correction	Must be
Review Item	CFR or OAC	Evidence of Findings	Required Actions	addressed in CAP
LRE-1	300.324(a)(2)(v)	Record Review  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.		Yes A Corrective Action Plan is required due to meeting the 30% threshold of non-compliance.
LRE-2	300.320(a)(6)(i)	Record Review  One school age student IEP did not identify accommodations provided to enable the child to be involved in and make progress in the general education curriculum.  All preschool IEPs identified 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.

Record	Regulation 34		Evidence of Correction	Must be
Review Item	CFR or OAC	Evidence of Findings	Required Actions	addressed in CAP
LRE-3	300.320(a)(4)	Record Review	Individual Correction	⊠ No
		Six school age student IEPs did not identify modifications to enable the child to be involved in and make progress in the general education curriculum.  All preschool IEPs identified 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 six IEPs identified as noncompliant to review the modifications that would alter the amount or complexity of materials or the performance expected of the child from grade level curriculum expectations and include them on the IEP.  Systemic Correction	The district 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 modifications.	
			OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.	
LRE-4	300.320(a)(4)	Record Review	Individual Correction	
		One school age student IEP did not identify supports for school personnel to enable the child to be involved in and make progress in the general education curriculum.	The district must reconvene the IEP team of the one IEP 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.	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 supports for school personnel.	
			OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.	

Record Regulation 34			Evidence of Correction	Must be
Review Item	CFR or OAC	Evidence of Findings	Required Actions	addressed in CAP
LRE-5	300.320(a)(5)	Record Review	Individual Correction	⊠ No
		Two 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.	The district must reconvene the IEP teams of the two 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
		All preschool IEPs included an explanation of the extent to which the child will not participate with nondisabled children in 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.	Action Plan.

Record	Regulation 34	Evidence of Findings	Evidence of Correction	Must be
Review Item	CFR or OAC		Required Actions	addressed in CAP
LRE-6	300.321(1)	Record Review  Nine school age student and two preschool student IEPs did not indicate that the IEP Team included a parent.	Individual Correction	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
LRE-7	300.321(2)	Record Review	Individual Correction	⊠ No
		One school age student and two preschool student IEPs did not indicate that the IEP Team included a regular education teacher.	<ul> <li>For the three IEPs identified as noncompliant, the district must:</li> <li>Provide documentation that the parent was informed prior to the IEP meeting that the regular education teacher would not participate in the meeting, and</li> <li>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</li> <li>Reconvene the IEP team to review the IEP will all required members present.</li> <li>Systemic Correction</li> <li>The district must submit evidence to OEC of written procedures and practices in place regarding regular education teacher involvement in the IEP process.</li> <li>OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.</li> </ul>	The district does not need to address this finding in a Corrective Action Plan.
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
LRE-9	300.321(4)	Record Review  All school age student and preschool student IEPs indicated that the IEP Team included an LEA representative.	Individual Correction  None  Systemic Correction  None	⊠ NA

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction  Required Actions	Must be addressed in CAP
LRE-10 3	300.321(5)	Record Review Two preschool student IEPs did not indicate that the IEP Team included of a person qualified to interpret the instructional implications of evaluation results.  All school age IEPs indicated that the IEP Team included of a person qualified to interpret the instructional implications of evaluation results.	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 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	isition place in place that meets all required elements for	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	⊠ No	
	R.C.	One preschool student IEP indicated that the child	None	The district does	
	3301.07.14	did not have an IEP in effect as reported on the LEA's December 1, 2010 Child Count Report.	Systemic Correction	not need to address this finding	
	LEAS		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.	in a Corrective Action Plan.	
DV-2	300.645	Record Review	Individual Correction	⊠ NA	
	R.C.	All school age and preschool student ETRs indicated	None		
	3301.07.14	that the child had an ETR in effect as reported on the LEA's December 1, 2010 Child Count Report.	Systemic Correction		
		LEAS December 1, 2010 Child Count Report.	None		
DV-3	SPP Indicator	Record Review	Individual Correction	⊠ NA	
	20: Accurate and Timely	reported by the LEA through the Education Management Information System (EMIS) for the	None		
	Reporting of Special Education		Systemic Correction  None		
	Event Record	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			

Record	Regulation 34		Evidence of Correction	Must be
Review Item	CFR or OAC	Evidence of Findings	Required Actions	addressed in CAP
1	SPP Indicator 11 300.301(c)(1)(i)	Record Review All school age student initial evaluations reported as being conducted within 60 days of the district receiving parental consent for the evaluation was conducted within the required timeline.	Individual Correction None Systemic Correction None	⊠ NA
	SPP Indicator 12 300.124	Record Review All preschool IEP(s) 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
A/B 2	SPP Indicator 20 for Secondary Transition 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.  Interviews  During the staff interviews, we discussed ways to pull in various teachers to provide ideas for academic and skill based lessons to the transition planning. We also discussed ways to include functional based goals and support for training in writing compliant transition goals.	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.

Findings Citation	Evidence	Evidence of Correction		Must be addressed in CAP
		Required Actions	Date Due	
300.202	The FER for FY11 516 and 587 ARRA matched the BUDLED provided by the district. No issues were found.  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.	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.

Findings Citation	Evidence	Evidence of Correction		Must be addressed in CAP
		Required Actions	Date Due	
300.202	Fifteen staff members paid from 516 FY12 and FY11 ARRA was reviewed for certification /licensure .Payroll expenditures were properly coded and semi-annual certifications were provided for all staff paid from these funds.  Due to the union agreement, job descriptions do not exist.	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 Citation	Evidence	Evidence of Correction		Must be addressed in CAP
		Required Actions	Date Due	
300.202	Twenty-six voucher packets were reviewed for FY11 Fund 516 and 587 special cost center 932O. Three function code errors were identified – function 1100 Regular Education Elementary was used instead of function code 2213 Instructional Staff Training Services.  Twenty voucher packets were reviewed for FY12 516 and 587 Fund. One function code error was identified – function 1100 Regular Education Elementary was used instead of function code 2213 Instructional Staff Training Services. This was corrected and verified at the time of the review.	Individual Correction None  Systemic Correction None		⊠ NA
	Several purchase service contracts were reviewed and deemed appropriate.			

# 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 Citation		Evidence	Evidence of Correction		Must be addressed in CAP
			Required Actions	Date Due	
	300.202	The district provided evidence that they follow the board adopted procurement policy.	Individual Correction None		⊠ NA
			Systemic Correction None		

#### 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 Citation	Evidence	Evidence of Correction		Must be addressed in CAP
		Required Actions	Date Due	
300.202	The district is complying with board policies on equipment inventory. The technology staff person is electronically cataloguing all equipment purchases from all Title funds regardless of the amount of the purchases.	Individual Correction None Systemic Correction None		⊠ NA

#### **Component 6: Non-Public Count and Proportionate Share**

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

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

Findings Citation		Evidence	Evidence of Correction		Must be addressed in CAP
			Required Actions	Date Due	
	300.130 through 300.144	There are no non-publics that participate in the district.	Individual Correction None		⊠ NA
			Systemic Correction		
			None		

#### **Component 7: Notification of Public Participation**

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

Findings Citation	L Evidence	Evidence of Correction		Must be addressed in CAP
		Required Actions	Date Due	
300.165 and Part 300.201	The district places IDEA 516 funds on the board agenda for approval but does not provide a designated public meeting to the provide opportunity to the general public for comments. A copy of the regulation was provided to the treasurer.			∑ 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  $\frac{1}{2}$  of its additional allocation amount and the district can document the expenditures/reduction and the amount is shown in the CCIP.

Findings Citation	Evidence	Evidence of Correction		Must be addressed in CAP
		Required Actions	Date Due	
300.205	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 February 23, 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 Findings	Evidence of Correction	Must be addressed in CAP
Citation		Required Actions	
ORC 3306.09(G)	Evidence was provided to demonstrate that fiscal year 2012 gifted spending was equal to or more than fiscal	Individual Correction	⊠ NA
	year 2009 unit funding.	None	
		Systemic Correction	
		None	

#### 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?

Citation	Evidence of Findings	Evidence of Correction  Required Actions	Must be addressed in CAP
OAC 3301- 51-15(D)(4)	Students served in language arts classes in the middle school have WEPs that contain all of the required components. WEPs for students served by regular elementary classroom teachers did not list the classroom teacher as the service provider and did not include goals that match the areas of identification and service. This issue has been resolved and current WEPs have been provided which contain all of the required elements.	Individual Correction  None  Systemic Correction  None	⊠ NA

# **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 addressed in CAP
Citation		Required Actions	
ORC 3324.06(D)	The district attests that each gifted service offered in the district is available to all eligible students in each	Individual Correction	⊠ NA
3324.00(D)	building in the edictoics of the standard level	None	
		Systemic Correction	
		None	

## **Component 4: Acceleration and Attestation**

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

A	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
Citation		Required Actions	
ORC 3324.10	The district provided evidence to document the implementation of their acceleration policy.	Individual Correction	⊠ NA
		None	
		Systemic Correction	
		None	

# **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)	During the review, it was determined that the district is not using any staff as gifted intervention specialists. EMIS codes will be changed to reflect this.	Individual Correction  None	⊠ NA
	EIVITO Codes will be changed to renect this.	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?

0'(a)'a	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
Citation		Required Actions	
OAC 3301- 51-15(E)(3),	The gifted coordinators hold the appropriate licensure or endorsement for the position.	Individual Correction	⊠ NA
OAC 3301- 51-15(E)(6)	·	None	
31-13(L)(0)		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  Required Actions	Must be addressed in CAP
OAC 3301- 51-15(E)	This component does not apply. The district does not provide gifted services by a gifted intervention specialist.	Individual Correction N/A	⊠ NA
		Systemic Correction  N/A	

# **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
		Required Actions	in CAP
OAC 3301- 51-	The district attested and provided documentation to show that all general education teachers providing	Individual Correction	⊠ NA
15(D)(3)(b)(i)	teaching gifted students and ongoing assistance with	None	
	curriculum development and instruction from a gifted specialist and that curriculum related to gifted services	Systemic Correction	
	is differentiated.	None	