

<b>Life Skills Center of Akron IRN 133868</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 April 2-4, 2012 by the Ohio Department of Education's Office for Exceptional Children (OEC) 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 and Fiscal)

**IDEA Review**

**Overview**

Educational consultants from the Office for Exceptional Children (OEC) conducted IDEA review activities on April 2-3, 2012. During the IDEA Review, OEC consultants monitor the LEA's implementation of the IDEA to ensure compliance. The primary focus of the IDEA Review is to:

- Improve educational results and functional outcomes for all children with disabilities; and
- Ensure that LEAs meet program requirements under Part B of IDEA, particularly those requirements that are most closely related to improving educational results for children with disabilities.

OEC focused the review on the following areas:

- Child Find;
- Delivery of Services;
- Least Restrictive Environment;
- Data Verification.

**Data Sources**

During the review, OEC considered information from the following sources:

1. Public Parent Meeting, Individual Parent Meetings and Written Comments

On March 16, 2012, Life Skills Center of Akron School mailed 48 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.

On April 2, 2012, OEC consultants held a public meeting for parents and other interested parties. Public parent meeting dates for all districts selected for IDEA Reviews are posted on the ODE website. Zero parents and one State Support Team (SST) Region 8 representative attended the public meeting. Attendees could speak to OEC representatives publicly in the meeting or individually, provide written comments, or both. No parents made comments during the public meeting. Written comment forms were available before, during and after the meeting. OEC received no written comments. On the same day, the consultants were available to hold individual parent/guardian meetings.

During the public meeting, parents were advised by OEC consultants of the formal complaint process under IDEA and that their public comments did not constitute a formal complaint. The participants were

also informed that while the information they provided may be helpful to the review, it may not necessarily be acted upon as part of the review process. "Whose IDEA Is This?" Ohio's procedural safeguards notice was available for participants who wanted a copy.

## 2. Pre-Onsite Data Analysis

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

## 3. Record Review

On April 2-3, 2012, OEC consultants reviewed 31 records of school age students with disabilities. OEC selected records of a variety of children with disabilities from The Life Skills Center of Akron.

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

## 4. Staff/Administrative Interviews

On April 4, 2012, OEC consultants held two sessions of interviews with two administrators and five teachers, school counselors, one related services personnel and one school psychologist. 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 Life Skills Center of Akron School. 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 Robyn Floyd, OEC Lead Consultant at [robyn.floyd@education.ohio.gov](mailto:robyn.floyd@education.ohio.gov) within 30 school days from the date of this report. OEC will review the action plan submitted by the district for approval. If OEC deems that a revision(s) is necessary, the district will be required to revise and resubmit. The district will be contacted by the OEC Lead Consultant and notified when the action plan has been approved.

**CAP Due Date: 07-02-2012**

#### **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: 08-14-2012**

#### **Systemic Correction**

The district must correct any noncompliant policies, procedures and/or practices identified through the onsite review. OEC will verify through follow-up review of new data that the noncompliant policies, procedures and/or practices have been revised and the district is correctly implementing the regulatory requirements of IDEA. The follow-up review of new data will include review of individual student records and may include parent/staff/administrative interviews, as needed.

**Systemic Correction Due Date: 05-20-2013**

For questions about specific components of this report please contact:

- **Special Education School Age:** Robyn Floyd, OEC Lead Consultant, at (614) 387-2204, toll-free at (877) 644-6338, or by e-mail at [robyn.floyd@education.ohio.gov](mailto:robyn.floyd@education.ohio.gov).
- **Fiscal:** Tom Main, Educational Consultant, at (614) 387-0156, toll-free at (877) 644-6338, or by e-mail at [tom.main@education.ohio.gov](mailto:tom.main@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>Nine applicable reevaluation records indicated that the child's reevaluation was not completed within the three year timeline.</p> <p><u>Interviews</u></p> <p>Interviews revealed that the school tries to get as much information as possible from previous records and conversations with the parent(s) and the student(s). School staff meets to review transfer IEPs and ETRs to determine if the content holds true to that student. If these documents appear to be outdated, they conduct a new ETR/IEP.</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 child find evaluation process. 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>
CF-2	300.305(a)	<p><u>Record Review</u></p> <p>Preschool evaluation transitions are not applicable.</p>	<p><u>Individual Correction</u></p> <p>N/A</p> <p><u>Systemic Correction</u></p> <p>N/A</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>One applicable school age initial evaluation did not appropriately document interventions provided to resolve concerns for the child performing below grade-level standards.</p> <p><u>Interviews</u></p> <p>Interviews revealed that interventions were provided to the children, but were not always documented in the ETR.</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>Ten applicable school age records did not show evidence that the evaluation planning team included the parent.</p> <p><u>Interviews</u></p> <p>Interviews revealed that the school makes multiple attempts to get ahold of a parent(s); they also make home visits to the home of each special education student if necessary.</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"/> Yes A Corrective Action Plan is required due to meeting the 30% threshold of non-compliance.

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>Four school age evaluations did not provide 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>Nine school age evaluations did not provide 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"/> 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-7	300.304(c)(4); OAC 3301-51-01; and OAC 3301-51-06	<u>Record Review</u> Five school age evaluations did not provide evidence that the evaluation addresses all areas related to the suspected disability.	<u>Individual Correction</u> 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.  <u>Systemic Correction</u> The district must submit evidence to OEC of written procedures and practices in place to provide evidence that the evaluation addresses all areas related to the suspected disability.  OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.	<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)	<u>Record Review</u> Two 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.	<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.  <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.	<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)	<u>Record Review</u> All applicable school age 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.	<u>Individual Correction</u> None <u>Systemic Correction</u> None	<input checked="" type="checkbox"/> NA
CF-10	300.306(a)(1); 300.305(a); and 3301-51-01 (B)(21)	<u>Record Review</u> One school age reevaluation 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.	<u>Individual Correction</u> The district must provide evidence that the IEP team and other qualified professionals participated in the eligibility determination. If not, the IEP team must reconvene the ETR meeting and provide OEC evidence of group participation.  IEP Team Members include, but are not limited to: <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> <u>Systemic Correction</u> The district must submit evidence to OEC of written procedures and practices in place regarding the eligibility determination process.  OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.	<input checked="" type="checkbox"/> No The district does <u>not</u> need to address this finding in a Corrective Action Plan.

**Component 2: Delivery of Services**

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

Record 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>Six school age student IEPs did not address how the child's disability affects his/her involvement and 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 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>Ten applicable school age 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>Interviews revealed that district staff requires comprehensive technical assistance (TA) and professional development (PD), regarding section 6 of the IEP.</p> <p>The TA and PD shall cover the following Record Review Item: DS-5.</p>	<p><u>Individual Correction</u></p> <p>The district must reconvene the IEP teams of the ten 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>	<input checked="" type="checkbox"/> Yes A Corrective Action Plan is required due to meeting the 30% threshold of non-compliance.
DS-3	300.320 (a)(2)(i)(A)	<p><u>Record Review</u></p> <p>All school age IEPs contained annual goals that address the child's academic area(s) of need.</p>	<p><u>Individual Correction</u></p> <p>None</p> <p><u>Systemic Correction</u></p> <p>None</p>	<input checked="" type="checkbox"/> NA
DS-4	300.320(a)(2)(i)(A)	<p><u>Record Review</u></p> <p>All school age IEPs contained annual goals that address the child's functional area(s) of need.</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	
DS-5	300.320(a)(2)(i)	<p><u>Record Review</u> Ten applicable school age IEPs did not contain measurable annual goals.</p> <p><u>Interviews</u> Reference DS-2</p>	<p><u>Individual Correction</u> The district must reconvene the IEP teams of the ten 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> 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>	<input checked="" type="checkbox"/> Yes A Corrective Action Plan is required due to meeting the 30% threshold of non-compliance.
DS-6	300.320(a)(4)	<p><u>Record Review</u> All school age IEPs contained a statement of specially designed instruction that addresses the needs of the child and supports annual goals.</p>	<p><u>Individual Correction</u> None</p> <p><u>Systemic Correction</u> 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	
DS-7	300.320(a)(7)	<p><u>Record Review</u> Ten applicable school age IEP(s) did not indicate the location where the specially designed instruction will be provided.</p> <p><u>Interviews</u> Interviews revealed that district staff requires comprehensive technical assistance (TA) and professional development (PD), regarding section 7 of the IEP.</p>	<p><u>Individual Correction</u> The district must reconvene the IEP teams of the ten IEPs identified as noncompliant to review and amend the location where the specially designed instruction will be provided.</p> <p><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 location where specially designed instruction will occur.  OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.</p>	<input checked="" type="checkbox"/> Yes A Corrective Action Plan is required due to meeting the 30% threshold of non-compliance.
DS-8	300.320(a)(7)	<p><u>Record Review</u> All school age IEPs indicated the amount of time and frequency of the specially designed instruction.</p>	<p><u>Individual Correction</u> None</p> <p><u>Systemic Correction</u> None</p>	<input checked="" type="checkbox"/> NA
DS-9	300.320(a)(4)	<p><u>Record Review</u> Identification of the related services that address the needs of the child and support the annual goals were not applicable on student IEPs reviewed.</p>	<p><u>Individual Correction</u> None</p> <p><u>Systemic Correction</u> None</p>	<input checked="" type="checkbox"/> NA
DS-10	300.320(a)(7)	<p><u>Record Review</u> Indication of the location where the related services will be provided were not applicable on student IEPs reviewed.</p>	<p><u>Individual Correction</u> None</p> <p><u>Systemic Correction</u> None</p>	<input checked="" type="checkbox"/> NA
DS-11	300.320(a)(7)	<p><u>Record Review</u> Indication of the amount of time and frequency of the related services to be provided were not applicable on student IEPs reviewed.</p>	<p><u>Individual Correction</u> None</p> <p><u>Systemic Correction</u> None</p>	<input checked="" type="checkbox"/> NA

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

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

Record 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>Identification of assistive technology to enable the child to be involved in and make progress in the general education curriculum was not applicable on student IEPs reviewed.</p>	<p><u>Individual Correction</u></p> <p>None</p> <p><u>Systemic Correction</u></p> <p>None</p>	<input checked="" type="checkbox"/> NA
LRE-2	300.320(a)(6)(i)	<p><u>Record Review</u></p> <p>Three school age 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 three 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)	<p><u>Record Review</u></p> <p>Six applicable school age IEPs did not identify modifications to enable the child to be involved in and make progress in the general education curriculum.</p> <p><u>Interviews</u></p> <p>Interviews revealed that the team looks at the data and the test/assessment results to determine what the student is struggling with. Baseline data is taken, interventions are implemented and the team meets to discuss the student's needs. After a student is enrolled, a standard six week meeting is held to discuss the placement option that best suits the student's needs, and the parent is invited to the meeting to give input.</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 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>	<input checked="" type="checkbox"/> Yes A Corrective Action Plan is required due to meeting the 30% threshold of non-compliance.
LRE-4	300.320(a)(4)	<p><u>Record Review</u></p> <p>Identification of supports for school personnel to enable the child to be involved in and make progress in the general education curriculum was not applicable on student IEPs reviewed.</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-5	300.320(a)(5)	<p><u>Record Review</u></p> <p>Ten applicable 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><u>Interviews</u></p> <p>Interviews revealed that district staff requires comprehensive technical assistance (TA) and professional development (PD), regarding LRE.</p>	<p><u>Individual Correction</u></p> <p>The district must reconvene the IEP teams of the ten 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>	<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)	<u>Record Review</u> Four school age IEPs did not indicate that the IEP Team included a parent.	<u>Individual Correction</u> For the four IEPs identified as noncompliant, the district must: <ul style="list-style-type: none"> <li>• Provide evidence of parent participation at the IEP meeting, <b>or</b></li> <li>• Provide documentation of at least three attempts made by the district to ensure parent participation, <b>or</b></li> <li>• Reconvene the IEP team to review the IEP with the parent.</li> </ul> <u>Systemic Correction</u> The district must submit evidence to OEC of written procedures and practices in place regarding parent involvement in the IEP process.  OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.	<input checked="" type="checkbox"/> No The district does <u>not</u> need to address this finding in a Corrective Action Plan.
LRE-7	300.321(2)	<u>Record Review</u> All school age IEPs indicated that the IEP Team included a regular education teacher.	<u>Individual Correction</u> None  <u>Systemic Correction</u> None	<input checked="" type="checkbox"/> NA
LRE-8	300.321(3)	<u>Record Review</u> All school age IEPs indicated that the IEP Team included a special education teacher.	<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-9	300.321(4)	<u>Record Review</u> All school age IEPs indicated that the IEP Team included an LEA representative.	<u>Individual Correction</u> None <u>Systemic Correction</u> None	<input checked="" type="checkbox"/> NA
LRE-10	300.321(5)	<u>Record Review</u> All school age IEPs indicated that the IEP Team included of a person qualified to interpret the instructional implications of evaluation results.	<u>Individual Correction</u> None <u>Systemic Correction</u> None	<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> Nine applicable school age IEPs indicated that the child did not have an IEP in effect as reported on the LEA's December 1, 2010 Child Count Report.  <u>Other Considerations</u> Due to the nature of the configuration of the program to address the needs of at-risk students by giving them a second chance at obtaining a quality education, vocational training and placement, the transient rate between enrollments/withdrawals from the home school to a non-graded, non-traditional high school poses challenges for accurate data input.	<u>Individual Correction</u> None <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.

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
DV-2	300.645 R.C. 3301.07.14	<u>Record Review</u> Seven school age ETRs indicated that the child did not 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> 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.
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.
DV-4	SPP Indicator 11 300.301(c)(1)(i)	<u>Record Review</u> All applicable school age 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

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
DV-5	SPP Indicator 12 300.124	<u>Record Review</u> The school does not serve preschool.	<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> Indicator 20 for Secondary Transition Plans was not reviewed because the district did not report 100% compliance for Indicator 13.	<u>Individual Correction</u> None  <u>Systemic Correction</u> None	<input checked="" type="checkbox"/> NA

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

**Component 1: Statement of Accounts**

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

Findings Citation	Evidence	Evidence of Correction		Must be addressed in CAP
		Required Actions	Date Due	
300.202	The 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.	<u>Individual Correction</u> None  <u>Systemic Correction</u> None		<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	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.	<u>Individual Correction</u> None  <u>Systemic Correction</u> None		<input checked="" type="checkbox"/> NA

### Component 3: Non-Payroll Expenditures

*The district/school is able to document that the federal funds were expended for an appropriate purpose and reasonable for the program; that fiscal coding is appropriate and the funds were charged to the proper fund, function and object; that the district is able to document the expenditure with a purchase order, receipt statement or invoice.*

Findings Citation	Evidence	Evidence of Correction		Must be addressed in CAP
		Required Actions	Date Due	
300.202	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.	<u>Individual Correction</u> None  <u>Systemic Correction</u> None		<input checked="" type="checkbox"/> NA

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

*If the district/school expended funds for Capital Outlay and/or equipment, the district/school evidences that it has followed the board adopted procurement policy. The district must ensure that equipment and supplies placed in the non-public school are used for Part B purposes only and can be removed from the non-public school without remodeling the school facility.*

Findings Citation	Evidence	Evidence of Correction		Must be addressed in CAP
		Required Actions	Date Due	
300.202	The district/school expended funds for Capital Outlay and/or equipment, the district/school evidences that it has followed the board adopted procurement policy.	<u>Individual Correction</u> None  <u>Systemic Correction</u> None		<input checked="" type="checkbox"/> NA

**Component 5: Equipment inventory policy and procedures**

*The district/school retains control and administration of funds used to purchase materials, equipment and property purchased with those funds for the uses and purpose provided in the IDEA. The district is properly identifying equipment purchased with IDEA funds and is complying with Board Policy in cataloguing and inventorying the equipment. The district master list of equipment purchased with IDEA funds was updated within the last two years; the district has an equipment disposal policy; The district requested disposition instructions from ODE prior to disposing of assets with at fair market value of more than \$5,000.00, and sale proceeds were deposited back into the original grant.*

Findings Citation	Evidence	Evidence of Correction		Must be addressed in CAP
		Required Actions	Date Due	
300.202	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.	<u>Individual Correction</u> None  <u>Systemic Correction</u> None		<input checked="" type="checkbox"/> NA

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

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

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

Findings Citation	Evidence	Evidence of Correction		Must be addressed in CAP
		Required Actions	Date Due	
300.130 through 300.144	<p>The district provides <b>child find</b> 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.</p> <p>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.</p>	<p><u>Individual Correction</u> None</p> <p><u>Systemic Correction</u> None</p>		<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	In accordance with 34 CFR 300.165, the district/school was unable to provide 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.	<u>Individual Correction</u> None  <u>Systemic Correction</u>  Life Skills Center of Akron must provide evidence of the intent to schedule and announce an opportunity for public participation in the planning for use of IDEA funds. The district must also submit a Corrective Action Plan to include a policy and the implementation steps on how it will provide an opportunity for public participation in the planning for the use of IDEA Part B funds.		<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	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 CEIS 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.	<u>Individual Correction</u> None  <u>Systemic Correction</u> None		<input checked="" type="checkbox"/> NA