

<b>Garfield Heights School District IRN 044040</b>
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**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 7-9, 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 7-9, 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 January 23, 2012, Garfield Heights Schools mailed 585 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 January 17, 2012 on the district web and to the district calendar.

On February 7, 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. Eighteen parents, one student and three State Support Team (SST) Region 3 representatives attended the public meeting. Attendees could speak to OEC representatives publicly in the meeting or individually, provide written comments, or both. Eight parents and one student made comments during the public meeting.

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 8 and 9, 2012, OEC consultants reviewed 41 records of school age students with disabilities. An OEL&SR consultant, on February 9, 2012, reviewed six records as part of the Early Childhood Special Education Review. OEC selected records of a variety of children with disabilities from six buildings.

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

## 4. Staff/Administrative Interviews

On February 9, 2012, OEC consultants held three sessions of interviews with eight administrators and 15 teachers, 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 Garfield Heights 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 Karla Spangler, OEC Lead Consultant at [esclew\\_ks@sstr1.org](mailto:esclew_ks@sstr1.org). 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: 06-05-2012**

#### **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: 10-08-2012**

#### **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: 04-25-2013**

For questions about specific components of this report please contact:

- **Special Education School Age:** Karla Spangler, OEC Lead Consultant, at 419-, toll-free at (877) 644-6338, or by e-mail at [esclew\\_ks@sstr1.org](mailto:esclew_ks@sstr1.org) .
- **Special Education Early Childhood:** Edith Greer, Educational Consultant, at (330) 308-9939 ext. 8204, or by e-mail at [edith.greer@ecoesc.org](mailto:edith.greer@ecoesc.org).
- **Fiscal:** Stephanie Ferrell, Educational Consultant, at 614-752-1249, toll-free at (877) 644-6338, or by e-mail at [stephanie.ferrell@education.ohio.gov](mailto:stephanie.ferrell@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](mailto:rosemary.pearson@education.ohio.gov).

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

**Component 1: Child Find**

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

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
CF-1	300.303(b)(2)	<p><u>Record Review</u></p> <p>Two school age reevaluation records indicated that the child's reevaluation was not completed within the three year timeline.</p> <p>All preschool reevaluation records indicated that the child's reevaluation was completed within the three year timeline.</p>	<p><u>Individual Correction</u></p> <p>OEC has verified that these students have a current ETR in place, so no additional individual correction is required.</p> <p><u>Systemic Correction</u></p> <p>The district must submit evidence to OEC of written procedures and practices in place regarding child find evaluation process.</p> <p>OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.</p>	<p><input checked="" type="checkbox"/> No</p> <p>The district does <u>not</u> need to address this finding in a Corrective Action Plan.</p>
CF-2	300.305(a)	<p><u>Record Review</u></p> <p>All preschool evaluation records of children transitioning from Part C, did utilize 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.</p>	<p><u>Individual Correction</u></p> <p>None</p> <p><u>Systemic Correction</u></p> <p>None</p>	<p><input checked="" type="checkbox"/> NA</p>

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
CF-3	OAC 3301-51-06 (2) and OAC 3301-51-06(4)	<p><u>Record Review</u></p> <p>Two school age initial evaluations did not appropriately document interventions provided to resolve concerns for the child performing below grade-level standards.</p> <p><u>Interviews</u></p> <p>During the interviews, it was stated that there is too much time taken doing interventions prior to testing. Maybe times it takes more than one year.</p> <p>Also, there is no evidence of the interventions that were done.</p>	<p><u>Individual Correction</u></p> <p>OEC has verified that these students have a current IEP in place, so no additional individual correction is required.</p> <p><u>Systemic Correction</u></p> <p>The district must submit evidence to OEC of written procedures and practices in place regarding documentation of intervention and supports provided prior to completion of the initial evaluation team report.</p> <p>OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.</p>	<input checked="" type="checkbox"/> Yes A Corrective Action Plan is required due to meeting the 30% threshold of non-compliance
CF-4	300.501(b)(1)	<p><u>Record Review</u></p> <p>Eight school age records did not show evidence that the evaluation planning team included the parent.</p> <p>All preschool records showed evidence that the evaluation planning team included the parent.</p>	<p><u>Individual Correction</u></p> <p>The district must provide evidence that the parent was involved or provided the opportunity to participate (three documented attempts) in the evaluation planning process.</p> <p>The evidence may include; evaluation planning form, prior written notice, parent invitation, referral form or communication log.</p> <p><u>Systemic Correction</u></p> <p>The district must submit evidence to OEC of written procedures and practices in place regarding the evaluation planning process to include the parent.</p> <p>OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.</p>	<input checked="" type="checkbox"/> No The district does <u>not</u> need to address this finding in a Corrective Action Plan.

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
CF-5	300.305(a)(1)	<p><u>Record Review</u></p> <p>Twelve school age evaluations did not provide evidence that the evaluation planning team reviewed existing data on the child.</p> <p>All preschool evaluations provided evidence that the evaluation planning team reviewed existing data on the child.</p> <p><u>Interviews</u></p> <p>During the interviews, it was stated that there is very little collaboration between the psychologist and the general education teacher prior to testing. The psychologist does the entire report.</p>	<p><u>Individual Correction</u></p> <p>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.</p> <p><u>Systemic Correction</u></p> <p>The district must submit evidence to OEC of written procedures and practices in place to review existing data during the evaluation planning.</p> <p>OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.</p>	<p><input checked="" type="checkbox"/> No</p> <p>The district does <u>not</u> need to address this finding in a Corrective Action Plan.</p>
CF-6	300.305(a)(2)	<p><u>Record Review</u></p> <p>Thirteen school age evaluations did not provide evidence that the evaluation planning team identified what additional data, if any, were needed.</p> <p>All preschool evaluations provided evidence that the evaluation planning team identified what additional data, if any, were needed.</p>	<p><u>Individual Correction</u></p> <p>The district must provide the evaluation planning form or evidence documenting additional data, if any was reviewed during the evaluation planning process. If not, the IEP team must reconvene the ETR planning and ETR meeting.</p> <p><u>Systemic Correction</u></p> <p>The district must submit evidence to OEC of written procedures and practices in place to review additional data, if any during evaluation planning.</p> <p>OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.</p>	<p><input checked="" type="checkbox"/> Yes</p> <p>A Corrective Action Plan is required due to meeting the 30% threshold of non-compliance</p>

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
CF-7	300.304(c)(4); OAC 3301-51-01; and OAC 3301-51-06	<p><u>Record Review</u></p> <p>Eight school age evaluations did not provide evidence that the evaluation addresses all areas related to the suspected disability.</p> <p>All preschool evaluations provided evidence that the evaluation addresses all areas related to the suspected disability.</p>	<p><u>Individual Correction</u></p> <p>The district will convene the ETR team to conduct a reevaluation and provide evidence that the evaluation addresses all areas related to the suspected disability.</p> <p><u>Systemic Correction</u></p> <p>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.</p> <p>OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.</p>	<input checked="" type="checkbox"/> No The district does <u>not</u> need to address this finding in a Corrective Action Plan.
CF-8	300.306(a)(1)	<p><u>Record Review</u></p> <p>Four school age records did not show evidence that the parent of the child was involved in determining whether the child is a child with a disability.</p> <p>All preschool records showed evidence that the parent of the child was involved in determining whether the child is a child with a disability.</p>	<p><u>Individual Correction</u></p> <p>The district must provide evidence that the parent was involved in determining whether the child is a child with a disability or evidence that the parent was provided the opportunity to participate in the eligibility determination as evidenced by three attempts to contact the parent. If not, the IEP team must reconvene the ETR meeting and provide OEC evidence of parent involvement.</p> <p><u>Systemic Correction</u></p> <p>The district must submit evidence to OEC of written procedures and practices in place regarding the evaluation planning process to include the parent.</p> <p>OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.</p>	<input checked="" type="checkbox"/> No The district does <u>not</u> need to address this finding in a Corrective Action Plan.

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
CF-9	300.306(a)(1)	<p><u>Record Review</u></p> <p>One preschool student initial evaluation 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.</p> <p>All school age student initial evaluations showed evidence that a group of qualified professionals as appropriate to the suspected disability were involved in determining whether the child is a child with a disability.</p>	<p><u>Individual Correction</u></p> <p>The district must provide evidence that a group of qualified professionals participated in the eligibility determination. If not, the IEP team must reconvene the ETR meeting and provide OEC evidence of group participation.</p> <p>A group of qualified professionals includes the following, but is not limited to:</p> <ul style="list-style-type: none"> <li>• Parent</li> <li>• Additional group members: <ul style="list-style-type: none"> <li>• The child's regular education teacher; or a regular classroom teacher qualified to teach a child of his or her age; or</li> <li>• For a preschool child an individual qualified by the SEA to teach a child of his or her age; and</li> <li>• At least one person qualified to conduct individual diagnostic examinations of children.</li> </ul> </li> </ul> <p><u>Systemic Correction</u></p> <p>The district must submit evidence to OEC of written procedures and practices in place regarding the eligibility determination process.</p> <p>OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.</p>	<input checked="" type="checkbox"/> No The district does <u>not</u> need to address this finding in a Corrective Action Plan.

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
CF-10	300.306(a)(1); 300.305(a); and 3301-51-01 (B)(21)	<p><u>Record Review</u></p> <p>Six 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.</p> <p>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.</p>	<p><u>Individual Correction</u></p> <p>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.</p> <p>IEP Team Members include, but are not limited to:</p> <ol style="list-style-type: none"> <li>1. Parent</li> <li>2. Regular Education Teacher</li> <li>3. Special Education Provider</li> <li>4. District Representative</li> <li>5. An individual who can interpret the instructional implications of evaluation results,</li> <li>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;</li> <li>7. Whenever appropriate, the child with a disability.</li> </ol> <p><u>Systemic Correction</u></p> <p>The district must submit evidence to OEC of written procedures and practices in place regarding the eligibility determination process.</p> <p>OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.</p>	<p><input checked="" type="checkbox"/> No</p> <p>The district does <u>not</u> need to address this finding in a Corrective Action Plan.</p>

**Component 2: Delivery of Services**

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

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
DS-1	300.320(a)(1)(i)	<p><u>Record Review</u></p> <p>Three school age IEPs did not address how the child's disability affects his/her involvement and progress in the general education curriculum.</p> <p>All preschool IEPs addressed how the child's disability affects his/her involvement and progress in the general education curriculum.</p> <p><u>Interviews</u></p> <p>During the interviews, it was stated that there is a lack of collaboration between the general education teacher and the intervention specialist.</p> <p>At times, the intervention specialist does not know what is going on in the general education classroom.</p>	<p><u>Individual Correction</u></p> <p>The district must reconvene the IEP teams of the three IEPs identified as noncompliant to review and amend the IEP to include a statement of how the child's disability affects the child's participation in appropriate activities to access, participate and progress in the general education curriculum.</p> <p><u>Systemic Correction</u></p> <p>The district must submit evidence to OEC of written procedures and practices in place regarding the involvement and progress of children with disabilities in the general education curriculum and assessing how their disability affects that involvement.</p> <p>OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.</p>	<p><input checked="" type="checkbox"/> No</p> <p>The district does <u>not</u> need to address this finding in a Corrective Action Plan.</p>

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
DS-2	300.320(a)(1)	<p><u>Record Review</u></p> <p>Thirteen school age and one preschool IEPs did not contain Present Levels of Academic Achievement and Functional Performance (PLOP) that addressed the needs of the student.</p> <p><u>Interviews</u></p> <p>During the interview process, much was discussed about the new school daily schedule and the study of student data. More data should be available in the future.</p>	<p><u>Individual Correction</u></p> <p>The district must reconvene the IEP teams of the fourteen IEPs identified as noncompliant to review and amend the PLOP related to each goal to include:</p> <ul style="list-style-type: none"> <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> </ul> <p><u>Systemic Correction</u></p> <p>The district must submit evidence to OEC of written procedures and practices in place regarding the review of current academic/functional data when writing IEPs.</p> <p>OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.</p>	<p><input checked="" type="checkbox"/> Yes</p> <p>A Corrective Action Plan is required due to meeting the 30% threshold of non-compliance.</p>
DS-3	300.320 (a)(2)(i)(A)	<p><u>Record Review</u></p> <p>Two school age and one preschool IEPs did not contain annual goals that address the child's academic area(s) of need.</p>	<p><u>Individual Correction</u></p> <p>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 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.</p>	<p><input checked="" type="checkbox"/> No</p> <p>The district does <u>not</u> need to address this finding in a Corrective Action Plan.</p>

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
			<p><u>Systemic Correction</u></p> <p>The district must submit evidence to OEC of written procedures and practices in place regarding the IEP process of addressing identified academic needs.</p> <p>OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.</p>	
DS-4	300.320(a)(2)(i) (A)	<p><u>Record Review</u></p> <p>Six school age and two preschool IEPs did not contain annual goals that address the child's functional area(s) of need.</p>	<p><u>Individual Correction</u></p> <p>The district must reconvene the IEP teams of the eight 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</p> <p><u>Systemic Correction</u></p> <p>The district must submit evidence to OEC of written procedures and practices in place regarding the IEP process of addressing identified functional needs.</p> <p>OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.</p>	<p><input checked="" type="checkbox"/> No</p> <p>The district does <u>not</u> need to address this finding in a Corrective Action Plan.</p>

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
DS-5	300.320(a)(2)(i)	<p><u>Record Review</u></p> <p>Fourteen school age and four preschool student IEPs did not contain measurable annual goals.</p>	<p><u>Individual Correction</u></p> <p>The district must reconvene the IEP teams of the eighteen IEPs identified as noncompliant to review and amend annual goals to contain the following six critical elements:</p> <ol style="list-style-type: none"> <li>1. Who?</li> <li>2. Will Do What?</li> <li>3. To What Level of Degree?</li> <li>4. Under What Conditions?</li> <li>5. In What Length of Time?</li> <li>6. How Will Progress Be Measured?</li> </ol> <p><u>Systemic Correction</u></p> <p>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:</p> <ol style="list-style-type: none"> <li>1. Who?</li> <li>2. Will Do What?</li> <li>3. To What Level of Degree?</li> <li>4. Under What Conditions?</li> <li>5. In What Length of Time?</li> <li>6. How Will Progress Be Measured?</li> </ol> <p>OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.</p>	<p><input checked="" type="checkbox"/> Yes</p> <p>A Corrective Action Plan is required due to meeting the 30% threshold of non-compliance.</p>
DS-6	300.320(a)(4)	<p><u>Record Review</u></p> <p>Twelve school age and six preschool IEPs did not contain a statement of specially designed instruction that addresses the needs of the child and supports annual goals.</p> <p><u>Interviews</u></p> <p>When asked about specially designed instruction during the interviews, it was obvious that much is being done, but not stated in the IEP.</p>	<p><u>Individual Correction</u></p> <p>The district must reconvene the IEP teams of the eighteen IEPs identified as noncompliant to review and amend the specially designed instruction to describe the adaption of, as appropriate to the needs of the child, the content, methodology, or delivery of instruction.</p> <p><u>Systemic Correction</u></p> <p>The district must submit evidence to OEC of written procedures and practices in place regarding the IEP process of determining specially designed instruction.</p> <p>OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.</p>	<p><input checked="" type="checkbox"/> Yes</p> <p>A Corrective Action Plan is required due to meeting the 30% threshold of non-compliance</p>

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
DS-7	300.320(a)(7)	<p><u>Record Review</u></p> <p>Fourteen school age and two preschool IEPs did not indicate the location where the specially designed instruction will be provided.</p>	<p><u>Individual Correction</u></p> <p>The district must reconvene the IEP teams of the sixteen IEPs identified as noncompliant to review and amend the location where the specially designed instruction will be provided.</p> <p><u>Systemic Correction</u></p> <p>The district must submit evidence to OEC of written procedures and practices in place regarding the IEP process of determining the location where specially designed instruction will occur.</p> <p>OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.</p>	<p><input checked="" type="checkbox"/> Yes</p> <p>A Corrective Action Plan is required due to meeting the 30% threshold of non-compliance.</p>
DS-8	300.320(a)(7)	<p><u>Record Review</u></p> <p>Three school age and two preschool IEPs did not indicate the amount of time and frequency of the specially designed instruction.</p>	<p><u>Individual Correction</u></p> <p>The district must reconvene the IEP teams of the five IEPs identified as noncompliant to review and amend the amount of time and frequency of the specially designed instruction.</p> <p><u>Systemic Correction</u></p> <p>The district must submit evidence to OEC of written procedures and practices in place regarding the IEP process of determining the amount and frequency of specially designed instruction to be provided.</p> <p>OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.</p>	<p><input checked="" type="checkbox"/> No</p> <p>The district does <u>not</u> need to address this finding in a Corrective Action Plan.</p>

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
DS-9	300.320(a)(4)	<p><u>Record Review</u></p> <p>Thirteen school age IEPs did not identify related services that address the needs of the child and support the annual goals.</p> <p>All preschool IEPs identified related services that address the needs of the child and support the annual goals.</p>	<p><u>Individual Correction</u></p> <p>The district must reconvene the IEP teams of the thirteen IEPs identified as noncompliant to review and amend the IEP to include related services that were identified as needed in the IEP.</p> <p><u>Systemic Correction</u></p> <p>The district must submit evidence to OEC of written procedures and practices in place regarding the IEP process of addressing identified related service needs.</p> <p>OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.</p>	<p><input checked="" type="checkbox"/> Yes</p> <p>A Corrective Action Plan is required due to meeting the 30% threshold of non-compliance.</p>
DS-10	300.320(a)(7)	<p><u>Record Review</u></p> <p>Seven school age IEPs did not indicate the location where the related services will be provided.</p> <p>All preschool IEPs indicated the location where the related services will be provided.</p>	<p><u>Individual Correction</u></p> <p>The district must reconvene the IEP teams of the seven IEPs identified as noncompliant to review and amend the IEP to include the location where the related services will be provided.</p> <p><u>Systemic Correction</u></p> <p>The district must submit evidence to OEC of written procedures and practices in place regarding the IEP process of determining the location where related services will occur.</p> <p>OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.</p>	<p><input checked="" type="checkbox"/> No</p> <p>The district does <u>not</u> need to address this finding in a Corrective Action Plan.</p>

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

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

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

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
LRE-1	300.324(a)(2)(v)	<p>Two preschool IEPs did not identify assistive technology to enable the child to be involved in and make progress in the general education curriculum.</p> <p>All school age IEPs identified assistive technology to enable the child to be involved in and make progress in the general education curriculum.</p>	<p><u>Individual Correction</u></p> <p>The district must reconvene the IEP teams of the two IEPs identified as noncompliant to review assistive technology and/or services that would directly assist the child with a disability to increase, maintain, or improve their functional capabilities and include them on the IEP.</p> <p><u>Systemic Correction</u></p> <p>The district must submit evidence to OEC of written procedures and practices in place regarding assistive technology.</p> <p>OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.</p>	<p><input checked="" type="checkbox"/> Yes</p> <p>A Corrective Action Plan is required due to meeting the 30% threshold of non-compliance.</p>
LRE-2	300.320(a)(6)(i)	<p><u>Record Review</u></p> <p>Four school age and two preschool IEPs did not identify accommodations provided to enable the child to be involved in and make progress in the general education curriculum</p>	<p><u>Individual Correction</u></p> <p>The district must reconvene the IEP teams of the six IEPs identified as noncompliant to review the accommodations that would directly assist the child to access the course content without altering the amount or complexity of the information taught and include them on the IEP.</p> <p><u>Systemic Correction</u></p> <p>The district must submit evidence to OEC of written procedures and practices in place regarding accommodations.</p> <p>OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.</p>	<p><input checked="" type="checkbox"/> No</p> <p>The district does <u>not</u> need to address this finding in a Corrective Action Plan.</p>

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
LRE-3	300.320(a)(4)	<u>Record Review</u> Five school age IEPs did not identify modifications to enable the child to be involved in and make progress in the general education curriculum.	<u>Individual Correction</u> The district must reconvene the IEP teams of the five 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.  <u>Systemic Correction</u> 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.	<input checked="" type="checkbox"/> No The district does <u>not</u> need to address this finding in a Corrective Action Plan.
LRE-4	300.320(a)(4)	<u>Record Review</u> All school age and preschool IEPs identified supports for school personnel to enable the child to be involved in and make progress in the general education curriculum.	<u>Individual Correction</u> None  <u>Systemic Correction</u> None	<input checked="" type="checkbox"/> NA

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
LRE-5	300.320(a)(5)	<p><u>Record Review</u></p> <p>Six school age IEPs did not include an explanation of the extent to which the child will not participate with nondisabled children in the regular education classroom.</p> <p>All preschool IEPs included an explanation of the extent to which the child will not participate with nondisabled children in the regular education classroom.</p> <p><u>Interviews</u></p> <p>According to those interviewed, there is not a continuum of services at all levels.</p> <p>Also, grade procedures for students with disabilities are different in different buildings.</p> <p>At the Middle School, there has been much turn-over with administration. Those interviewed believe that has hindered their ability to move forward with initiatives for students with disabilities.</p>	<p><u>Individual Correction</u></p> <p>The district must reconvene the IEP teams of the six IEPs identified as noncompliant to review and include a justification for why the child was removed from the regular education classroom.</p> <p>The justification should:</p> <ul style="list-style-type: none"> <li>• Be based on the needs of the child, not the disability.</li> <li>• Reflect that the team has given adequate consideration to meeting the student's needs in the regular classroom with supplementary aids and services.</li> <li>• 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.</li> <li>• Describe potential harmful effects to the child or others, if applicable.</li> </ul> <p><u>Systemic Correction</u></p> <p>The district must submit evidence to OEC of written procedures and practices in place regarding least restrictive environment placement decision process.</p> <p>OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.</p>	<input checked="" type="checkbox"/> No The district does <u>not</u> need to address this finding in a Corrective Action Plan.
LRE-6	300.321(1)	<p><u>Record Review</u></p> <p>All school age and preschool IEPs indicated that the IEP Team included a parent.</p>	<p><u>Individual Correction</u></p> <p>None</p> <p><u>Systemic Correction</u></p> <p>None</p>	<input checked="" type="checkbox"/> NA

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
LRE-7	300.321(2)	<p><u>Record Review</u></p> <p>One school age IEP did not indicate that the IEP Team included a regular education teacher.</p> <p>All preschool IEPs indicated that the IEP Team included a regular education teacher.</p>	<p><u>Individual Correction</u></p> <p>For the one IEP identified as noncompliant, the district must:</p> <ul style="list-style-type: none"> <li>• Provide documentation that the parent was informed prior to the IEP meeting that the regular education teacher would not participate in the meeting, <b>and</b></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, <b>or</b></li> <li>• Reconvene the IEP team to review the IEP will all required members present.</li> </ul> <p><u>Systemic Correction</u></p> <p>The district must submit evidence to OEC of written procedures and practices in place regarding regular education teacher involvement in the IEP process.</p> <p>OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.</p>	<input checked="" type="checkbox"/> No The district does <u>not</u> need to address this finding in a Corrective Action Plan.
LRE-8	300.321(3)	<p><u>Record Review</u></p> <p>All school age and preschool student IEPs indicated that the IEP Team included a special education teacher.</p>	<p><u>Individual Correction</u></p> <p>None</p> <p><u>Systemic Correction</u></p> <p>None</p>	<input checked="" type="checkbox"/> NA

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
LRE-9	300.321(4)	<p><u>Record Review</u></p> <p>Three school age IEPs did not indicate that the IEP Team included an LEA representative.</p> <p>All preschool IEPs indicated that the IEP Team included an LEA representative.</p>	<p><u>Individual Correction</u></p> <p>For the three IEPs identified as noncompliant, the district must:</p> <ul style="list-style-type: none"> <li>• Provide documentation that the parent was informed prior to the IEP meeting that the LEA representative would not participate in the meeting, <b>and</b></li> <li>• Provide a written excuse signed by the parents and the district that allowed the LEA representative not to be in attendance at the IEP meeting, <b>or</b></li> <li>• Reconvene the IEP team to review the IEP will all required members present.</li> </ul> <p><u>Systemic Correction</u></p> <p>The district must submit evidence to OEC of written procedures and practices in place regarding LEA representative involvement in the IEP process.</p> <p>OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.</p>	<input checked="" type="checkbox"/> No The district does <u>not</u> need to address this finding in a Corrective Action Plan.
LRE-10	300.321(5)	<p><u>Record Review</u></p> <p>All school age and preschool IEPs indicated that the IEP Team included of a person qualified to interpret the instructional implications of evaluation results.</p>	<p><u>Individual Correction</u></p> <p>None</p> <p><u>Systemic Correction</u></p> <p>None</p>	<input checked="" type="checkbox"/> NA

#### Component 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	Must be addressed in CAP
			Required Actions	
DV-1	300.645 R.C. 3301.07.14	<u>Record Review</u> All school age and preschool IEPs indicated that the child did have an IEP in effect as reported on the LEA's December 1, 2010 Child Count Report.	<u>Individual Correction</u> None <u>Systemic Correction</u> None	<input checked="" type="checkbox"/> NA
DV-2	300.645 R.C. 3301.07.14	<u>Record Review</u> All school age and preschool ETRs indicated that the child did have an ETR in effect as reported on the LEA's December 1, 2010 Child Count Report.	<u>Individual Correction</u> None <u>Systemic Correction</u> None	<input checked="" type="checkbox"/> NA
DV-3	SPP Indicator 20: Accurate and Timely Reporting of Special Education Event Record	<u>Record Review</u> One school age record had inaccurate 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	<u>Individual Correction</u> The district must provide evidence that they corrected the student data through their Student Information System (SIS). <u>Systemic Correction</u> 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.	<input checked="" type="checkbox"/> No The district does <u>not</u> need to address this finding in a Corrective Action Plan.

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
DV-4	SPP Indicator 11 300.301(c)(1)(i)	<u>Record Review</u> All school age and preschool student initial evaluations reported as being conducted within 60 days of the district receiving parental consent for the evaluation was conducted within the required timeline.	<u>Individual Correction</u> None <u>Systemic Correction</u> None	<input checked="" type="checkbox"/> NA
DV-5	SPP Indicator 12 300.124	<u>Record Review</u> All preschool IEPs did show 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.	<u>Individual Correction</u> None <u>Systemic Correction</u> None	<input checked="" type="checkbox"/> NA
DV-6 A/B	SPP Indicator 20 for Secondary Transition Plans	<u>Record Review</u> Five 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.	<u>Individual Correction</u> OEC has verified that two of the five students have current IEPs that contain transition plans that meet all 8 required elements of IDEA, so no additional individual correction is required. Three current IEPs <b>did not</b> 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 three records identified as still noncompliant or provide documentation of the student's withdrawal date. <u>Systemic Correction</u> 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	<input checked="" type="checkbox"/> Yes A Corrective Action Plan is required due to meeting the 30% threshold of non-compliance.

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

**Component 1: Statement of Accounts**

*The district/school has submitted its FY11 FERs for IDEA – ARRA funds and IDEA Pre-School ARRA funds. The Financial Detail (FINDET) Report for those funds and the Final Expenditure Reports are consistent and in agreement. The fiscal reports are evidence that ensure that district children with disabilities have available to them a free appropriate public education (FAPE) that emphasizes special education and related services designed to meet their unique needs.*

Findings Citation	Evidence	Evidence of Correction		Must be addressed in CAP
		Required Actions	Date Due	
300.202	<p>The documentation provided by the district for fund 516 special cost center 9320 (ARRA) and the CCIP FER matched in all categories.</p> <p>The documentation provided by the district for fund 516 and 587 FY12 regular is in line with the current budgets in the CCIP – there were no deviations or issues.</p>	<p><u>Individual Correction</u> None</p> <p><u>Systemic Correction</u> None</p>		<input checked="" type="checkbox"/> 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	<p>Six employees were paid from Fund 516, special cost center 9320. Four of the six employee's payroll function codes were incorrect: two aides were coded to 2214; the more appropriate code would be 2215 – classroom support - special education aides. Lisa Gibbons was coded to 1110, Regular Instruction Elementary. Elementary teachers paid from fund 516 must perform special education related services, be licensed appropriately and be coded to the 1230 - Handicapped Special Learning Experiences for K through Grade-6 series. Amy Tomons was coded to function code 1140, alternative school. Per the guidance above if Ms. Tomons is serving special education students she should be coded to function code series 1230 or 1240 depending on the grade level she serves.</p> <p>The six employees paid from fund 516, 9320 were properly licensed for the duties they perform. Position descriptions were provided for each position paid from this fund and semi-annual certifications were provided for review.</p> <p>There were no expenditures against Fund 587, special cost center 9320.</p> <p>No employees are paid from fund 516 regular in FY12.</p> <p>One employee is paid from fund 587 regular in FY12. The payroll coding is correct per the USAS manual. The teacher's licensing is appropriate and current. A position description was provided for the teacher. The district produced the FY11 semi-annual certifications for my review.</p>	<p><u>Individual Correction</u></p> <p>The district will correct the function code errors identified in fund 516, special cost center 9320 that were entered 7-1-11 to 9-30-11. The coding errors that were entered prior to 7-1-11 do not require individual correction as the year has ended and the books should be closed.</p> <p>Function code errors can negatively impact a district's maintenance of effort calculation with respect to non-federal fund coding. OEC recommends the district review all FY12 local fund coding for special education services to ensure the staff are properly coded to special education related instruction and support function codes.</p> <p><u>Systemic Correction</u></p> <p>The district will create a process document detailing how it will ensure the proper use of USAS function codes for special education funding. The district will provide a copy of the process document.</p>	<p>Individual Correction for Fiscal Requires the following due date:</p> <p>*30 days from receipt of this report.</p>	<p><input checked="" type="checkbox"/> Yes</p>

### 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	<p>Fund 516, special cost center 9320: OEC selected 11 voucher packets for onsite review. Of the 11 reviewed 5 incorrectly applied function code 1190 – Other Regular Instruction to special education activities. If the purchases were for special education instruction, the district should select the appropriate code from series 1230 and/or 1240, depending on the grade levels supported. If the purchases were for early intervening services, then the district should apply function code 1920 – Student Intervention Services. The voucher numbers are: 82190, 82215, 82466, 83820, and 85314.</p> <p>Three vouchers were coded function 1290 – Other special. While this is not wrong, function codes from series 1230 and 1240 would be more appropriate.</p> <p>Vouchers – 84255, 84352 and 84671 coded supply purchases to object 516- Software Material: Expenditures for software programs (not used for educational purposes). The district will review these purchases to determine if the software was actually for educational purposes, if so the object codes should have been 525 Electronic Instructional Materials and Supplies</p> <p>Fund 516, FY12 Regular IDEA: OEC selected 10 voucher packets for onsite review. Of the 11 reviewed 4 incorrectly applied function codes. Voucher 85591 applied function 1190 – Other Regular Instruction to special education activities. If the purchase was for special education instruction the district should select the appropriate code from series 1230 and/or 1240, depending on the grade levels supported. If the purchase was for early intervening services then the district should</p>	<p><u>Individual Correction</u></p> <p>Fund 516, special cost center 9320, the district will correct errors associated with vouchers processed against this fund and SCC after 7-1-11.</p> <p>Fund 516, FY12 Regular, the district will correct the errors identified in the evidence column, and will review the expenditures to date for similar errors and correct them as well.</p> <p>Function code errors can negatively impact a district's maintenance of effort calculation with respect to non-federal fund coding. OEC recommends the district review all FY12 local fund coding for special education services to ensure the expenditures are properly coded to special education related instruction and support function codes.</p> <p><u>Systemic Correction</u></p> <p>The district will create a process document detailing how it will ensure the proper use of USAS function codes for special education funding. he district will provide a copy of the process document and a FINDET for fund 516 for FY12 as evidence of correction.</p>	<p>Individual Correction for Fiscal Requires the following due date:</p> <p>*30 days from receipt of this report.</p>	<p><input checked="" type="checkbox"/> Yes</p>

Findings Citation	Evidence	Evidence of Correction		Must be addressed in CAP
		Required Actions	Date Due	
	<p>apply function code 1920 – Student Intervention Services. Voucher 85522 coded preschool testing materials to function code 1231. Per a discussion with Ms. Moles, the correct function code is 1280-Preschool.</p> <p>Vouchers 85206 and 85434 coded service for family and parent engagement services to function 2413-State and Federal Projects Coordination Services. Per USAS function 2176 -Family and Community Liaison Services - Those activities associated with the coordination of school services with families and community organizations would be a more appropriate code to apply.</p> <p>There were no expenditures against fund 587 FY12 regular or special cost center 9320.</p> <p>100% of the expenditures reviewed were appropriate uses of the funds.</p> <p>The special education director shared copies of the MOUs for students placed out of the district.</p>			

**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	Voucher 83820, Rifton Equipment, provided a dynamic stander. This item should have been on the inventory master listing, it was not.	<p><u>Individual Correction</u></p> <p>The dynamic stander will be added to the district master inventory list.</p> <p><u>Systemic Correction</u></p> <p>None</p>	<p>Individual Correction for Fiscal Requires the following due date:</p> <p>*30 days from receipt of this report.</p>	<input checked="" type="checkbox"/> No

**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	<p>The district provided an inventory master listing report. The report contained 12 items identified as being purchased with fund 516, special cost center 932N, dollars. The district identified the teachers and rooms where the equipment was recorded as being located. Eleven of the items were CPS Pulse Teacher Mobile – referred to as mobi’s. The master listing recorded the tag number as 003757. Thirty three (33) mobi’s were located, none of the mobi’s were coded in the 3700 series, the tags ranged from 002522-2539, 002688 and 002691, 002711-2731, and 004632-4634. None of the mobi tags matched.</p> <p>In addition, one Rack Mount Appliance was found but not tagged per the master listing sheet and district inventory procedure in the administrative guidelines.</p>	<p><u>Individual Correction</u> None</p> <p><u>Systemic Correction</u> The district will conduct a review of their special education funded equipment to correct the issues identified in the evidence column. This will include reviewing prior year financial detail reports to locate items coded to object category 600 to ensure items from prior years are properly inventoried. The district will show evidence of correction along with an explanation of the circumstances contributing to the errors. The district will develop a plan to ensure errors of this nature do not occur in the future.</p>		<input checked="" type="checkbox"/> Yes

**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	Garfield Heights City Schools record: the number of children evaluated; the number of children determined to be SWD; the number of children served; and held timely consultation with NP as noted in the NS3 documentation  The district is properly tracking expenditures made on behalf of the non-publics by utilizing function code 3260.	<u>Individual Correction</u> None  <u>Systemic Correction</u> None		<input checked="" type="checkbox"/> NA

**Component 7: Notification of Public Participation**

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

Findings Citation	Evidence	Evidence of Correction		Must be addressed in CAP
		Required Actions	Date Due	
300.165 and Part 300.201	The district was unaware of this requirement; they did not hold a meeting or notify the public.	<u>Individual Correction</u> None  <u>Systemic Correction</u> 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.		<input checked="" type="checkbox"/> Yes

**Component 8: Redirection of funds**

*If the district/school has redirected funds for CEIS, it is able to document the expenditures related to CEIS and to validate that the percent of the IDEA funds used for CIES is 15% or less of total allocation, to document the number of students who were served and are able to track and report on the number of students who subsequently received special education services.*

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

Findings Citation	Evidence	Evidence of Correction		Must be addressed in CAP
		Required Actions	Date Due	
300.205	<p>Per the CCIP redirection page the district redirected \$134,225 of their FY12 total fund 516 and 587 allocation. \$49,179 for professional development and \$85,046 for educational/behavioral evaluations services and supports.</p> <p>When asked for details regarding this CEIS budget the special education coordinator was unsure. In addition, the district has not established a process to track expenditures of this nature separate from special education expenditures. OEC suggested the district utilize function code 1920- student intervention services as well as develop a job code to track the expenditures as an extra precaution.</p> <p>The district entered in the CCIP that 75 children were served by CEIS in the prior year and none were later identified as SWD. The special education coordinator indicated that 75 seemed high.</p>	<p><u>Individual Correction</u></p> <p>None</p> <p><u>Systemic Correction</u></p> <p>The special education coordinator, federal grants coordinator and the treasurer or his designee will meet to review the CEIS budget entered in the CCIP. During this meeting, the district will determine if the budget entered is valid. If it is, the district will provide an explanation of the specific services to be provided. If it is determined the figure as presented in the CCIP does not have a valid plan associated with it, the district will develop a plan and submit it for review.</p> <p>In addition, the district will develop a formal policy/process document for the development, approval and tracking of funding set aside for CEIS and the students served.</p>	<p>Systemic issues are usually given one year from approval of the cap to address the issues. Given the nature of this systemic issue I am asking that this be addressed before the end of the school year.</p>	<p><input checked="" type="checkbox"/> Yes</p>

## 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 8, 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?*

Citation	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
		Required Actions	
<b>ORC 3306.09(G)</b>	<p>The district is not meeting this requirement as continued in Am. Sub. HB 153. In FY09, the district received \$39,318.75 in state gifted unit funds. The district has not met the requirement to 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.</p> <p>In FY09, the district also contracted with the ESC for a part-time gifted coordinator. The district is meeting the requirement related to option (a) by maintaining the part-time gifted coordinator with the ESC.</p>	<p><u>Individual Correction</u></p> <p>None</p> <p><u>Systemic Correction</u></p> <p>The district must describe in the corrective action plan the process to become compliant with this requirement. The plan must address how services related to this requirement will be implemented beginning with the 2012-2013 school year.</p>	<input checked="" type="checkbox"/> 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?

Citation	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
		Required Actions	
<b>OAC 3301-51-15(D)(4)</b>	This component does not apply. This district does not provide gifted services.	<u>Individual Correction</u> N/A <u>Systemic Correction</u> N/A	<input checked="" type="checkbox"/> 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.

Citation	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
		Required Actions	
<b>ORC 3324.06(D)</b>	This component does not apply. The district does not provide gifted services.	<u>Individual Correction</u> N/A <u>Systemic Correction</u> N/A	<input checked="" type="checkbox"/> NA

**Component 4: Acceleration and Attestation**

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

Citation	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
		Required Actions	
<b>ORC 3324.10</b>	The district provided evidence that they have implemented their acceleration policy. They have made a commitment to use the Iowa Acceleration Scale in future whole grade accelerations and early entrance accelerations.	<u>Individual Correction</u> None <u>Systemic Correction</u> None	<input checked="" type="checkbox"/> NA

**Component 5: Gifted Intervention Specialists and Attestation**

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

Citation	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
		Required Actions	
<b>OAC 3301-51-15(E)(2)</b>	This component does not apply. The district does not provide gifted services.	<u>Individual Correction</u> N/A <u>Systemic Correction</u> N/A	<input checked="" type="checkbox"/> NA

**Component 6: Licensure Attestation**

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

Citation	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
		Required Actions	
<b>OAC 3301-51-15(E)(3), OAC 3301-51-15(E)(6)</b>	The gifted coordinator holds the appropriate licensure or endorsement for the position.	<u>Individual Correction</u> None <u>Systemic Correction</u> None	<input checked="" type="checkbox"/> NA

**Component 7: Requirement for Minutes of Service Attestation**

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

Citation	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
		Required Actions	
OAC 3301-51-15(E)	This component does not apply. The district does not provide gifted services.	<u>Individual Correction</u> N/A <u>Systemic Correction</u> N/A	<input checked="" type="checkbox"/> 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?*

Citation	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
		Required Actions	
OAC 3301-51-15(D)(3)(b)(i)	This component does not apply. The district does not provide gifted services.	<u>Individual Correction</u> N/A <u>Systemic Correction</u> N/A	<input checked="" type="checkbox"/> NA