

<b>Lima City School District IRN 044222</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 October 17-20, 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 October 17-20, 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 7, 2011, Lima City Schools mailed 803 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 7, 2011 on the Lima City Schools website.

On October 17, 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. Two parents, and One State Support Team (SST) Region 6 representative attended the public meeting. Attendees could speak to OEC representatives publicly in the meeting or individually, provide written comments, or both. Two parents 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 October 17-18, 2011, OEC consultants reviewed 41 records of school age students with disabilities. An OELS&R consultant, on October 17, 2011, reviewed 6 records as part of the Early Childhood Special Education Review. OEC selected records of a variety of children with disabilities from 10 buildings.

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

## 4. Staff/Administrative Interviews

On October 19-20, 2011, OEC consultants held four sessions of interviews with 10 administrators and 22 teachers, school counselors, related services personnel and school psychologists. OEC interviews focused on the following review areas: Child Find; Delivery of Services; Least Restrictive Environment (LRE) and IEP alignment.

## **Findings**

A finding is made when noncompliance with a specific IDEA requirement is identified through the processes outlined above. All findings of noncompliance must be corrected as soon as possible, but no later than one year of the date of this report.

OEC provides separate written correspondence to the school district and the parent/guardian when action is required to correct findings of non-compliance for individual students.

Noncompliance that is identified in **30% or more** of the records reviewed by OEC and substantiated through other data sources must be included in a comprehensive corrective action plan (CAP) with action steps to address each of the noncompliance findings.

All noncompliance identified by OEC as part of the IDEA review, listed by subject area within this report in the *Review of Findings and District Required Actions* table, must be corrected as set forth below.

### **Corrective Action Plan (CAP)**

The *Review of Findings and District Required Actions* identifies the noncompliance which must be addressed in the corrective action plan developed by the Lima City School District. An approved form for the corrective action plan will be provided by OEC or can be accessed on ODE's web site by using the keyword search "OEC Corrective Action Plan". The corrective action plan developed by the district must include the following:

- Improvement strategies to address all areas of identified non-compliance,
- Documentation/evidence of implementation of the strategies,
- Individuals responsible for implementing the strategies,

- Resources needed, and
- Completion dates.

State Performance Plan (SPP) results indicators may also be included in the corrective action plan to address improved performance for students with disabilities.

The district must submit the corrective action plan to Stephanie Falor, OEC Lead Consultant at [stephanie.falor@ode.state.oh.us](mailto:stephanie.falor@ode.state.oh.us) 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: 03/20/2012**

### **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 and all other findings, unless noted otherwise in the report.

**Individual Correction Due Date: 05/04/2012**

### **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: 02/01/2013**

For questions about specific components of this report please contact:

- **Special Education School Age:** Stephanie Falor, OEC Lead Consultant, at 614-387-2236, toll-free at (877) 644-6338, or by e-mail at [stephanie.falor@ode.state.oh.us](mailto:stephanie.falor@ode.state.oh.us).
- **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](mailto:Barbara.Weinberg@ode.state.oh.us).
- **Fiscal:** Earl Focht, Educational Consultant, at 614-387-0940, toll-free at (877) 644-6338, or by e-mail at [earl.focht@ode.state.oh.us](mailto:earl.focht@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](mailto: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 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"/> 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, 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> All school age initial evaluation(s) appropriately document interventions provided to resolve concerns for the child performing below grade-level standards.</p> <p><u>Interviews</u> District personnel were able to explain and show evidence of the process for providing and documenting interventions for children before moving to a full eligibility evaluation.</p>	<p><u>Individual Correction</u> None</p> <p><u>Systemic Correction</u> None</p>	<input checked="" type="checkbox"/> NA
CF-4	300.501(b)(1)	<p><u>Record Review</u> Three school age record(s) did not show evidence that the evaluation planning team included the parent.</p> <p>All preschool records showed evidence that the parent were included.</p> <p><u>Interviews</u> District staff did explain and provide evidence of the process for including the parent in the ETR planning process.</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>	<input checked="" type="checkbox"/> No The district does <u>not</u> need to address this finding in a Corrective Action Plan.

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction		Must be addressed in CAP
			Required Actions		
CF-5	300.305(a)(1)	<u>Record Review</u> All school age and preschool evaluation(s) provided evidence that the evaluation planning team reviewed existing data on the child.	<u>Individual Correction</u> None	<u>Systemic Correction</u> None	<input checked="" type="checkbox"/> NA
CF-6	300.305(a)(2)	<u>Record Review</u> All school age and preschool evaluation(s) provided evidence that the evaluation planning team identified what additional data, if any, were needed.	<u>Individual Correction</u> None	<u>Systemic Correction</u> None	<input checked="" type="checkbox"/> NA
CF-7	300.304(c)(4); OAC 3301-51-01; and OAC 3301-51-06	<u>Record Review</u> All school age and preschool evaluation(s) provided evidence that the evaluation addresses all areas related to the suspected disability.	<u>Individual Correction</u> None	<u>Systemic Correction</u> None	<input checked="" type="checkbox"/> NA
CF-8	300.306(a)(1)	<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.  All preschool records showed evidence that the parents of the child were involved in determining whether the child is a child with a disability.  <u>Interviews</u> District staff did explain how efforts are made to involve parents in the ETR determination process, and the procedures for documenting attempts to contact and involve parents.	<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 school age and preschool initial evaluation(s) 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> Two school age reevaluation(s) 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>Two school age IEPs did not address how the child's disability affects his/her involvement and progress in the general education curriculum.</p> <p>All preschool IEPs addressed how the child's disability affects his/her involvement and progress in the general education curriculum.</p> <p><u>Interviews</u></p> <p>District administrators and staff members referred to efforts that are being made to improve this process.</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 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>Nine 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><u>Interviews</u></p> <p>Staff members indicated during interviews that this information may not be on the IEP but is communicated and documented in student folders. The district uses a variety of progress monitoring, district wide assessments, planned meetings and data teams to address student's present levels of performance.</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 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"/> No The district does <u>not</u> need to address this finding in a Corrective Action Plan.
DS-3	300.320 (a)(2)(i)(A)	<p><u>Record Review</u></p> <p>All school age and preschool IEP(s) 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 and preschool IEP(s) 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> Fourteen school age and one preschool IEP(s) did not contain measurable annual goals.</p> <p><u>Interviews</u> District administrators reported that there are many new teachers/staff within the district and that training has and will continue to be provided.</p>	<p><u>Individual Correction</u> The district must reconvene the IEP team(s) of the fifteen 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"> <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.

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>Fifteen school age and three preschool IEP(s) combined did not contain a statement of specially designed instruction that addresses the needs of the child and supports annual goals.</p> <p><u>Interviews</u></p> <p>Teachers and staff discussed that specially designed instruction is provided to the student regardless of whether he/she is identified as a student with a disability. Fluid and flexible services are available and may make it harder to describe what is "specialized".</p>	<p><u>Individual Correction</u></p> <p>The district must reconvene the IEP team(s) of the eighteen 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>Eleven school age IEP(s) combined did not indicate the location where the specially designed instruction will be provided.</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 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"/> 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-8	300.320(a)(7)	<p><u>Record Review</u> Four school age IEP(s) did not indicate the amount of time and frequency of the specially designed instruction.</p> <p>All preschool student IEPs indicated the amount of time and frequency of the specially designed instruction.</p> <p><u>Interviews</u> Methods to clarify amount and frequency were discussed with district administrators and staff.</p>	<p><u>Individual Correction</u> The district must reconvene the IEP team(s) of the four 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> The district must submit evidence to OEC of written procedures and practices in place regarding the IEP process of determining the amount and frequency of specially designed instruction to be provided. OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.</p>	<input checked="" type="checkbox"/> No The district does <u>not</u> need to address this finding in a Corrective Action Plan.
DS-9	300.320(a)(4)	<p><u>Record Review</u> All school age and preschool IEP(s) identified related services that address the needs of the child and support the annual goals.</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> Six 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> The district must reconvene the IEP team(s) of the six 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> 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	
DS-11	300.320(a)(7)	<u>Record Review</u> All school age and preschool IEP(s) indicated the amount of time and frequency of the related services to be provided.	<u>Individual Correction</u> None  <u>Systemic Correction</u> None	<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)	<u>Record Review</u> All school age and preschool IEP(s) identified assistive technology to enable the child to be involved in and make progress in the general education curriculum.	<u>Individual Correction</u> None  <u>Systemic Correction</u> None	<input checked="" type="checkbox"/> NA
LRE-2	300.320(a)(6)(i)	<u>Record Review</u> All school age and preschool IEP(s) identified accommodations provided to enable the child to be involved in and make progress in the general education curriculum	<u>Individual Correction</u> None <u>Systemic Correction</u> None	<input checked="" type="checkbox"/> NA

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
LRE-3	300.320(a)(4)	<p><u>Record Review</u></p> <p>Three 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 three 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. 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-4	300.320(a)(4)	<p><u>Record Review</u></p> <p>One school age IEP 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 one 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. 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-5	300.320(a)(5)	<p><u>Record Review</u></p> <p>One school age IEP 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>Individual Correction</u></p> <p>The district must reconvene the IEP team(s) of the one 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"> <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"/> 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-6	300.321(1)	<u>Record Review</u> One school age IEP did not indicate that the IEP Team included a parent.	<u>Individual Correction</u> For the one IEP(s) identified as noncompliant, the district must: <ul style="list-style-type: none"> <li>• Provide evidence of parent participation at the IEP meeting, or</li> <li>• Provide documentation of at least three attempts made by the district to ensure parent participation, or</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.

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
LRE-7	300.321(2)	<p><u>Record Review</u></p> <p>Six school age IEP(s) did not indicate that the IEP Team included a regular education teacher.</p> <p><u>Interviews</u></p> <p>Administrators and staff discussed the importance of having both special education and regular education staff as active members at IEP team meetings as demonstrated on the signature page of the IEP.</p>	<p><u>Individual Correction</u></p> <p>For the six IEP(s) identified as noncompliant, the district must:</p> <ul style="list-style-type: none"> <li>• Provide documentation that the parent was informed prior to the IEP meeting that the regular education teacher would not participate in the meeting, <b>and</b></li> <li>• Provide a written excuse signed by the parents and the district that allowed the regular education teacher not to be in attendance at the IEP meeting, <b>or</b></li> <li>• Reconvene the IEP team to review the IEP will all required members present.</li> </ul> <p><u>Systemic Correction</u></p> <p>The district must submit evidence to OEC of written procedures and practices in place regarding regular education teacher involvement in the IEP process.</p> <p>OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.</p>	<input checked="" type="checkbox"/> No The district does <u>not</u> need to address this finding in a Corrective Action Plan.
LRE-8	300.321(3)	<p><u>Record Review</u></p> <p>All school age and preschool IEP(s) indicated that the IEP Team included a special education teacher.</p>	<p><u>Individual Correction</u></p> <p>None</p> <p><u>Systemic Correction</u></p> <p>None</p>	<input checked="" type="checkbox"/> NA.
LRE-9	300.321(4)	<p><u>Record Review</u></p> <p>All school age and preschool IEP(s) indicated that the IEP Team included an LEA representative.</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-10	300.321(5)	<u>Record Review</u> All school age and preschool IEP(s) 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> All school age and preschool IEP(s) indicated that the child has an IEP in effect as reported on the LEA's December 1, 2010 Child Count Report.	<u>Individual Correction</u> None	<u>Systemic Correction</u> None	<input checked="" type="checkbox"/> NA
DV-2	300.645 R.C. 3301.07.14	<u>Record Review</u> All school age and preschool ETRs indicated that the child has 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

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
DV-3	SPP Indicator 20: Accurate and Timely Reporting of Special Education Event Record	<u>Record Review</u> All school age and preschool records had accurate 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> None <u>Systemic Correction</u> None	<input checked="" type="checkbox"/> NA
DV-4	SPP Indicator 11 300.301(c)(1)(i)	<u>Record Review</u> All school age student and preschool student initial evaluation(s) reported as being conducted within 60 days of the district receiving parental consent for the evaluation was conducted within the required timeline.	<u>Individual Correction</u> None <u>Systemic Correction</u> None	<input checked="" type="checkbox"/> NA
DV-5	SPP Indicator 12 300.124	<u>Record Review</u> All preschool IEP(s) did not show evidence that an IEP was in place for 3 year olds transitioning from Early Intervention Programs (0-3 years) on or before the child's third birthday.	<u>Individual Correction</u> None <u>Systemic Correction</u> None	<input checked="" type="checkbox"/> NA

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
DV-6 A/B	SPP Indicator 20 for Secondary Transition Plans	<p><u>Record Review</u></p> <p>All school age IEP(s) showed evidence that the secondary transition plan reported in EMIS during 2010-2011 was in place that meets all 8 required elements of IDEA for the student, specifically in the following area(s):</p> <ol style="list-style-type: none"> <li>1. There are appropriate measurable postsecondary goal(s).</li> <li>2. The postsecondary goals are updated annually.</li> <li>3. The postsecondary goals were based on age appropriate transition assessment.</li> <li>4. There are transition services that will reasonably enable the student to meet the postsecondary goal(s).</li> <li>5. The transition services include courses of study that will reasonably enable the student to meet the postsecondary goal(s).</li> <li>6. The annual goal(s) are related to the student's transition service needs.</li> <li>7. There is evidence the student was invited to the IEP Team Meeting where transition services were discussed.</li> <li>8. When appropriate, there is evidence that a representative of any participating agency was invited to the IEP Team Meeting.</li> </ol>	<p><u>Individual Correction</u></p> <p>None</p> <p><u>Systemic Correction</u></p> <p>None</p>	<input checked="" type="checkbox"/> NA

**Additional Finding:**

Interview Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
Describe the continuum of educational placements that are available in the district?	3301-51-09 (A) and (C)(1)	<p><u>Record /Interview:</u> 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.</p> <p>Each school district must ensure that a continuum of alternative placements is available to meet the needs of children with disabilities for special education and related services.</p> <p><u>Other considerations:</u> The review of student records, interviews with administrators, staff and parents reflect that the Lima City School District has limited continuum of placement services available to its students.</p>	<p><u>Individual Correction</u> None</p> <p><u>Systemic Correction</u> The district must submit evidence to OEC of written procedures and practices in place regarding a continuum of services for their students with disabilities.</p>	<input checked="" type="checkbox"/> Yes A Corrective Action Plan is required.

**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*

Regulation 34 CFR	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
		Required Actions	
300.202	<p>The FER for FY11 516 and 587 ARRA matched the BUDLED provided by the district. No issues were found.</p> <p>The FY12 fund 516 and 587 expenditures to date are in line with the budget for each fund in the CCIP. The expenditures were accounted for in the correct budget categories</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.*

Regulation 34 CFR	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
		Required Actions	
300.202	<p>Fifty-two staff members were reviewed for certification /licensure, job description as well as payroll expenditures properly coded</p> <p>The ACCRPTs for fund 516 and 587 ARRA were reviewed for the time period spanning July 1, 2010 to September 2011. No coding errors were noted. Semi-annual certifications were provided for all staff paid from these funds. .</p> <p>The ACCRPT for fund 516 for school year2011-12 was reviewed. To date there are no coding errors. Staff paid from this fund is properly certified for the positions they fill.</p>	<p><u>Individual Correction</u> None</p> <p><u>Systemic Correction</u> None</p>	<input checked="" type="checkbox"/> NA

### 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.*

Regulation 34 CFR	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
		Required Actions	
300.202	<p>18 voucher packets were reviewed for FY 11 Fund 516 special cost center 9320. There were no errors noted.</p> <p>2 voucher packets were reviewed for FY 11 Fund 587 special cost center 9320. There were no errors noted.</p> <p>17 voucher packets were reviewed for FY12 fund 516 Fund. No errors were found.</p> <p>9 voucher packets were reviewed for FY12 fund 587. No errors were found.</p>	<p><u>Individual Correction</u> None</p> <p><u>Systemic Correction</u> None</p>	<input checked="" type="checkbox"/> NA

### 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.*

Regulation 34 CFR	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
		Required Actions	
300.202	<p>7 voucher packets were reviewed from FY11 516 ARRA and FY12 516 and 587 funds .The district followed their purchasing and inventory procedures as it relates to these purchases.</p> <p>These inventoried items were located for testing. They were properly tagged and easily located per the district's inventory documentation</p>	<p><u>Individual Correction</u> None</p> <p><u>Systemic Correction</u> None</p>	<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 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.*

Regulation 34 CFR	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
		Required Actions	
300.202	<p>The district provided their procurement policy as it is located on their district's website.</p> <p>The district is properly identifying equipment and is complying with the board policy in cataloguing and inventorying equipment.</p>	<p><u>Individual Correction</u> None</p> <p><u>Systemic Correction</u> None</p>	<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.

Regulation 34 CFR	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
		Required Actions	
300.130 through 300.144	<p>The district maintains records of the number of non-public students tested and served as well as timely consultation with area non-public schools.</p> <p>Documentation of meetings with the non-public schools was provided.</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.

Regulation 34 CFR	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
		Required Actions	
300.165 and Part 300.201	<p>The district published notice of receipt of funding and directed feedback and comments to be sent to the Special Education Supervisor. The district did not hold a meeting to share the spending plan with the public. I provided a copy of the law to the special education director.</p>	<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.*

Regulation 34 CFR	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
		Required Actions	
300.205	The district did not participate in redirecting their funds for CEIS.	<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 October 20, 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)	Evidence was provided to demonstrate that fiscal year 2011 gifted spending was equal to or more than fiscal year 2009 unit funding.	<u>Individual Correction</u> None  <u>Systemic Correction</u> None	<input checked="" type="checkbox"/> NA

## 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)	WEPs for ten students were provided and reviewed. All attributes except the waiver of assignments were present on all WEPs. Parent signatures will be obtained at parent conferences. The language for waiver of assignments needs to be changed so that it reflects a true waiver of assignments.	<p><b>Individual Correction</b> WEPs need to be amended to include a waiver of assignments.</p> <p><b>Systemic Correction</b> OEC will contact the district for submission of new records and review these records for evidence that the district is in compliance.</p>	<input checked="" type="checkbox"/> Yes

## 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)	The district attests that each gifted service offered in the district is available to all eligible students in each building in the district at that grade level.	<p><b>Individual Correction</b> None</p> <p><b>Systemic Correction</b> None</p>	<input checked="" type="checkbox"/> NA

#### Component 4: Acceleration and Attestation

*Do all district students who are accelerated have a Written Acceleration Plan (WAP) in place?*

Findings Citation	Evidence	Evidence of Correction	Must be addressed in CAP
		Required Actions	
ORC 3324.10	<p>WAPs were provided for early entrance, subject acceleration and whole grade acceleration. The students who are planning to graduate early do not have written acceleration plans.</p> <p>Policies were presented that show that the district has an IQ cut score and other eligibility requirements for early entrance which are not consistent with the required Iowa Acceleration Scale.</p>	<p><u>Individual Correction</u> The district needs to write a written acceleration plan for each student who has been approved for early graduation.</p> <p>Policies for early entrance need to be changed to make them consistent with the Iowa Acceleration Scale.</p> <p><u>Systemic Correction</u> None</p>	<input checked="" type="checkbox"/> Yes

#### 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)	<p>As per the attestation, requirements regarding percentage of time providing direct instruction and having other duties related to gifted education were met. Schedules confirmed this.</p>	<p><u>Individual Correction</u> None</p> <p><u>Systemic Correction</u> None</p>	<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)	Copies of licenses were provided for review. Staff members hold the appropriate licensure or endorsement.	<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)	The district attested that this requirement has been met. The attestation was confirmed by schedules which were provided for each gifted intervention specialist.	<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?*

Findings Citation	Evidence	Evidence of Correction	Must be addressed in CAP
		Required Actions	
OAC 3301-51-15(D)(3)(b)(i)	NA	<u>Individual Correction</u> None  <u>Systemic Correction</u> None	<input checked="" type="checkbox"/> NA