

Marlington Local School District IRN 049882
--

**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 between November 8 - 11, 2011 by the Ohio Department of Education's Office for Exceptional Children (OEC) and Office of Early Learning and School Readiness as part of its general supervision requirements under the Individuals with Disabilities Education Act (IDEA) and Am. Sub. HB1. The onsite visit consisted of the following reviews:

- IDEA Review: (Special Education School Age, Special Education Early Childhood and Fiscal)
- Gifted Education Review

IDEA Review

Overview

Educational consultants from the Office for Exceptional Children (OEC) conducted IDEA review activities on November 8 - 10, 2011. During the IDEA Review OEC consultants monitor the LEA's implementation of the IDEA to ensure compliance. The primary focus of the IDEA Review is to:

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

OEC focused the review on the following areas:

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

Data Sources

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

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

On 10/25/11, Marlington Local Schools mailed 394 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 10/27/11 in the Alliance Review edition, Local section, page 1 and on the district's website 10/25/11.

On November 8, 2011, OEC consultants held a public meeting for parents and other interested parties. Public parent meeting dates for all districts selected for IDEA Reviews are posted on the ODE website. Seven parents and three State Support Team (SST) Region 9 representatives attended the public meeting. Attendees could speak to OEC representatives publicly during the meeting or individually, provide written comments, or both. Two parents made formal comments during the public meeting.

Written comment forms were available before, during and after the meeting. OEC did not receive any written comments. On the same day, the consultants held one individual parent/guardian meeting.

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

2. Pre-Onsite Data Analysis

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

3. Record Review

November 8 - 9, 2011, OEC consultants reviewed 41 records of school age students with disabilities. On November 10, 2011, an OELS&R consultant, reviewed six records as part of the Early Childhood Special Education Review. OEC selected records of a variety of children with disabilities from one facility.

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

4. Staff/Administrative Interviews

November 9 – 10, 2011, OEC consultants held four sessions of interviews with five administrators, 21 teachers, 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 from 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 Marlington Local 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 Robyn Floyd, OEC Lead Consultant at robyn.floyd@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: 04-04-2012

Individual Correction

The district has 60 school days of the issuance of the letter of findings to correct all identified findings of non-compliance for individual students, unless noted otherwise in the report.

Individual Correction Due Date: 05-21-2012

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: 02-20-2013

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@ode.state.oh.us.
- **Special Education Early Childhood:** Edith Greer, Educational Consultant, at (330) 308-9939, or by e-mail at edith.greer@ecoesc.org.
- **Fiscal:** Tom Main, Educational Consultant, at (614) 387-0156, toll-free at (877) 644-6338, or by e-mail at tom.main@ode.state.oh.us.
- **Gifted Education:** Michael Demczyk, Educational Consultant, at (614) 995-3354, toll-free at (877) 644-6338, or by e-mail at michael.demczyk@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)	<u>Record Review</u> All reevaluation record(s) indicated that the child's reevaluations were completed within the three year timeline.	<u>Individual Correction</u> None <u>Systemic Correction</u> None	<input checked="" type="checkbox"/> NA
CF-2	300.305(a)	<u>Record Review</u> All preschool evaluation record(s) of children transitioning from Part C, utilized child information from the Individual Family Service Plan (IFSP) and other documentation provided by Help Me Grow in suspecting or when determining eligibility for Part B supports and services.	<u>Individual Correction</u> None <u>Systemic Correction</u> None	<input checked="" type="checkbox"/> NA
CF-3	OAC 3301-51-06 (2) and OAC 3301-51-06(4)	<u>Record Review</u> Two school age initial evaluation(s) did not appropriately document interventions provided to resolve concerns for the child performing below grade-level standards.	<u>Individual Correction</u> OEC has verified that these students have a current IEP in place, so no additional individual correction is required. <u>Systemic Correction</u> The district must submit evidence to OEC of written procedures and practices in place regarding documentation of intervention and supports provided prior to completion of the initial evaluation team report. 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-4	300.501(b)(1)	<p><u>Record Review</u></p> <p>Thirteen 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 was included.</p> <p><u>Interviews</u></p> <p>Separate small groups of no more than 10 staff members from each grade level division (nine Elementary staff; eight Middle School staff ; and four High School staff), who were connected to the 41 student records reviewed were asked to be a part of an interview session. Additionally, one group of administrators from each division (e.g. central office and school psychologist) were asked the same questions as the building level staff.</p> <p>Staff members were asked specific questions directly related to Child Find extended through the ETR to glean greater understanding from the record review question, "Did the evaluation team include the parent?"</p> <p>When the staff was asked to "Describe how the district informs parents about the evaluation planning process and ensure parent participation in evaluation planning", a combination of responses including the following were made:</p> <p><u>Initially</u> - Overall lack of consistency, changes in special education directors, psychologists, have created lack of understanding."</p> <p><u>Now</u> - The RtI process is used first, and then the teachers look at the data to analyze the progress for four weeks. If interventions are not working, the school holds a meeting with the parents. Sometimes the school tries another intervention and analyses progress again. The District is trying to be consistent throughout the whole district with documentation. If needed, the district then meets with the parents."</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>	<p><input checked="" type="checkbox"/> Yes</p> <p>A Corrective Action Plan is required due to meeting the 30% threshold of non-compliance.</p>

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
CF-5	300.305(a)(1)	<p><u>Record Review</u></p> <p>Eleven school age and one preschool student evaluation(s) did not provide evidence that the evaluation planning team reviewed existing data on the child.</p> <p><u>Interviews</u></p> <p>When the staff was asked “Did the evaluation planning team review existing data on the child?” and to “Describe how evaluation teams collect and record information that is provided by the parents”, a combination of responses including the following were made:</p> <p>“There has been inconsistency over the years-trying to be more consistent this year with procedures, paperwork, team members who are included; We are actually documenting interventions now, were not documenting in the past; Parents are involved in the process from the first concern; The district finds that the reevaluation process is completed if there are major changes in performance. The staff continually questions if the assigned disability matches the child’s performance level. If a parent brings in an assessment, those results are considered in the team process.”</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"/> Yes</p> <p>A Corrective Action Plan is required due to meeting the 30% threshold of non-compliance.</p>

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction		Must be addressed in CAP
			Required Actions		
CF-6	300.305(a)(2)	<p><u>Record Review</u></p> <p>Thirteen school age and one preschool student evaluation(s) did not provide evidence that the evaluation planning team identified what additional data, if any, were needed.</p> <p><u>Interviews</u></p> <p>When the staff was asked to “Describe what process or guidelines the ETR planning team uses to determine if any additional data or assessments are needed to complete the evaluation”, the following minimal responses were provided:</p> <p>“Psychologist talks with teachers, students who come in [to the district] are sometimes misidentified, outside evaluations are always considered.”</p>	<p><u>Individual Correction</u></p> <p>The district must provide the evaluation planning form or evidence documenting additional data, if any was reviewed during the evaluation planning process. If not, the IEP team must reconvene the ETR planning and ETR meeting.</p> <p><u>Systemic Correction</u></p> <p>The district must submit evidence to OEC of written procedures and practices in place to review additional data, if any during evaluation planning.</p> <p>OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.</p>	<p><input checked="" type="checkbox"/> Yes</p> <p>A Corrective Action Plan is required due to meeting the 30% threshold of non-compliance.</p>	
CF-7	300.304(c)(4); OAC 3301-51-01; and OAC 3301-51-06	<p><u>Record Review</u></p> <p>Ten school age evaluation(s) did not provide evidence that the evaluation addresses all areas related to the suspected disability.</p> <p>All preschool records showed evidence that the evaluation addresses all areas related to the suspected disability.</p>	<p><u>Individual Correction</u></p> <p>The district will convene the ETR team to conduct a reevaluation and provide evidence that the evaluation addresses all areas related to the suspected disability.</p> <p><u>Systemic Correction</u></p> <p>The district must submit evidence to OEC of written procedures and practices in place to provide evidence that the evaluation addresses all areas related to the suspected disability.</p> <p>OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.</p>	<p><input checked="" type="checkbox"/> No</p> <p>The district does <u>not</u> need to address this finding in a Corrective Action Plan.</p>	

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

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
CF-9	300.306(a)(1)	<p><u>Record Review</u></p> <p>Three school age initial evaluation(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.</p> <p>All preschool records showed evidence that a group of qualified professionals as appropriate to the suspected disability were involved in determining whether the child is a child with a disability.</p>	<p><u>Individual Correction</u></p> <p>The district must provide evidence that a group of qualified professionals participated in the eligibility determination. If not, the IEP team must reconvene the ETR meeting and provide OEC evidence of group participation.</p> <p>A group of qualified professionals includes the following, but is not limited to:</p> <ul style="list-style-type: none"> • Parent • Additional group members: <ul style="list-style-type: none"> • The child’s regular education teacher; or a regular classroom teacher qualified to teach a child of his or her age; or • For a preschool child an individual qualified by the SEA to teach a child of his or her age; and • At least one person qualified to conduct individual diagnostic examinations of children. <p><u>Systemic Correction</u></p> <p>The district must submit evidence to OEC of written procedures and practices in place regarding the eligibility determination process.</p> <p>OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.</p>	<input checked="" type="checkbox"/> No The district does <u>not</u> need to address this finding in a Corrective Action Plan.
CF-10	300.306(a)(1); 300.305(a); and 3301-51-01 (B)(21)	<p><u>Record Review</u></p> <p>All reevaluation(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.</p>	<p><u>Individual Correction</u></p> <p>None</p> <p><u>Systemic Correction</u></p> <p>None</p>	<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>Seven 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>All preschool records did 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 team(s) of the seven 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>
DS-2	300.320(a)(1)	<p><u>Record Review</u></p> <p>Thirteen school age student IEP(s) did not contain Present Levels of Academic Achievement and Functional Performance (PLOP) that addressed the needs of the student.</p> <p>All preschool student IEP(s) did contain Present Levels of Academic Achievement and Functional Performance (PLOP) that addressed the needs of the student.</p>	<p><u>Individual Correction</u></p> <p>The district must reconvene the IEP team(s) of the thirteen IEP(s) identified as noncompliant to review and amend the PLOP related to each goal to include:</p> <ul style="list-style-type: none"> • A summary of current daily academic/behavior and/or functional performance (strengths and needs); • Baseline data provided for developing a measurable goal. • For preschool, the PLOP should relate to the child's developmental domains, functional performance and pre-academic skills. 	<p><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	
		<p><u>Interviews</u></p> <p>When staff was asked to “Describe how the IEP team develops the PLOP for a student and documents student needs, baseline data and gaps in expected performance, as compared to age appropriate peers”, a combination of responses included the following:</p> <p>“...this is a work in progress, encouraging teachers to define reading levels and explain terms used in present levels. Looking into using DIBELS; some are using Study Island for progress monitoring. Testing Works should include components for progress monitoring.”</p> <p>“...the staff does not know enough about the details of writing the IEPs and what is needed to explain the student needs and services. There was expressed pride, however, in the fact that there are improvements in this area across the district. For progress monitoring, the screener Easy CBM or the Progress Monitoring System is used for assessments.”</p> <p>“Data, intervention provided (present reading levels every nine weeks with reading assessments), classroom performance , reading LEX, STAR - reading accelerated reading, CBM three times per year compared to classroom activities, common reading assessment, years ago used a pacing chart, writing common assessment for the 4th grade – journal entry with proper grade level.”</p> <p>“Regular education teachers receive an IEP at a Glance (“Testing Works” on the computer) – minimal awareness – just trained yesterday (data base of state wide testing Roy Gordon). Each Team has a binder and shares the information – needs to look up the information on their own; the</p>	<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>	

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
		<p>inclusion teacher shares information in some cases, but not in all cases.”</p> <p>“...they keep a copy of writing samples to bring to the annual meetings. The IEP Team looks at test score results and compare with typically developing peers. Each subject level gives nine month assessments. ETR results are also looked at to determine the PLOP. Teachers fill out checklists on other items such as social skills, learning habits, etc.”</p>		
DS-3	300.320 (a)(2)(i)(A)	<p><u>Record Review</u></p> <p>One school age IEP(s) did not contain annual goals that address the child’s academic area(s) of need.</p> <p>All preschool IEP(s) did contain annual goals that address the child’s academic area(s) of need.</p>	<p><u>Individual Correction</u></p> <p>The district must reconvene the IEP team(s) of the one IEP(s) identified as noncompliant to review and amend the IEP to include annual goals that address the academic needs that were identified in the IEP or provide evidence that the IEP team, based on the severity of the needs of the child, decided to prioritize addressing the needs.</p> <p><u>Systemic Correction</u></p> <p>The district must submit evidence to OEC of written procedures and practices in place regarding the IEP process of addressing identified academic needs.</p> <p>OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.</p>	<p><input checked="" type="checkbox"/> No</p> <p>The district does <u>not</u> need to address this finding in a Corrective Action Plan.</p>

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
DS-4	300.320(a)(2)(i)(A)	<p><u>Record Review</u></p> <p>One school age student IEP(s) did not contain annual goals that address the child’s functional area(s) of need.</p> <p>All preschool student IEP(s) did contain annual goals that address the child’s functional area(s) of need.</p>	<p><u>Individual Correction</u></p> <p>The district must reconvene the IEP team(s) of the one IEP(s) identified as noncompliant to review and amend the IEP to include annual goals that address the functional needs that were identified in the IEP or provide evidence that the IEP team, based on the severity of the needs of the child, decided to prioritize addressing the needs</p> <p><u>Systemic Correction</u></p> <p>The district must submit evidence to OEC of written procedures and practices in place regarding the IEP process of addressing identified functional needs.</p> <p>OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.</p>	<p><input checked="" type="checkbox"/> No</p> <p>The district does <u>not</u> need to address this finding in a Corrective Action Plan.</p>
DS-5	300.320(a)(2)(i)	<p><u>Record Review</u></p> <p>Thirteen school age and two preschool student IEP(s) did not contain measurable annual goals.</p> <p><u>Interviews</u></p> <p>When the staff was asked to “Describe how the IEP team develops measurable IEP goals which contain specific behavior to measure, specific conditions for measurement and specific performance criteria” a combination of responses included the following:</p> <p>“This is a work in progress. Staff did not have a good understanding of how to write measurable goals. Working on getting staff to use baseline data in present levels and stop using terms like “reading level J” without explaining what “reading level J” is...”</p>	<p><u>Individual Correction</u></p> <p>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"> 1. Who? 2. Will Do What? 3. To What Level of Degree? 4. Under What Conditions? 5. In What Length of Time? 6. How Will Progress Be Measured? 	<p><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	
		<p>Long pause of silence "...depends on where they are struggling...standards linked - shared in training most recently."</p> <p>With recent training, "we are doing better in writing IEP goals, developing a baseline that supports the goals. Goals need to be realistic, smart and obtainable. Goals are getting longer with more language in them to better describe the student needs...[by] getting away from the vague language in goal writing. There is much collaboration on writing goals. Goals tie into curriculum standards and help student on how to be more successful...work[ing] at meeting students "where they are", identifying what skills they need to access the general education curriculum."</p>	<p><u>Systemic Correction</u></p> <p>The district must implement new procedures to ensure that annual goals written subsequent to this report will include the following six critical elements to demonstrate correction:</p> <ol style="list-style-type: none"> 1. Who? 2. Will Do What? 3. To What Level of Degree? 4. Under What Conditions? 5. In What Length of Time? 6. How Will Progress Be Measured? <p>OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.</p>	
DS-6	300.320(a)(4)	<p><u>Record Review</u></p> <p>Nine school age and five preschool IEP(s) did not contain a statement of specially designed instruction that addresses the needs of the child and supports annual goals.</p> <p><u>Interviews</u></p> <p>When the staff was asked to "Describe how the IEP team determines the specially designed instruction to be provided (i.e. instruction that is different from what other students receive in the regular education setting?) and/or Describe what data or information is used to determine appropriate services (related services, accommodations, supports for school personnel etc.) for a child to be involved in and make progress in the general education curriculum" a combination of responses included the following:</p>	<p><u>Individual Correction</u></p> <p>The district must reconvene the IEP team(s) of the fourteen 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>

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
		<p>“There has been a reported change in the leadership with Special Education so specially designed instruction is also a “work in process.”</p> <p>“[Students are pulled] from the whole group and provide one-on-one reinforcement. Speech (social) social stories and role play - student interests are taken into consideration.”</p> <p>“Will have to meet to consider modifications (adjustments), Team approach during planning time, look ahead and assess what is being done now, re-teaching available, read the test, but extends this to other students in needs.”</p> <p>“...learning to be more specific about how to write specially designed instruction responses. There is a dialogue in the IEP meetings where staff asks the student about methods they think will help them.”</p> <p>“...would like to see more PD on differentiated instruction, including follow-up to ensure implementation. The Special Education Teacher connects with the regular education teach on what each student needs. There has been training in staff meeting on RtI, but no follow-up yet. Follow up to look at the tiers is weak. Staff has also received co-teaching training.”</p>		

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
DS-7	300.320(a)(7)	<p><u>Record Review</u></p> <p>Twelve school age IEP(s) did not indicate the location where the specially designed instruction will be provided.</p> <p>All preschool IEP(s) did indicate the location where the specially designed instruction will be provided.</p>	<p><u>Individual Correction</u></p> <p>The district must reconvene the IEP team(s) of the twelve 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>Professional development for Specially Designed Instruction should include clarification for this section as well.</p> <p>OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.</p>	<p><input checked="" type="checkbox"/> No</p> <p>The district does <u>not</u> need to address this finding in a Corrective Action Plan.</p>
DS-8	300.320(a)(7)	<p><u>Record Review</u></p> <p>Four school age IEP(s) did not indicate the amount of time and frequency of the specially designed instruction.</p> <p>All preschool IEP(s) did indicate the amount of time and frequency of the specially designed instruction.</p>	<p><u>Individual Correction</u></p> <p>The district must reconvene the IEP 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></p> <p>The district must submit evidence to OEC of written procedures and practices in place regarding the IEP process of determining the amount and frequency of specially designed instruction to be provided.</p> <p>OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.</p>	<p><input checked="" type="checkbox"/> No</p> <p>The district does <u>not</u> need to address this finding in a Corrective Action Plan.</p>

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

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
DS-11	300.320(a)(7)	<u>Record Review</u> All 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 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> One school age IEP(s) did not identify accommodations provided to enable the child to be involved in and make progress in the general education curriculum	<u>Individual Correction</u> The district must reconvene the IEP team(s) of the one IEP(s) identified as noncompliant to review the accommodations that would directly assist the child to access the course content without altering the amount or complexity of the information taught and include them on the IEP.	<input checked="" type="checkbox"/> No The district does not need to address this finding in a Corrective Action Plan.

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
			<u>Systemic Correction</u> The district must submit evidence to OEC of written procedures and practices in place regarding accommodations. OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.	
LRE-3	300.320(a)(4)	<u>Record Review</u> Two school age IEP(s) did not identify modifications to enable the child to be involved in and make progress in the general education curriculum?	<u>Individual Correction</u> The district must reconvene the IEP team(s) of the two 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. <u>Systemic Correction</u> The district must submit evidence to OEC of written procedures and practices in place regarding modifications. OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.	<input checked="" type="checkbox"/> No The district does <u>not</u> need to address this finding in a Corrective Action Plan.
LRE-4	300.320(a)(4)	<u>Record Review</u> One school age IEP(s) did not identify supports for school personnel to enable the child to be involved in and make progress in the general education curriculum. All preschool IEP(s) did identify supports for school personnel to enable the child to be involved in and make progress in the general education curriculum.	<u>Individual Correction</u> The district must reconvene the IEP 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.	<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	
			<u>Systemic Correction</u> 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.	
LRE-5	300.320(a)(5)	<u>Record Review</u> Three school age IEP(s) did not include an explanation of the extent to which the child will not participate with nondisabled children in the regular education classroom All preschool age IEP(s) did include an explanation of the extent to which the child will not participate with nondisabled children in the regular education classroom	<u>Individual Correction</u> The district must reconvene the IEP team(s) of the three IEP(s) identified as noncompliant to review and include a justification for why the child was removed from the regular education classroom. The justification should: <ul style="list-style-type: none"> • Be based on the needs of the child, not the disability. • Reflect that the team has given adequate consideration to meeting the student's needs in the regular classroom with supplementary aids and services. • Document that the nature or severity of the disability is such that education in regular education classes, even with the use of supplementary aids and services, cannot be achieved satisfactorily. • Describe potential harmful effects to the child or others, if applicable. <u>Systemic Correction</u> The district must submit evidence to OEC of written procedures and practices in place regarding least restrictive environment placement decision process. OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.	<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-6	300.321(1)	<p><u>Record Review</u> Four school age IEP(s) did not indicate that the IEP Team included a parent.</p> <p>All preschool IEP(s) did indicate that the IEP Team included a parent.</p>	<p><u>Individual Correction</u></p> <p>For the four IEP(s) identified as noncompliant, the district must:</p> <ul style="list-style-type: none"> • Provide evidence of parent participation at the IEP meeting, or • Provide documentation of at least three attempts made by the district to ensure parent participation, or • Reconvene the IEP team to review the IEP with the parent. <p><u>Systemic Correction</u></p> <p>The district must submit evidence to OEC of written procedures and practices in place regarding parent involvement in the IEP process.</p> <p>OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.</p>	<input checked="" type="checkbox"/> No The district does <u>not</u> need to address this finding in a Corrective Action Plan.
LRE-7	300.321(2)	<p><u>Record Review</u> Three school age and one preschool student IEP(s) did not indicate that the IEP Team included a regular education teacher.</p>	<p><u>Individual Correction</u></p> <p>For the four IEP(s) identified as noncompliant, the district must:</p> <ul style="list-style-type: none"> • Provide documentation that the parent was informed prior to the IEP meeting that the regular education teacher would not participate in the meeting, and • Provide a written excuse signed by the parents and the district that allowed the regular education teacher not to be in attendance at the IEP meeting, or • Reconvene the IEP team to review the IEP will all required members present. 	<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	
			<u>Systemic Correction</u> The district must submit evidence to OEC of written procedures and practices in place regarding regular education teacher 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.	
LRE-8	300.321(3)	<u>Record Review</u> One school age IEP(s) did not indicate that the IEP Team included a special education teacher. All preschool IEP(s) did indicate that the IEP Team included a special education teacher.	<u>Individual Correction</u> For the one IEP(s) identified as noncompliant, the district must: <ul style="list-style-type: none"> • Provide documentation that the parent was informed prior to the IEP meeting that the special education teacher would not participate in the meeting, and • Provide a written excuse signed by the parents and the district that allowed the special education teacher not to be in attendance at the IEP meeting, or • Reconvene the IEP team to review the IEP will all required members present. <u>Systemic Correction</u> The district must submit evidence to OEC of written procedures and practices in place regarding special education teacher 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-9	300.321(4)	<p><u>Record Review</u> Five school age IEP(s) did not indicate that the IEP Team included an LEA representative.</p> <p>All preschool IEP(s) did indicate that the IEP Team included an LEA representative.</p>	<p><u>Individual Correction</u></p> <p>For the five IEP(s) identified as noncompliant, the district must:</p> <ul style="list-style-type: none"> • Provide documentation that the parent was informed prior to the IEP meeting that the LEA representative would not participate in the meeting, and • Provide a written excuse signed by the parents and the district that allowed the LEA representative not to be in attendance at the IEP meeting, or • Reconvene the IEP team to review the IEP will all required members present. <p><u>Systemic Correction</u></p> <p>The district must submit evidence to OEC of written procedures and practices in place regarding LEA representative involvement in the IEP process.</p> <p>OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.</p>	<input checked="" type="checkbox"/> No The district does <u>not</u> need to address this finding in a Corrective Action Plan.
LRE-10	300.321(5)	<p><u>Record Review</u> All student IEP(s) indicated that the IEP Team included of a person qualified to interpret the instructional implications of evaluation results.</p>	<p><u>Individual Correction</u></p> <p>None</p> <p><u>Systemic Correction</u></p> <p>None</p>	<input checked="" type="checkbox"/> NA

Component 4: Data Verification

Each school district shall report timely and accurate special education event records for students with disabilities; have in effect an Individualized Education program for each child with a disability with the LEA's jurisdiction and in place on or before Dec. 1, 2009; conduct initial evaluations within 60 days of receiving parental consent for evaluation; have an IEP in place for three-year olds transitioning from Early Intervention Programs on or before the child's third birthday; and have a secondary transition place in place that meets all required elements for IDEA.

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
DV-1	300.645 R.C. 3301.07.14	<p><u>Record Review</u> One preschool student IEP(s) indicated that the child did not have an IEP in effect as reported on the LEA's December 1, 2010 Child Count Report.</p> <p>All school age students did have an IEP in effect as reported on the LEA's December 1, 2010 Child Count Report.</p>	<p><u>Individual Correction</u> ODE will make the necessary adjustments to the districts IDEA allocations due to the fact the child count was overstated by one record.</p> <p><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.</p>	<p><input checked="" type="checkbox"/> No The district does <u>not</u> need to address this finding in a Corrective Action Plan.</p>
DV-2	300.645 R.C. 3301.07.14	<p><u>Record Review</u> Two school age and one preschool student ETRs indicated that the child did not have an ETR in effect as reported on the LEA's December 1, 2010 Child Count Report.</p>	<p><u>Individual Correction</u> ODE will make the necessary adjustments to the districts IDEA allocations due to the fact the child count was overstated by three record(s).</p> <p><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.</p>	<p><input checked="" type="checkbox"/> No The district does <u>not</u> need to address this finding in a Corrective Action Plan.</p>

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
DV-3	SPP Indicator 20: Accurate and Timely Reporting of Special Education Event Record	<p><u>Record Review</u> Five school age records had inaccurate student data reported by the LEA through the Education Management Information System (EMIS) for the December 1, 2010 Child County Report, specifically in the following area(s):</p> <p>b) IEP date (IIEP, RIEP, TIEP, CIEP, or FIEP events)</p> <p>f) Disability category as indicated as an outcome of ETR</p> <p>All preschool records had accurate student data reported by the LEA.</p>	<p><u>Individual Correction</u> The district must provide evidence that they corrected the student data through their Student Information System (SIS).</p> <p><u>Systemic Correction</u> The district must submit evidence to OEC of written procedures and practices in place regarding data reporting.</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.
DV-4	SPP Indicator 11 300.301(c)(1)(i)	<p><u>Record Review</u> All initial evaluation(s) reported as being conducted within 60 days of the district receiving parental consent for the evaluation were conducted within the required timeline.</p>	<p><u>Individual Correction</u> None</p> <p><u>Systemic Correction</u> None</p>	<input checked="" type="checkbox"/> NA
DV-5	SPP Indicator 12 300.124	<p><u>Record Review</u> All preschool IEP(s) showed evidence that an IEP was in place for 3 year olds transitioning from Early Intervention Programs (0-3 years) on or before the child's third birthday.</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	
DV-6 A/B	SPP Indicator 20 for Secondary Transition Plans	<p><u>Record Review</u> One school age IEP(s) did not show evidence that the secondary transition plan reported in EMIS during 2010-2011 was in place that meets all eight required elements of IDEA for the student, specifically in the following area(s):</p> <ol style="list-style-type: none"> 1. There are appropriate measurable postsecondary goal(s). 2. The postsecondary goals are updated annually. 3. The postsecondary goals were based on age appropriate transition assessment. 4. There are transition services that will reasonably enable the student to meet the postsecondary goal(s). 5. The transition services include courses of study that will reasonably enable the student to meet the postsecondary goal(s). 6. The annual goal(s) are related to the student's transition service needs. 7. There is evidence the student was invited to the IEP Team Meeting where transition services were discussed. 8. When appropriate, there is evidence that a representative of any participating agency was invited to the IEP Team Meeting. 	<p><u>Individual Correction</u> One current IEP(s) did not contain transition plans that meet all eight required elements of IDEA. The district must reconvene the IEP teams to review and correct the secondary transition plan for the one record identified as still noncompliant or provide documentation of the student's withdrawal date.</p> <p><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</p>	<p><input checked="" type="checkbox"/> No The district does <u>not</u> need to address this finding in a Corrective Action Plan.</p>

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

Component 1: Statement of Accounts

District/School has submitted its FY11 IDEA Part B Regular (fund 516) and Pre-School (fund 587) ARRA FERs in the CCIP. The Financial Detail (FINDET) report and Accounting Report (ACCRPT) for those funds and the Final Expenditure Reports are consistent and in agreement. The District/School has provided copies of their FY12 IDEA Part B FINDET and ACCRPTs for the two funds. The reports show that expenditures for each fund to date are in line with the FY12 budget in the CCIP. 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	District/School has submitted its FY11 IDEA Part B Regular (fund 516) and Pre-School (fund 587) ARRA FERs in the CCIP. The Financial Detail (FINDET) report and Accounting Report (ACCRPT) for those funds and the Final Expenditure Reports are consistent and in agreement. The District/School has provided copies of their FY12 IDEA Part B FINDET and ACCRPTs for the two funds. The reports show that expenditures for each fund to date are in line with the FY12 budget in the CCIP.	<u>Individual Correction</u> None <u>Systemic Correction</u> None	<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	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; one of the IDEA funded positions was not an appropriate use of funds. The Sheriff paid out of ARRA funds in FY11 did not primarily benefit students with disabilities; districts ACCRPT and FER are in agreement.	<u>Individual Correction</u> The district must contact Grants Management regarding revising the FY11 ARRA FER due to the unallowable expenditures for the Sheriff. <u>Systemic Correction</u> None	<input checked="" type="checkbox"/> No

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	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

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	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.	<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 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	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.	<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.

Regulation 34 CFR	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
		Required Actions	
300.130 through 300.144	<p>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.</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.

Regulation 34 CFR	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
		Required Actions	
300.165 and Part 300.201	The district was unable to provide evidence that it had in accordance with 34 CFR 300.165, 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.	<p><u>Individual Correction</u> None</p> <p><u>Systemic Correction</u> Please provide a plan that will ensure the district is in compliance with the laws that follow.</p> <p>District must provide public notice and conduct public hearings per 34 CFR Part 300.165:</p> <p>(a) Prior to the adoption of any policies and procedures needed to comply with Part B of the Act (including any amendments to those policies and procedures), the State must ensure that there are public hearings, 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.</p> <p>(b) Before submitting a State plan under this part, a State must comply with the public participation requirements in paragraph (a) of this section and those in 20 U.S.C. 1232d(b)(7).</p> <p>34 CFR Part 300.201 reads “The LEA, in providing for the education of children with disabilities within its jurisdiction, must have in effect policies, procedures, and programs that <u>are consistent with the State policies</u> and procedures established under §§ 300.101 through 300.163, and §§ 300.165 through 300.174.” (Approved by the Office of Management and Budget under control number 1820–0030) (Authority: 20 U.S.C. 1412(a)(19); 20 U.S.C. 1232d(b)(7))</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 1/2 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	Not applicable	<u>Individual Correction</u> None <u>Systemic Correction</u> None	<input checked="" type="checkbox"/> NA

Gifted Education Review

A gifted education review to ensure compliance with state law and state *Operating Standards for Identifying and Serving Gifted Students* was conducted on November 10, 2011.

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, did the district spend for services to identified gifted students at least the same amount of state funding that it received in fiscal year 2009 through unit funding? In addition, did districts that in fiscal year 2009 received gifted student services from an ESC – and the ESC received gifted unit funding in fiscal year 2009 – either (a) obtain gifted student services from an ESC that are comparable to the gifted student services provided to the district with gifted unit funding in fiscal year 2009 by an ESC or (b) spend for services to identified gifted students from the funds received through the EBM an amount not less than the amount of gifted unit funding expended by an ESC in fiscal year 2009 for the district's students?

Citation	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
		Required Actions	
ORC 3306.09(G)	OEC reviewed district spending related to gifted education. 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?

Citation	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
		Required Actions	
OAC 3301-51-15(D)(4)	<p>WEPs for nine students were provided and reviewed. One WEP selected for review was not provided due to that SSID being provided by the district in error.</p> <p>Five WEPs did not list the general education teacher as a service provider as required in a co-teaching setting.</p> <p>As required, a blank WEP template was submitted by the district and was reviewed and approved by OEC in summer 2011. Upon further review of the completed WEPs, the deadline for next review and method and schedule for reporting progress to parents were not clear. WEPs should be revised so that there is a clear date for the next review and a schedule for reporting progress to parents.</p>	<p><u>Individual Correction</u></p> <p>The district must submit corrected copies of the WEPs to OEC for review. To obtain the student identification for these students, the district must contact Mike Demczyk, OEC educational consultant, directly at (614) 995-3354, toll-free (877) 644-6338 or by e-mail at michael.demczyk@ode.state.oh.us.</p> <p><u>Systemic Correction</u></p> <p>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.

Citation	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
		Required Actions	
ORC 3324.06(D)	Each gifted service offered in the district is available to all eligible students in each building in the district at that grade level. Services are available to all eligible students.	<u>Individual Correction</u> None <u>Systemic Correction</u> None	<input checked="" type="checkbox"/> NA

Component 4: Acceleration and Attestation

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

Citation	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
		Required Actions	
ORC 3324.10	<p>No WAPs were provided for early entrance to kindergarten, whole grade acceleration, subject acceleration or early graduation. The district provided evidence that they are implementing their acceleration policy.</p> <p>However, some requirements for early entrance specified on the district's Early Entrance/Acceleration Referral Form (AC-1) - including a 130 IQ score and a date of birth no later than January 1 - and on the district's Early Entrance/Acceleration Team Checklist do not align with the referral and evaluation process specified in the district's policy on Entrance Requirements (Policy 5112).</p>	<u>Individual Correction</u> None <u>Systemic Correction</u> The district must describe in the corrective action plan a process for updating the requirements specified on its Early Entrance/Acceleration Referral Form (AC-1) and on its Early Entrance/Acceleration Team Checklist that do not align with the referral and evaluation process specified in its Entrance Requirements (5112).	<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?

Citation	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
		Required Actions	
OAC 3301-51-15(E)(2)	Documentation was provided that verified district compliance. All requirements regarding percentage of time providing direct instruction and having other duties related to gifted education were met.	<u>Individual Correction</u> None <u>Systemic Correction</u> None	<input checked="" type="checkbox"/> NA

Component 6: Licensure Attestation

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

Citation	Evidence of Findings	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 for the gifted coordinator and the GISs were provided for review. Staff members hold the appropriate licensure or endorsement for the position of gifted coordinator and/or GIS.	<u>Individual Correction</u> None <u>Systemic Correction</u> None	<input checked="" type="checkbox"/> NA

Component 7: Requirement for Minutes of Service Attestation

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

Citation	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
		Required Actions	
OAC 3301-51-15(E)	The district attested that this requirement has been met.	<u>Individual Correction</u> None <u>Systemic Correction</u> None	<input checked="" type="checkbox"/> NA

Component 8: Requirement for Regular Education Teacher Professional Development

Are all general education teachers providing gifted services receiving professional development in teaching gifted students and ongoing assistance with curriculum development and instruction from a gifted specialist and is curriculum related to gifted services differentiated?

Citation	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
		Required Actions	
OAC 3301-51-15(D)(3)(b)(i)	The district attested that this requirement has been met.	<u>Individual Correction</u> None <u>Systemic Correction</u> None	<input checked="" type="checkbox"/> NA