

Genoa Area School District IRN 048942
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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 November 8, 9 and 10, 2011 by the Ohio Department of Education's Office for Exceptional Children (OEC) and Office of Early Learning and School Readiness 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 November 8, 9, and 10, 2011. 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 October 25, 2011, Genoa Area Schools mailed 143 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 October 25, 2011 on the district web site.

On November 8, 2011, 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. Eight parents and one tutor attended the meeting. Because of a home emergency, no State Support Team (SST) Region 1 representative attended the public meeting. Attendees could speak to OEC representatives publicly in the meeting or individually, provide written comments, or both. All parents

and the tutor made comments during the public meeting. Written comment forms were available before, during and after the meeting. OEC received no written comments.

During the public meeting, parents were advised by OEC consultants of the formal complaint process under IDEA and that their public comments did not constitute a formal complaint. The participants were also informed that while the information they provided may be helpful to the review, it may not necessarily be acted upon as part of the review process. "Whose IDEA Is This?" Ohio's procedural safeguards notice, was available for participants who wanted a copy.

2. Pre-Onsite Data Analysis

OEC consultants reviewed district, building and grade level data. District data analyzed included the Special Education Performance Profile, Local Report Cards, and Education Management Information System (EMIS) data. The data analysis assists OEC in determining potential growth areas and district strengths.

3. Record Review

On November 8 and 9, 2011, OEC consultants reviewed thirty-one records of school age students with disabilities. An OELS&R consultant reviewed six records November 10, 2011 as part of the Early Childhood Special Education Review. OEC selected records of a variety of children with disabilities from two buildings.

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

4. Staff/Administrative Interviews

On November 10, 2011, OEC consultants held three sessions of interviews with six administrators and thirteen teachers 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 Genoa Area 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 lcesc_ks@sstr1.org within 30 school days from the date of this report. OEC will review the action plan submitted by the district for approval. If OEC deems that a revision(s) is necessary, the district will be required to revise and resubmit. The district will be contacted by the OEC Lead Consultant and notified when the action plan has been approved.

CAP Due Date: March 09, 2012

Individual Correction

The district has 60 school days from 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: April 20, 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: January 25, 2013

For questions about specific components of this report please contact:

- **Special Education School Age:** Karla Spangler, OEC Lead Consultant, at (419)707-0279, toll-free at (877) 644-6338, or by e-mail at lcesc_ks@sstr1.org .
- **Special Education Early Childhood:** Barbara Weinberg, Educational Consultant, at (614) 387-2239, toll-free at (877) 644-6338, or by e-mail at Barbara.Weinberg@ode.state.oh.us.
- **Fiscal:** Stephanie Ferrell, Educational Consultant, at (614)752-1249, toll-free at (877) 644-6338, or by e-mail at stephanie.ferrell@ode.state.oh.us.
- **Gifted Education:** Rosemary Pearson, Educational Consultant, at (614) 644-2641, toll-free at (877) 644-6338, or by e-mail at rosemary.pearson@ode.state.oh.us.

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 reevaluation record(s) indicated that the child's reevaluation was not completed within the three year timeline.</p>	<p><u>Individual Correction</u></p> <p>OEC has verified that these student(s) 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 the 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 record(s) 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> One school age initial evaluation did not appropriately document interventions provided to resolve concerns for the child performing below grade-level standards.</p>	<p><u>Individual Correction</u> OEC has verified that this student has a current IEP in place, so no additional individual correction is required.</p> <p><u>Systemic Correction</u> 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>	<p><input checked="" type="checkbox"/> No The district does <u>not</u> need to address this finding in a Corrective Action Plan.</p>
CF-4	300.501(b)(1)	<p><u>Record Review</u> One school age record did not show evidence that the evaluation planning team included the parent.</p> <p>All preschool records showed evidence that parents were included.</p>	<p><u>Individual Correction</u> 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> 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>	<p><input checked="" type="checkbox"/> No 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	
CF-5	300.305(a)(1)	<p><u>Record Review</u></p> <p>One school age evaluation 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>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>All school age evaluations provided evidence that the evaluation planning team identified what additional data, if any, was needed.</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>
CF-7	300.304(c)(4); OAC 3301-51-01; and OAC 3301-51-06	<p><u>Record Review</u></p> <p>One school age evaluation did not provide evidence that the evaluation addresses all areas related to the suspected disability.</p> <p>All preschool evaluations covered all required domains.</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>	<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	
CF-8	300.306(a)(1)	<p><u>Record Review</u> One school age record 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 parents of the child were involved in determining whether the child is a child with a disability.</p>	<p><u>Individual Correction</u> 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> 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.</p>	<input checked="" type="checkbox"/> No The district does <u>not</u> need to address this finding in a Corrective Action Plan.
CF-9	300.306(a)(1)	<p><u>Record Review</u> All school age and preschool 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> None</p> <p><u>Systemic Correction</u> None</p>	<input checked="" type="checkbox"/> NA
CF-10	300.306(a)(1); 300.305(a); and 3301-51-01 (B)(21)	<p><u>Record Review</u> All school age and 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> None</p> <p><u>Systemic Correction</u> None</p>	<input checked="" type="checkbox"/> NA

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> Four school age and one preschool IEP did not address how the child's disability affects his/her involvement and progress in the general education curriculum.</p> <p><u>Interviews</u> Interviews with the staff revealed that there is not a continuum of services available for all students with disabilities.</p> <p>Also, when students return from an alternative setting, such as a behavioral setting, there is not a program provided to allow for gradual return to the general education classroom.</p> <p><u>Other Considerations</u> The result of this item does not rise to the 30% threshold used for an action in the corrective action plan. But, with the lack of concrete evidence to assure that students with disabilities are being successful in the general education classroom, a CAP activity is warranted.</p>	<p><u>Individual Correction</u> The district must reconvene the IEP team(s) of the five IEP(s) 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> 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 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>Eleven school age IEP(s) did not contain Present Levels of Academic Achievement and Functional Performance (PLOP) that addressed the needs of the student.</p> <p>All preschool student IEP(s) did contain PLOP that addressed the needs of the student.</p>	<p><u>Individual Correction</u></p> <p>The district must reconvene the IEP team(s) of the eleven IEP(s) identified as noncompliant to review and amend the PLOP related to each goal to include:</p> <ul style="list-style-type: none"> • A summary of current daily academic/behavior and/or functional performance (strengths and needs); • Baseline data provided for developing a measurable goal. • For preschool, the PLOP should relate to the child's developmental domains, functional performance and pre-academic skills. <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>Six school age IEP's did not contain annual goals that address the child's academic area(s) of need.</p> <p>All preschool student IEPs contained 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 team(s) of the six IEP(s) 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><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>	<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-4	300.320(a)(2)(i) (A)	<p><u>Record Review</u></p> <p>Eight school age IEP(s) did not contain annual goals that address the child's functional area(s) of need.</p> <p>All preschool IEPs contained 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 team(s) of the eight IEP(s) 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>
DS-5	300.320(a)(2)(i)	<p><u>Record Review</u></p> <p>Ten school age and three preschool IEP(s) did not contain measurable annual goals.</p>	<p><u>Individual Correction</u></p> <p>The district must reconvene the IEP team(s) of the sixteen IEP(s) identified as noncompliant to review and amend annual goals to contain the following six critical elements:</p> <ol style="list-style-type: none"> 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? <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"> 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? <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-6	300.320(a)(4)	<p><u>Record Review</u></p> <p>Ten school age and six preschool IEP(s) did not contain a statement of specially designed instruction that addresses the needs of the child and supports annual goals.</p>	<p><u>Individual Correction</u></p> <p>The district must reconvene the IEP team(s) of the sixteen IEP(s) 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>
DS-7	300.320(a)(7)	<p><u>Record Review</u></p> <p>Ten school age and one preschool student IEP(s) 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 team(s) of the eleven IEP(s) 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>

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
DS-8	300.320(a)(7)	<p><u>Record Review</u></p> <p>Ten school age IEP(s) did not indicate the amount of time and frequency of the specially designed instruction.</p> <p>All preschool IEPs contained the location where the specially designed instruction will be provided.</p>	<p><u>Individual Correction</u></p> <p>The district must reconvene the IEP team(s) of the ten IEP(s) 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"/> Yes</p> <p>A Corrective Action Plan is required due to meeting the 30% threshold of non-compliance.</p>
DS-9	300.320(a)(4)	<p><u>Record Review</u></p> <p>Four school age IEP(s) 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 annual goals.</p>	<p><u>Individual Correction</u></p> <p>The district must reconvene the IEP team(s) of the four IEP(s) 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"/> 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-10	300.320(a)(7)	<p><u>Record Review</u></p> <p>Seven school age IEP(s) 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 team(s) of the seven IEP(s) 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"/> Yes</p> <p>A Corrective Action Plan is required due to meeting the 30% threshold of non-compliance.</p>
DS-11	300.320(a)(7)	<p><u>Record Review</u></p> <p>Three school age IEP(s) did not indicate the amount of time and frequency of the related services to be provided.</p> <p>All preschool IEPs indicated the amount of time and frequency of the related services to be provided.</p>	<p><u>Individual Correction</u></p> <p>The district must reconvene the IEP team(s) of the three IEP(s) identified as noncompliant to review and amend on the IEP the amount of time and frequency of the related services to 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 amount and frequency of related services 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>

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><u>Record Review</u></p> <p>One school age IEP did not identify assistive technology to enable the child to be involved in and make progress in the general education curriculum.</p> <p>There was no preschool student IEP in which assistive technology was listed.</p>	<p><u>Individual Correction</u></p> <p>The district must reconvene the IEP team of the one IEP 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>Three school age IEP(s) did not identify accommodations provided to enable the child to be involved in and make progress in the general education curriculum</p> <p>There was no preschool IEP in which accommodations were not listed.</p>	<p><u>Individual Correction</u></p> <p>The district must reconvene the IEP team(s) of the three IEP(s) 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)	<p><u>Record Review</u></p> <p>Seven school age IEP(s) did not identify modifications to enable the child to be involved in and make progress in the general education curriculum.</p> <p>There were no preschool IEPs in which modifications were listed.</p>	<p><u>Individual Correction</u></p> <p>The district must reconvene the IEP team(s) of the seven IEP(s) 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.</p> <p><u>Systemic Correction</u></p> <p>The district must submit evidence to OEC of written procedures and practices in place regarding modifications.</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-4	300.320(a)(4)	<p><u>Record Review</u></p> <p>One school age and one preschool IEP(s) did not identify supports for school personnel 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 team(s) of the two IEP(s) 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.</p> <p><u>Systemic Correction</u></p> <p>The district must submit evidence to OEC of written procedures and practices in place regarding supports for school personnel.</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	
LRE-5	300.320(a)(5)	<p><u>Record Review</u></p> <p>Nine school age IEP(s) 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, when applicable, the extent to which each child will not participate with nondisabled children in the regular education classroom.</p> <p><u>Interviews</u></p> <p>Staff commented that there is not a continuum of services provided to students with disabilities.</p> <p><u>Other Considerations</u></p> <p>See DS 1.</p>	<p><u>Individual Correction</u></p> <p>The district must reconvene the IEP team(s) of the nine IEP(s) 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"> • 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. <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>	<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	
LRE-6	300.321(1)	<p><u>Record Review</u></p> <p>One school age IEP did not indicate that the IEP Team included a parent.</p> <p>All preschool IEP Teams included a parent.</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"> • Provide evidence of parent participation at the IEP meeting, or • Provide documentation of at least three attempts made by the district to ensure parent participation, or • Reconvene the IEP team to review the IEP with the parent. <p><u>Systemic Correction</u></p> <p>The district must submit evidence to OEC of written procedures and practices in place regarding parent 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 <p>The district does <u>not</u> need to address this finding in a Corrective Action Plan.</p>
LRE-7	300.321(2)	<p><u>Record Review</u></p> <p>Two school age and two preschool IEP(s) did not indicate that the IEP Team included a regular education teacher.</p>	<p><u>Individual Correction</u></p> <p>For the four IEP(s) identified as noncompliant, the district must:</p> <ul style="list-style-type: none"> • Provide documentation that the parent was informed prior to the IEP meeting that the regular education teacher would not participate in the meeting, and • Provide a written excuse signed by the parents and the district that allowed the regular education teacher not to be in attendance at the IEP meeting, or • Reconvene the IEP team to review the IEP will all required members present. <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 <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-8	300.321(3)	<p><u>Record Review</u></p> <p>One school age and three preschool student IEP(s) did not indicate that the IEP Team included a special education teacher.</p>	<p><u>Individual Correction</u></p> <p>For the four IEP(s) identified as noncompliant, the district must:</p> <ul style="list-style-type: none"> • Provide documentation that the parent was informed prior to the IEP meeting that the special education teacher would not participate in the meeting, and • Provide a written excuse signed by the parents and the district that allowed the special education teacher not to be in attendance at the IEP meeting, or • Reconvene the IEP team to review the IEP will all required members present. <p><u>Systemic Correction</u></p> <p>The district must submit evidence to OEC of written procedures and practices in place regarding special 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>	<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>
LRE-9	300.321(4)	<p><u>Record Review</u></p> <p>Two school age IEP(s) did not indicate that the IEP Team included an LEA representative.</p> <p>All preschool IEP Teams included an LEA representative.</p>	<p><u>Individual Correction</u></p> <p>For the two IEP(s) identified as noncompliant, the district must:</p> <ul style="list-style-type: none"> • Provide documentation that the parent was informed prior to the IEP meeting that the LEA representative would not participate in the meeting, and • Provide a written excuse signed by the parents and the district that allowed the LEA representative not to be in attendance at the IEP meeting, or • Reconvene the IEP team to review the IEP with all required members present. <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>	<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-10	300.321(5)	<p><u>Record Review</u></p> <p>One school age IEP did not indicate that the IEP Team included a person qualified to interpret the instructional implications of evaluation results.</p> <p>All preschool IEP Teams included a person qualified to interpret the instructional implications of evaluation results.</p>	<p><u>Individual Correction</u></p> <p>For the one IEP(s) identified as noncompliant, the district must:</p> <ul style="list-style-type: none"> • 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 with all required members present. <p><u>Systemic Correction</u></p> <p>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.</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 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 all preschool IEP(s) 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 all 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> Three school age and one preschool record had inaccurate student data reported by the LEA through the Education Management Information System (EMIS) for the December 1, 2010 Child County 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 all preschool initial evaluation(s) reported as being conducted within 60 days of the district receiving parental consent for the evaluation were 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 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.	<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 IEP(s) did not show evidence that the secondary transition plan reported in EMIS during 2010-2011 was in place that meets all eight required elements of IDEA for the student, specifically in the following area(s): <ol style="list-style-type: none"> 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 four student(s) have current IEP(s) that contain transition plans that meet all eight required elements of IDEA, so no additional individual correction is required. One current IEP(s) did not contain transition plans that meet all 8 required elements of IDEA. The district must reconvene the IEP team to review and correct the secondary transition plan for the one record 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

District/School has submitted its FY10 FER for IDEA Part B and IDEA Pre-School funds and ARRA funds. The Financial Detail (FinDet) report and Accounting History (AccRpt) 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	
300.202	<p>The FER for FY11 fund 516, Special Cost Center 9320 matched the FINDET provided by Genoa Area Local.</p> <p>The FY12 fund 516 expenditures to date are in line with the budget in the CCIP. The expenditures were accounted for in the correct budget categories.</p> <p>The district participates in a consortium with the North Point ESC. The FER for FY11 fund 587, Special cost center 9320 matched the FINDET provided by North Point ESC.</p> <p>The FY12 fund 587 expenditures to date are in line with the budget in the CCIP.</p>	<p><u>Individual Correction</u> None</p> <p><u>Systemic Correction</u> None</p>	<input checked="" type="checkbox"/> NA

Component 2: Payroll Expenditures

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; districts ACCRPT and FER are in agreement.

Findings Citation	Evidence	Evidence of Correction		Must be addressed in CAP
		Required Actions	Date Due	
300.202	<p>The ACCRPT for fund 516 ARRA was reviewed for the time period spanning July 1, 2010 to September 30, 2011. The ACCRPT for fund 516 regular IDEA for school year 2011-2012 was reviewed as well. Both years had the same issues.</p> <p>They are as follows:</p> <ol style="list-style-type: none"> 1) The function code for the special education director was incorrectly applied; the district used code 2421, Office of the Principal Services. The appropriate code is 2416 Special Education Services - Administrative/Supervisors. 2) The function coding for the middle school intervention specialist was coded to 1241, which is fine for work performed with grades 7 and 8. For work performed with grade 6 the correct function code would be 1231. 3) The function code for the elementary school intervention specialist was incorrectly applied to grade 7-14 function code 1241; the correct code would be 1231. <p>Semi-annual certifications were not provided for staff paid 100% from fund 516 ARRA and regular. The district was unaware of this requirement.</p> <p>The special education director performed non-special education related activities in FY11. He was paid 80% IDEA and 20% local funds. A Time and Effort log should have been completed to track the amount of time spent on each activity.</p>	<p><u>Individual Correction</u></p> <p>The district will correct, for school year 2011-2012, the errors identified regarding staff function codes. In addition, the district will review the local fund expenditures for special education to ensure the correct function codes are applied to those expenditures as well. The district will correct any errors they identify no matter the funding source and show evidence of correction.</p> <p>The district will implement appropriate time and effort tracking immediately for staff paid from multiple funding sources who serve multiple student populations or school district functions.</p> <p><u>Systemic Correction</u></p> <p>The district will institute a process to ensure staff are aware and are compliant with the requirements related to OMB Circular A-87 Attachment B (8)(h).</p> <p>Due to the regulation cited, it is required to provide time and effort documentation for any employee which is paid from more than one source. This time and effort documentation must be contemporaneous and reflective of actual hours worked. A special system designed to meet this requirement is not required if the local entity can provide clear, concise and unambiguous documentation that the standard was met.</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>Staffs paid from this fund are properly certified for the positions they fill.</p> <p>Additional guidance regarding coding for grade level – If there are children with varied disability conditions in the classroom, and the classroom spans both the elementary and secondary categories above (for example, grades 6-8), the teacher’s salary code should be prorated to reflect the grade level for the majority of the students in the class.</p> <p>North Point ESC does not utilize fund 587 dollars to support Preschool special education teachers in Genoa. They did provide current and appropriate licenses for the teachers supporting Genoa even though they are not paid from 587. No semi-annual or time and effort logs were reviewed because they were not applicable for fund 587 in either fiscal year.</p>	<p>The link below provides an example of an acceptable time and effort log as well as the complete guidance from ODE’s office of Grants Management: http://www.education.ohio.gov/GD/Templates/Pages/ODE/ODEDetail.aspx?Page=3&TopicRelationID=87&Content=107329</p> <p>Additional information, from the GM guidance:</p> <p>Q8: At the beginning of the year, the district treasurer sets up funding percentages in the district’s payroll system for each employee which is split funded. These percentages are based on the budget submitted and approved by ODE. Does the district need to reconcile and adjust the beginning of the year funding percentages to reflect the actual time spent on the grants as indicated in the time and effort documentation?</p> <p>A8: Yes. Not less than once per quarter, reconciliation between estimated and actual amounts must be performed to ensure that the correct actual charges are reflected on the district’s financial records. It is critical to note that the funding percentages set up at the beginning of the grant period are estimates and may require adjustment based on actual data from the time and effort documentation.</p> <p>The district will provide evidence of implementation within one year from the date of their CAP approval.</p>		

Component 3: Non-Payroll Expenditures

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>17 voucher packets and/ or journal correction documents were reviewed for Fund 516 special cost center 932O (ARRA- FY11). 15 of the 17 had function code errors. 100% of the supply and equipment purchases for ARRA per the FINDETS provided were incorrectly coded to function code 1110, Elementary general education and 1130, High School general education.</p> <p>100% of the bus purchased in FY10 was coded to FY11 ARRA. The district could not explain why this was changed from the year the order was placed. The bus is used by the district to transport two special education students. The remainder of the time the bus is used to transport general education students.</p> <p>Per ODE's position on vehicles purchased with IDEA part B and IDEA part B ARRA funds :</p> <ol style="list-style-type: none"> 1) If a bus is purchased wholly with IDEA funds, the bus may not be used for any other purpose, including during or after school, for substitute bus routes, or team events that are not specifically related to special education programming. 2) If a vehicle is purchased to meet the needs of one or two or more students who need transportation services, but on the same bus route there is an comparable number of general ed. students, (the same as or more general ed than special ed students) then the bus route is classified as a general ed route and the school district is not able to pursue reimbursement of transportation costs through the state form T2. <p>100% of the bus camera purchase, voucher #59855, was</p>	<p><u>Individual Correction</u></p> <p>The district will correct all special education expenditures that are currently coded to incorrect function codes, such as 1110 and 1130 in school year 2011-12. The district will provide evidence of correction.</p> <p>If possible the incorrectly applied function codes for school year 2010-2011 will be corrected to ensure the district accurately reports their expenditures for Students With Disabilities from ALL FUND sources correctly in EMIS. If this is not possible the district will communicate the reasons in writing.</p> <p>The district will reimburse the Department of Education for the percent of the bus, bus camera and shredder purchase that are not appropriately applied to special education funding.</p> <p>The district will reimburse the Department of Education up to \$60,791 in local expenditures paid from ARRA because the district believed it was eligible to replace local funds in FY11. If any of the items paid were new special education expenditures, not previously funded by local funds, then they are eligible as regular ARRA expenditures and will reduce the total due the department. The district will provide a justification for any items they believe qualify as new and appropriate uses of ARRA.</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>paid from ARRA and it is used for the bus that transports general and special education students.</p> <p>100% of the cost of a shredder voucher 61758, used by the High School Guidance Counselor and the Special Education director was charged to ARRA. 50% of the cost of the shredder should have been paid from the same funding sources used to pay the High School Counselor's salary.</p> <p>The district replaced \$60, 791.00 in local expenditures in FY11 with ARRA via journal transaction 957299 and 957302. The specific expenditures were:</p> <ol style="list-style-type: none"> 1) \$35K in Mental Health Excess cost expenses, 2) \$14,000 to cover the special education director's work that was coded to the general fund as the transportation director. 3) \$4,400 to cover general education supplies. 4) \$1,800 to cover general education coded Brunner SAT team expenses 5) \$1,800 to cover general education coded Allen SAT team 6) \$6,551 to cover 3% of the treasurer's office cost. <p>The district was not eligible to replace local funds in FY11 because it did not receive a new allocation greater than the FY10 allocation. Carryover cannot be used to calculate the change from one year's allocation to the next. The amount available for local replacement must be utilized in the year the increase occurred, it cannot be carried over into a new fiscal year. CCIP note #216 addresses local replacement.</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 and a FINDET for fund 516 for FY12 as evidence of correction.</p>		

Findings Citation	Evidence	Evidence of Correction		Must be addressed in CAP
		Required Actions	Date Due	
	<p>The district did not complete the local replacement section of the CCIP redirection page in FY10 or FY11. Had the district tried to enter the amount intended to be replaced in FY11 the system would have produced an error, not allowing the district to replace, since it was not eligible. ODE issued a CCIP note directing districts to enter information on the redirection page.</p> <p>There were no non-payroll transactions to review for FY12 fund 516 as of the date of the onsite. All the FY12 fund 516 expenditures were payroll related.</p> <p>North Point ESC provided findets for fund 587 ARRA and regular. All of the transactions were coded to the appropriate fund, function and object. The expenditures were appropriate for the source of funds. No issues were found.</p>			

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

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 62215, for the purchase of 8 scanners and 3 color printers was reviewed. The district followed their purchasing procedures. The function codes were incorrectly applied to general education.	<u>Individual Correction</u> The district will correct the function codes to reflect the special education grade level the purchases are intended to support. <u>Systemic Correction</u> None	Individual Correction for Fiscal Requires the following due date: *30 days from receipt of this report.	<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 a 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		
300.202	6 inventory eligible items were located for testing, Smart boards. At the time of the review the items had just been received and were in the process of being placed in the classroom. They weren't out of the boxes so they were not tagged per the district policy. This was simply a timing issue, not a systemic issue. Prior to ARRA the district did not use fund 516 to purchase equipment.	<u>Individual Correction</u> None <u>Systemic Correction</u> None		<input checked="" type="checkbox"/> No

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	
300.130 through 300.144	<p>There are 11 non-publics in the district; none are participating.</p> <p>The district does maintain the records for the number of children evaluated and subsequently identified as SWD.</p>	<p><u>Individual Correction</u> None</p> <p><u>Systemic Correction</u> None</p>	<input checked="" type="checkbox"/> No

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	
300.165 and Part 300.201	The district was unaware of this requirement and OEC provided a copy of the law to the treasurer.	<p><u>Individual Correction</u> None</p> <p><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.</p>	<input checked="" type="checkbox"/> Yes

Component 8: Redirection of funds

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

The district/school reduced its local expenditures by no more than ½ of its additional allocation amount and 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	
300.205	The district maintains the number of children served and ultimately identified as a student with a disability. The district did not redirect funding for this purpose; instead the district utilizes local funds for CEIS type services.	<u>Individual Correction</u> None <u>Systemic Correction</u> None	<input checked="" type="checkbox"/> NA

Gifted Education Review

A gifted education review to ensure compliance with state law and state *Operating Standards for Identifying and Serving Gifted Students* was conducted on November 7, 2011 by Rosemary Pearson.

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

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

Component 1: Gifted Budget

Based on Am. Sub. HB 1, is the district spending 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?

Findings Citation	Evidence	Evidence of Correction	Must be addressed in CAP
		Required Actions	
ORC 3306.09(G)	OEC reviewed district spending related to gifted education. Evidence was provided to demonstrate that gifted spending for fiscal year 2011 was not equal to or more than fiscal year 2009 unit funding.	<u>Individual Correction</u> None <u>Systemic Correction</u> The district will describe in its Corrective Action Plan the method it will use to assure that it will meet its minimum spending requirements for the 2012-2013 school year.	<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?

Findings Citation	Evidence	Evidence of Correction	Must be addressed in CAP
		Required Actions	
OAC 3301-51-15(D)(4)	The district reports no students served, so there are no WEPs to review.	<u>Individual Correction</u> None <u>Systemic Correction</u> None	<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.

Findings Citation	Evidence	Evidence of Correction	Must be addressed in CAP
		Required Actions	
ORC 3324.06(D)	No students are served.	<u>Individual Correction</u> None <u>Systemic Correction</u> None	<input checked="" type="checkbox"/> NA

Component 4: Acceleration and Attestation

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

Findings Citation	Evidence	Evidence of Correction		Must be addressed in CAP
		Required Actions		
ORC 3324.10	The district provided evidence to show that they have implemented their acceleration policy.	<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?

Findings Citation	Evidence	Evidence of Correction		Must be addressed in CAP
		Required Actions		
OAC 3301-51-15(E)(2)	The district has no gifted intervention specialists.	<u>Individual Correction</u> None	<u>Systemic Correction</u> None	<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?

Findings Citation	Evidence	Evidence of Correction		Must be addressed in CAP
		Required Actions		
OAC 3301-51-15(E)(3), OAC 3301-51-15(E)(6)	The coordinator presented appropriate licensure.	<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?

Findings Citation	Evidence	Evidence of Correction		Must be addressed in CAP
		Required Actions		
OAC 3301-51-15(E)	No service is provided.	<u>Individual Correction</u> None	<u>Systemic Correction</u> None	<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 is differentiated?

Findings Citation	Evidence	Evidence of Correction	Must be addressed in CAP
		Required Actions	
OAC 3301-51-15(D)(3)(b)(i)	No service is provided.	<u>Individual Correction</u> None <u>Systemic Correction</u> None	<input checked="" type="checkbox"/> NA