

Niles City School District IRN 044495
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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 May 1, 2 and 3, 2012 by the Ohio Department of Education's Office for Exceptional Children (OEC) and Office of Early Learning and School Readiness (OEL&SR) as part of its general supervision requirements under the Individuals with Disabilities Education Act (IDEA) and Am. Sub. HB1. The onsite visit consisted of the following reviews:

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

IDEA Review

Overview

Educational consultants from the Office for Exceptional Children (OEC) conducted IDEA review activities on May 1 - 3, 2012. During the IDEA Review, OEC consultants monitor the LEA's implementation of the IDEA to ensure compliance. The primary focus of the IDEA Review is to:

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

OEC focused the review on the following areas:

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

Data Sources

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

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

On April 24, 2012, Niles City Schools mailed and sent home 393 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 April 23, 2012 on their website.

On May 2, 2012, OEC consultants held a public meeting for parents and other interested parties. Public parent meeting dates for all districts selected for IDEA Reviews are posted on the ODE website. Five parents and one State Support Team (SST) Region 5 representatives attended the public meeting. Attendees could speak to OEC representatives publicly in the meeting or individually, provide written comments, or both. Five parents made comments during the public meeting. Written comment forms were available before, during and after the meeting.

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

2. Pre-Onsite Data Analysis

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

3. Record Review

On May 1 and 2, 2012, OEC consultants reviewed 41 records of school age students with disabilities. An OEL&SR consultant, on May 3, 2012, reviewed six records as part of the Early Childhood Special Education Review. OEC selected records of a variety of children with disabilities from four buildings.

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

4. Staff/Administrative Interviews

On May 3, 2012, OEC consultants held three sessions of interviews with five administrators and 17 teachers, related services personnel and school psychologists. OEC interviews focused on the following review areas: Child Find; Delivery of Services; Least Restrictive Environment (LRE) and IEP alignment.

Findings

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

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

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

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

Corrective Action Plan (CAP)

The *Review of Findings and District Required Actions* identifies the noncompliance which must be addressed in the corrective action plan developed by the Niles 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 Karla Spangler, OEC Lead Consultant at esclew_ks@sstr1.org within 30 school days from the date of this report. OEC will review the action plan submitted by the district for approval. If OEC deems that a revision(s) is necessary, the district will be required to revise and resubmit. The district will be contacted by the OEC Lead Consultant and notified when the action plan has been approved.

CAP Due Date: 10-08-2012

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: 11-26-2012

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: 06-06-2013

For questions about specific components of this report please contact:

Special Education School Age: Karla Spangler, OEC Lead Consultant, at (419) 376-5340, toll-free at (877) 644-6338, or by e-mail at esclew_ks@sstr1.org.

Special Education Early Childhood: Edith Greer, Educational Consultant, at (330) 308-9939, or by e-mail at Edith.Greer@ecoesc.org

Fiscal: Mark Lynskey, Educational Consultant, at (614) 644-8861, toll-free at (877) 644-6338, or by e-mail at mark.lynskey@education.ohio.gov.

Gifted Education: Rosemary Pearson, Educational Consultant, at (614) 644-2641, toll-free at (877) 644-6338, or by e-mail at rosemary.pearson@education.ohio.gov

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>All reevaluation records indicated that the child's reevaluation was completed within the three year timeline.</p>	<p><u>Individual Correction</u></p> <p>None</p> <p><u>Systemic Correction</u></p> <p>None</p>	<input checked="" type="checkbox"/> NA
CF-2	300.305(a)	<p><u>Record Review</u></p> <p>All preschool evaluation records 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.</p>	<p><u>Individual Correction</u></p> <p>None</p> <p><u>Systemic Correction</u></p> <p>None</p>	<input checked="" type="checkbox"/> NA
CF-3	OAC 3301-51-06 (2) and OAC 3301-51-06(4)	<p><u>Record Review</u></p> <p>Two school age initial evaluations did not appropriately document interventions provided to resolve concerns for the child performing below grade-level standards.</p> <p><u>Interviews</u></p> <p>Interventions are being done, but are not always listed in the ETR.</p>	<p><u>Individual Correction</u></p> <p>OEC has verified that these students have a current IEP in place, so no additional individual correction is required.</p> <p><u>Systemic Correction</u></p> <p>The district must submit evidence to OEC of written procedures and practices in place regarding documentation of intervention and supports provided prior to completion of the initial evaluation team report.</p> <p>OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.</p>	<input checked="" type="checkbox"/> Yes A Corrective Action Plan is required due to meeting the 30% threshold of non-compliance.

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>Two school age records did not show evidence that the evaluation planning team included the parent.</p> <p>All preschool records showed evidence that the evaluation planning team included the parent.</p>	<p><u>Individual Correction</u></p> <p>The district must provide evidence that the parent was involved or provided the opportunity to participate (three documented attempts) in the evaluation planning process.</p> <p>The evidence may include; evaluation planning form, prior written notice, parent invitation, referral form or communication log.</p> <p><u>Systemic Correction</u></p> <p>The district must submit evidence to OEC of written procedures and practices in place regarding the evaluation planning process to include the parent.</p> <p>OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.</p>	<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-5	300.305(a)(1)	<p><u>Record Review</u></p> <p>Two school age evaluations did not provide evidence that the evaluation planning team reviewed existing data on the child.</p> <p>All preschool evaluations provided evidence that the evaluation planning team reviewed existing data on the child.</p>	<p><u>Individual Correction</u></p> <p>The district must provide the evaluation planning form or evidence documenting existing data was reviewed during the evaluation planning process. If not, the IEP team must reconvene the ETR planning and ETR meeting.</p> <p><u>Systemic Correction</u></p> <p>The district must submit evidence to OEC of written procedures and practices in place to review existing data during the evaluation planning.</p> <p>OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.</p>	<p><input checked="" type="checkbox"/> No</p> <p>The district does <u>not</u> need to address this finding in a Corrective Action Plan.</p>

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>Three school age evaluations did not provide evidence that the evaluation planning team identified what additional data, if any, were needed.</p> <p>All preschool evaluations provided evidence that the evaluation planning team identified what additional data, if any, were needed.</p> <p><u>Interviews</u></p> <p>The teachers are co-teaching and discuss the additional data needed during that time.</p>	<p><u>Individual Correction</u></p> <p>The district must provide the evaluation planning form or evidence documenting additional data, if any was reviewed during the evaluation planning process. If not, the IEP team must reconvene the ETR planning and ETR meeting.</p> <p><u>Systemic Correction</u></p> <p>The district must submit evidence to OEC of written procedures and practices in place to review additional data, if any during evaluation planning.</p> <p>OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.</p>	<p><input checked="" type="checkbox"/> No</p> <p>The district does <u>not</u> need to address this finding in a Corrective Action Plan.</p>
CF-7	300.304(c)(4); OAC 3301-51-01; and OAC 3301-51-06	<p><u>Record Review</u></p> <p>Four school age evaluations did not provide evidence that the evaluation addresses all areas related to the suspected disability.</p> <p>All preschool evaluations provided evidence that the evaluation addresses all areas related to the suspected disability.</p>	<p><u>Individual Correction</u></p> <p>The district will convene the ETR team to conduct a reevaluation and provide evidence that the evaluation addresses all areas related to the suspected disability.</p> <p><u>Systemic Correction</u></p> <p>The district must submit evidence to OEC of written procedures and practices in place to provide evidence that the evaluation addresses all areas related to the suspected disability.</p> <p>OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.</p>	<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)	<u>Record Review</u> All school age and preschool records showed evidence that the parent of the child was 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-9	300.306(a)(1)	<u>Record Review</u> All school age and preschool initial evaluations showed evidence that a group of qualified professionals as appropriate to the suspected disability was 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> Three school age reevaluations did not show evidence that a group of qualified professionals as appropriate to the suspected disability were involved in determining whether the child is a child with a disability. All preschool reevaluations showed evidence that a group of qualified professionals as appropriate to the suspected disability were involved in determining whether the child is a child with a disability.	<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"> 1. Parent 2. Regular Education Teacher 3. Special Education Provider 4. District Representative 5. An individual who can interpret the instructional implications of evaluation results, 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; 7. Whenever appropriate, the child with a disability. <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>One school age IEP 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>Administrators and teachers believe that they are delivering services appropriately to all students. They have a continuum of services in their buildings, for all disabilities, with the exception of ED at the high school.</p>	<p><u>Individual Correction</u></p> <p>The district must reconvene the IEP team of the one IEP identified as noncompliant to review and amend the IEP to include a statement of how the child's disability affects the child's participation in appropriate activities to access, participate and progress in the general education curriculum.</p> <p><u>Systemic Correction</u></p> <p>The district must submit evidence to OEC of written procedures and practices in place regarding the involvement and progress of children with disabilities in the general education curriculum and assessing how their disability affects that involvement.</p> <p>OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.</p>	<p><input checked="" type="checkbox"/> No</p> <p>The district does <u>not</u> need to address this finding in a Corrective Action Plan.</p>

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
DS-2	300.320(a)(1)	<p><u>Record Review</u></p> <p>Thirteen school age IEPs did not contain Present Levels of Academic Achievement and Functional Performance (PLOP) that addressed the needs of the student.</p> <p>All preschool IEPs contained 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 teams of the 13 IEPs identified as noncompliant to review and amend the PLOP related to each goal to include:</p> <ul style="list-style-type: none"> • A summary of current daily academic/behavior and/or functional performance (strengths and needs); • Baseline data provided for developing a measurable goal. • For preschool, the PLOP should relate to the child's developmental domains, functional performance and pre-academic skills. <p><u>Systemic Correction</u></p> <p>The district must submit evidence to OEC of written procedures and practices in place regarding the review of current academic/functional data when writing IEPs.</p> <p>OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.</p>	<p><input checked="" type="checkbox"/> Yes</p> <p>A Corrective Action Plan is required due to meeting the 30% threshold of non-compliance.</p>
DS-3	300.320 (a)(2)(i)(A)	<p><u>Record Review</u></p> <p>Five school age IEPs did not contain annual goals that address the child's academic area(s) of need.</p> <p>All preschool IEPs contained annual goals that address the child's academic area(s) of need.</p>	<p><u>Individual Correction</u></p> <p>The district must reconvene the IEP teams of the five IEPs identified as noncompliant to review and amend the IEP to include annual goals that address the academic needs that were identified in the IEP or provide evidence that the IEP team, based on the severity of the needs of the child, decided to prioritize addressing the needs.</p> <p><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>Eleven school age IEPs did not contain annual goals that address the child's functional area(s) of need.</p> <p>All preschool IEPs contained annual goals that address the child's functional area(s) of need.</p>	<p><u>Individual Correction</u></p> <p>The district must reconvene the IEP teams of the 11 IEPs identified as noncompliant to review and amend the IEP to include annual goals that address the functional needs that were identified in the IEP or provide evidence that the IEP team, based on the severity of the needs of the child, decided to prioritize addressing the needs</p> <p><u>Systemic Correction</u></p> <p>The district must submit evidence to OEC of written procedures and practices in place regarding the IEP process of addressing identified functional needs.</p> <p>OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.</p>	<p><input checked="" type="checkbox"/> Yes</p> <p>A Corrective Action Plan is required due to meeting the 30% threshold of non-compliance.</p>
DS-5	300.320(a)(2)(i)	<p><u>Record Review</u></p> <p>Thirteen school age and six preschool IEPs did not contain measurable annual goals.</p>	<p><u>Individual Correction</u></p> <p>The district must reconvene the IEP teams of the 19 IEPs identified as noncompliant to review and amend annual goals to contain the following six critical elements:</p> <ol style="list-style-type: none"> 1. Who? 2. Will Do What? 3. To What Level of Degree? 4. Under What Conditions? 5. In What Length of Time? 6. How Will Progress Be Measured? <p><u>Systemic Correction</u></p> <p>The district must implement new procedures to ensure that annual goals written subsequent to this report will include the following six critical elements to demonstrate correction:</p> <ol style="list-style-type: none"> 1. Who? 2. Will Do What? 3. To What Level of Degree? 4. Under What Conditions? 5. In What Length of Time? 6. How Will Progress Be Measured? <p>OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.</p>	<p><input checked="" type="checkbox"/> Yes</p> <p>A Corrective Action Plan is required due to meeting the 30% threshold of non-compliance.</p>

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
DS-6	300.320(a)(4)	<p><u>Record Review</u></p> <p>Thirteen school age and four preschool IEPs did not contain a statement of specially designed instruction that addresses the needs of the child and supports annual goals.</p>	<p><u>Individual Correction</u></p> <p>The district must reconvene the IEP teams of the 17 IEPs identified as noncompliant to review and amend the specially designed instruction to describe the adaption of, as appropriate to the needs of the child, the content, methodology, or delivery of instruction.</p> <p><u>Systemic Correction</u></p> <p>The district must submit evidence to OEC of written procedures and practices in place regarding the IEP process of determining specially designed instruction.</p> <p>OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.</p>	<p><input checked="" type="checkbox"/> Yes</p> <p>A Corrective Action Plan is required due to meeting the 30% threshold of non-compliance.</p>
DS-7	300.320(a)(7)	<p><u>Record Review</u></p> <p>Twelve school age IEPs did not indicate the location where the specially designed instruction will be provided.</p> <p>All preschool IEPs indicated the location where the specially designed instruction will be provided.</p>	<p><u>Individual Correction</u></p> <p>The district must reconvene the IEP teams of the 12 IEPs identified as noncompliant to review and amend the location where the specially designed instruction will be provided.</p> <p><u>Systemic Correction</u></p> <p>The district must submit evidence to OEC of written procedures and practices in place regarding the IEP process of determining the location where specially designed instruction will occur.</p> <p>OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.</p>	<p><input checked="" type="checkbox"/> 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></p> <p>Seven school age and two preschool IEPs did not indicate the amount of time and frequency of the specially designed instruction.</p>	<p><u>Individual Correction</u></p> <p>The district must reconvene the IEP teams of the nine IEPs identified as noncompliant to review and amend the amount of time and frequency of the specially designed instruction.</p> <p><u>Systemic Correction</u></p> <p>The district must submit evidence to OEC of written procedures and practices in place regarding the IEP process of determining the amount and frequency of specially designed instruction to be provided.</p> <p>OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.</p>	<p><input checked="" type="checkbox"/> No</p> <p>The district does <u>not</u> need to address this finding in a Corrective Action Plan.</p>
DS-9	300.320(a)(4)	<p><u>Record Review</u></p> <p>Nine school age IEPs did not identify related services that address the needs of the child and support the annual goals.</p> <p>All preschool IEPs identified related services that address the needs of the child and support the annual goals.</p>	<p><u>Individual Correction</u></p> <p>The district must reconvene the IEP teams of the nine IEPs identified as noncompliant to review and amend the IEP to include related services that were identified as needed in the IEP.</p> <p><u>Systemic Correction</u></p> <p>The district must submit evidence to OEC of written procedures and practices in place regarding the IEP process of addressing identified related service needs.</p> <p>OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.</p>	<p><input checked="" type="checkbox"/> Yes</p> <p>A Corrective Action Plan is required due to meeting the 30% threshold of non-compliance.</p>

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
DS-10	300.320(a)(7)	<p><u>Record Review</u></p> <p>Three school age IEPs did not indicate the location where the related services will be provided.</p> <p>All preschool IEPs indicated the location where the related services will be provided.</p>	<p><u>Individual Correction</u></p> <p>The district must reconvene the IEP teams of the three IEPs identified as noncompliant to review and amend the IEP to include the location where the related services will be provided.</p> <p><u>Systemic Correction</u></p> <p>The district must submit evidence to OEC of written procedures and practices in place regarding the IEP process of determining the location where related services will occur.</p> <p>OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.</p>	<p><input checked="" type="checkbox"/> No</p> <p>The district does <u>not</u> need to address this finding in a Corrective Action Plan.</p>
DS-11	300.320(a)(7)	<p><u>Record Review</u></p> <p>Two school age IEPs did not indicate the amount of time and frequency of the related services to be provided.</p> <p>All preschool IEPs indicated the amount of time and frequency of the related services to be provided.</p>	<p><u>Individual Correction</u></p> <p>The district must reconvene the IEP teams of the two IEPs identified as noncompliant to review and amend on the IEP the amount of time and frequency of the related services to be provided.</p> <p><u>Systemic Correction</u></p> <p>The district must submit evidence to OEC of written procedures and practices in place regarding the IEP process of determining the amount and frequency of related services to be provided.</p> <p>OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.</p>	<p><input checked="" type="checkbox"/> No</p> <p>The district does <u>not</u> need to address this finding in a Corrective Action Plan.</p>

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

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

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
LRE-1	300.324(a)(2)(v)	<p><u>Record Review</u></p> <p>One school age student IEP did not identify assistive technology to enable the child to be involved in and make progress in the general education curriculum.</p>	<p><u>Individual Correction</u></p> <p>The district must reconvene the IEP team of the one IEP identified as noncompliant to review assistive technology and/or services that would directly assist the child with a disability to increase, maintain, or improve their functional capabilities and include them on the IEP.</p> <p><u>Systemic Correction</u></p> <p>The district must submit evidence to OEC of written procedures and practices in place regarding assistive technology.</p> <p>OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.</p>	<p><input checked="" type="checkbox"/> No</p> <p>The district does <u>not</u> need to address this finding in a Corrective Action Plan.</p>
LRE-2	300.320(a)(6)(i)	<p><u>Record Review</u></p> <p>All school age and preschool student IEPs identified accommodations provided to enable the child to be involved in and make progress in the general education curriculum</p>	<p><u>Individual Correction</u></p> <p>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	
LRE-3	300.320(a)(4)	<u>Record Review</u> Three school age IEPs did not identify modifications to enable the child to be involved in and make progress in the general education curriculum.	<u>Individual Correction</u> The district must reconvene the IEP teams of the three IEPs identified as noncompliant to review the modifications that would alter the amount or complexity of materials or the performance expected of the child from grade level curriculum expectations and include them on the IEP. <u>Systemic Correction</u> The district must submit evidence to OEC of written procedures and practices in place regarding modifications. OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.	<input checked="" type="checkbox"/> No The district does <u>not</u> need to address this finding in a Corrective Action Plan.
LRE-4	300.320(a)(4)	<u>Record Review</u> All school age IEPs identified supports for school personnel to enable the child to be involved in and make progress in the general education curriculum.	<u>Individual Correction</u> None <u>Systemic Correction</u> None	<input checked="" type="checkbox"/> NA

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
LRE-5	300.320(a)(5)	<p><u>Record Review</u></p> <p>Thirteen school age and one preschool IEPs did not include an explanation of the extent to which the child will not participate with nondisabled children in the regular education classroom.</p> <p><u>Interviews</u></p> <p>During the interview process, it was noted that there is not a continuum of services for all disability categories.</p>	<p><u>Individual Correction</u></p> <p>The district must reconvene the IEP teams of the 14 IEPs identified as noncompliant to review and include a justification for why the child was removed from the regular education classroom.</p> <p>The justification should:</p> <ul style="list-style-type: none"> • Be based on the needs of the child, not the disability. • Reflect that the team has given adequate consideration to meeting the student's needs in the regular classroom with supplementary aids and services. • Document that the nature or severity of the disability is such that education in regular education classes, even with the use of supplementary aids and services, cannot be achieved satisfactorily. • Describe potential harmful effects to the child or others, if applicable. <p><u>Systemic Correction</u></p> <p>The district must submit evidence to OEC of written procedures and practices in place regarding least restrictive environment placement decision process.</p> <p>OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.</p>	<p><input checked="" type="checkbox"/> Yes</p> <p>A Corrective Action Plan is required due to meeting the 30% threshold of non-compliance.</p>

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
LRE-6	300.321(1)	<u>Record Review</u> All school age and preschool student IEPs indicated that the IEP Team included a parent.	<u>Individual Correction</u> None <u>Systemic Correction</u> None	<input checked="" type="checkbox"/> NA
LRE-7	300.321(2)	<u>Record Review</u> All school age and preschool IEPs indicated that the IEP Team included a regular education teacher.	<u>Individual Correction</u> None <u>Systemic Correction</u> None	<input checked="" type="checkbox"/> NA
LRE-8	300.321(3)	<u>Record Review</u> All school age and preschool IEPs indicated that the IEP Team included a special education teacher.	<u>Individual Correction</u> None <u>Systemic Correction</u> None	<input checked="" type="checkbox"/> NA
LRE-9	300.321(4)	<u>Record Review</u> All school age and preschool IEPs indicated that the IEP Team included an LEA representative.	<u>Individual Correction</u> None <u>Systemic Correction</u> None	<input checked="" type="checkbox"/> NA
LRE-10	300.321(5)	<u>Record Review</u> All school age and preschool IEPs indicated that the IEP Team included of a person qualified to interpret the instructional implications of evaluation results.	<u>Individual Correction</u> None <u>Systemic Correction</u> None	<input checked="" type="checkbox"/> NA

Component 4: Data Verification

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

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
DV-1	300.645 R.C. 3301.07.14	<u>Record Review</u> All school age and preschool IEPs indicated that the child did have an IEP in effect as reported on the LEA's December 1, 2010 Child Count Report.	<u>Individual Correction</u> None <u>Systemic Correction</u> None	<input checked="" type="checkbox"/> NA
DV-2	300.645 R.C. 3301.07.14	<u>Record Review</u> All school age and preschool student ETRs indicated that the child had an ETR in effect as reported on the LEA's December 1, 2010 Child Count Report.	<u>Individual Correction</u> None <u>Systemic Correction</u> None	<input checked="" type="checkbox"/> NA
DV-3	SPP Indicator 20: Accurate and Timely Reporting of Special Education Event Record	<u>Record Review</u> 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 Count Report, specifically in the following area(s): a) DOB b) IEP date (IIEP, RIEP, TIEP, CIEP, or FIEP events) c) ETR dates (IETR, RETR, TETR) d) Referral date e) Consent date f) Disability category as indicated as an outcome of ETR g) Admission date h) Withdrawal date i) Non-compliance reason for ETR or IEP date	<u>Individual Correction</u> The district must provide evidence that they corrected the student data through their Student Information System (SIS). <u>Systemic Correction</u> The district must submit evidence to OEC of written procedures and practices in place regarding data reporting. OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.	<input checked="" type="checkbox"/> No The district does <u>not</u> need to address this finding in a Corrective Action Plan.

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
DV-4	SPP Indicator 11 300.301(c)(1)(i)	<u>Record Review</u> All school age and preschool initial evaluations reported as being conducted within 60 days of the district receiving parental consent for the evaluation was conducted within the required timeline.	<u>Individual Correction</u> None <u>Systemic Correction</u> None	<input checked="" type="checkbox"/> NA
DV-5	SPP Indicator 12 300.124	<u>Record Review</u> All preschool IEPs showed evidence that an IEP was in place for 3 year olds transitioning from Early Intervention Programs (0-3 years) on or before the child's third birthday.	<u>Individual Correction</u> None <u>Systemic Correction</u> None	<input checked="" type="checkbox"/> NA
DV-6 A/B		<u>Record Review</u> Nine school age IEPs did not show evidence that the secondary transition plan reported in EMIS during 2010-2011 was in place that meets all 8 required elements of IDEA for the student, specifically in the following area(s): <ol style="list-style-type: none"> 1. There are appropriate measurable postsecondary goal(s). 2. The postsecondary goals are updated annually. 3. The postsecondary goals were based on age appropriate transition assessment. 4. There are transition services that will reasonably enable the student to meet the postsecondary goal(s). 5. The transition services include courses of study that will reasonably enable the student to meet the postsecondary goal(s). 6. The annual goal(s) are related to the student's transition service needs. 7. There is evidence the student was invited to the IEP Team Meeting where transition services were discussed. 8. When appropriate, there is evidence that a representative of any participating agency was invited to the IEP Team Meeting. 	<u>Individual Correction</u> OEC has verified that three students have current IEPs that contain transition plans that meet all 8 required elements of IDEA, so no additional individual correction is required. Six current IEPs did not contain transition plans that meet all 8 required elements of IDEA. The district must reconvene the IEP teams to review and correct the secondary transition plans for the six records identified as still noncompliant or provide documentation of the student's withdrawal date. <u>Systemic Correction</u> The district must submit evidence to OEC of written procedures and practices in place regarding data reporting. OEC will contact the district for submission of new records and review these records to determine compliance with this regulation	<input checked="" type="checkbox"/> Yes A Corrective Action Plan is required due to meeting the 30% threshold of non-compliance.

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

Component 1: Statement of Accounts

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

Findings Citation	Evidence	Evidence of Correction		Must be addressed in CAP
		Required Actions	Date Due	
300.202	<p>Niles City School's treasurer provided the (Fund 516) FY11 Part B ARRA and the FY12 Part B FINDETs. The amounts documented in the FY11 reports were in alignment with the FY11 budget and are in agreement with the amount FY11 Part B ARRA FER in the CCIP.</p> <p>The amounts reported in the FY12 FINDET to date were consistent with the FY12 Part B budget and were in alignment with appropriate spending.</p> <p>Nile City Schools is part of the Trumbull Co. ESC consortium, and as part of that agreement, the ESC receives the Part B Early Childhood Special Education funds and provides services to the district. The ESC then tracks the expenditures for the district and reports their use in the CCIP.</p>	<p><u>Individual Correction</u> None</p> <p><u>Systemic Correction</u> None</p>	<p>N/A</p> <p>N/A</p>	<p><input checked="" type="checkbox"/> NA</p>

Component 2: Payroll Expenditures

The district/school is able to document that the federal funds were expended for an appropriate purpose; payroll expenditures are supported by Time and Effort Logs or Semi-Annual Certification; expense were properly coded to the correct function and object code; all staff in certified positions have appropriate licensure; all funded positions have position descriptions; district's ACCRPTs and FERs are in agreement.

Findings Citation	Evidence	Evidence of Correction		Must be addressed in CAP
		Required Actions	Date Due	
300.202	<p>The FY12 Fund 516 FINDET listed 10 full time staff and 15 substitutes who were funded through Part B funds. Staff included educational aides, Intervention Specialists, and a School Psychologist. Expenditures were appropriate and in alignment with the budget. Staff held appropriate licensure. Semi-Annual certifications or time and effort logs were present for all staff.</p> <p>The FY11 ARRA FINDET showed that 3 fully and partially-funded staff persons were funded through Part B ARRA funds, as well as 18 substitutes. Primarily funded were two Intervention Specialists and a nurse. Position descriptions were presented, as well as Semi-Annual Certifications. The Personal Activity Reports (PAR) detailed the services provided and the primary source of the outlay of funds. Expenditures were appropriate and in agreement with the FER. Staff held appropriate licensure.</p> <p>Trumbull Co. ESC maintains the Semi-Annual Certification for staff contracted for services through the Consortium Agreement.</p> <p>Coding was determined to be appropriate for all staff. Niles City Schools was in compliance in their use of Part B funds in this section of the review.</p>	<p><u>Individual Correction</u> None</p> <p><u>Systemic Correction</u> None</p>	<p>N/A</p> <p>N/A</p>	<p><input checked="" type="checkbox"/> NA</p>

Component 3: Non-Payroll Expenditures

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

Findings Citation	Evidence	Evidence of Correction		Must be addressed in CAP
		Required Actions	Date Due	
300.202	<p>From details in the FINDETs, the district treasure was provided a list of 24 vouchers to be reviewed from FY11 & 12 Fund 516, SSCs 9320 and 9012. The district provided complete information, including the voucher, invoice, purchase order or receipt for each item. Each expenditure was determined to have an appropriate public purpose and to be satisfactory for the program.</p> <p>Two coding issues were identified.</p> <ol style="list-style-type: none"> 1. Of the 24 vouchers reviewed, 10 showed the function code of 1239 – Other Handicaps. In some cases, the benefits of the materials purchased would go across several classrooms or ranges of students, so the coding was appropriate. However, in other cases, a single item was purchased for a specific student or service. The coding of such items must accurately identify the instructional program wherein the item will be utilized. The Treasurer's office and Special Education office must communicate more closely to assure accurate/applicable coding of purchases. 2. In three cases, object code errors were identified wherein improper codes were used in purchases. The Treasurer's office and Special Education office must communicate more closely to assure accurate coding of purchases. 	<p><u>Individual Correction</u> Niles City Treasure's office will correct the object code for FY12 vouchers 49948, 50578 and 51063 to reflect the appropriate expenditure detail.</p> <p><u>Systemic Correction</u> None</p> <p><u>Comment</u> To ensure accuracy in the determination of the funding codes as purchase orders are sent from one office to the other, it is recommended that the Treasurer's Office and the Special Education Office establish a procedure to identify the proper object and function codes in the initial phases of the purchase process. Persons with clear knowledge of items being purchased must have access to and make use of the USAS manual to ensure accuracy.</p>	<p>Individual Correction for Fiscal Requires the following due date:</p> <p>30 days from receipt of this report.</p>	<input checked="" type="checkbox"/> No

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

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

Findings Citation	Evidence	Evidence of Correction		Must be addressed in CAP
		Required Actions	Date Due	
300.202	<p>Niles City School’s treasurer’s office provided a copy of its Inventory Policy and its Disposal Policy. The district did not provide a Procurement Policy.</p> <p>The Inventory Policy states that the district will conduct a complete inventory every five years of all district owned equipment and supplies. This policy is not in agreement with 34 CFR 80.32, (c)(4)(d)(2); which requires a physical inventory of property to be taken and results reconciled at least once every two years. The district policy also states that supplies will be included in the five-year inventory, which is acceptable but above the inventory requirements.</p> <p>The Disposal Policy did not direct the placement of funds that may result from the sale of items initially purchased with federal funds.</p>	<p><u>Individual Correction</u></p> <p>Niles City Schools must provide a copy of its Board-adopted Procurement Policy that will be in compliance with both State and Federal laws and procedures.</p> <p>Niles City Schools must review its current Inventory Policy to determine its consistency with 34 CFR 80.32. The compliant policy must provide for the appropriate timeline for review of inventory.</p> <p>Niles City Schools Disposal Policy must include the disposition of the proceeds from the sale of any inventoried items.</p> <p><u>Systemic Correction</u></p> <p>N/A</p>	<p>Individual Correction for Fiscal Requires the following due date:</p> <p>30 days from receipt of this report.</p>	<p><input checked="" type="checkbox"/> Yes</p>

Component 5: Equipment inventory policy and procedures

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

Findings Citation	Evidence	Evidence of Correction		Must be addressed in CAP
		Required Actions	Date Due	
300.202	The treasurer provided a copy of the complete list of items purchased with IDEA funds, which by definition may be considered either supplies or equipment. The inventory list was comprehensive, including all required points in the identification and maintenance of the inventoried items. A concerted effort was made to locate and verify a sampling of the items on the inventory list, however, after being unable to locate 90% of the items being sought, it was determined that the problem of being able to validate the inventory list is systemic and could not be completed. Items were listed that we not in the proper location; items were found in rooms with either old or new labels that could not be found on the inventory list, and because of the closure/reorganization of several buildings, too high a level of error existed to make the inventory review possible.	<p><u>Individual Correction</u></p> <p>The district must identify the appropriate staff members to 1) locate and appropriately tag each item purchased with IDEA funds that meets the inventory definition, both those that appear on the inventory list and those items that were so purchased but are not on the list, and, 2) update the IDEA Part B Inventory List to include the accurate location of each item.</p> <p><u>Systemic Correction</u></p> <p>Niles City Schools must implement its Inventory Policy. The inventory list must be updated to accurately identify each item on the list and include each required piece of information. Per district policy, the federal program coordinator will assure the accuracy of the record of items purchased with federal funds; however, the policy cites that the district treasurer is ultimately responsible for the accuracy and completeness of the list. The Treasurer's role as well as the principals' roles must be stressed and required in order to correct this finding.</p>	<p><u>Individual Correction</u></p> <p>Individual Correction for Fiscal Requires the following due date: June 6, 2013</p> <p><u>Systemic Correction:</u></p> <p>The completed and accurate inventory list must be provided by June 6, 2013.</p> <p>Recheck of physical inventory will be completed as soon as possible after that date.</p>	<input checked="" type="checkbox"/> Yes

Component 6: Non-Public Count and Proportionate Share

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

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

Findings Citation	Evidence	Evidence of Correction		Must be addressed in CAP
		Required Actions	Date Due	
300.130 through 300.144	<p>Niles City Schools Special Education Supervisor provided information pertaining to the child find process with the non-public school and community.</p> <p>The Supervisor also provided information addressing the timely and meaningful consultation with the non-public school.</p> <p>The Supervisor provided a copy of the listing of students referred, evaluated, the number of children determined to be a child with a disability, and the number of students served in the non-public school.</p> <p>The Supervisor also described and provided documentation on the use of IDEA funds to meet the needs of the identified students.</p>	<p>In meeting the intent of IDEA, 34 CFR, Part 300.131, Niles City Schools must broaden its communication to the non-public school and the community in general to advise them of the district's Child Find services. This specific activity is separate from other announcements and activities and must be a general announcement of the district's intent to identify children potentially eligible for special education services.</p> <p><u>Individual Correction</u> Niles City Schools must publicize its intent to locate, identify and evaluate all children with disabilities located in the school district served by the LEA.</p> <p><u>Systemic Correction</u> In meeting the intent of IDEA, 34 CFR, Part 300.131, Niles City Schools must clarify the process through which it will communicate with the non-public school and the community in general to advise them of the district's Child Find services.</p>	<p><u>Individual Correction</u> Individual Correction for Fiscal Requires the following due date: December 31, 2012</p> <p><u>Systemic Correction:</u> June 6, 2013</p>	<input checked="" type="checkbox"/> Yes

Component 7: Notification of Public Participation

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

Findings Citation	Evidence	Evidence of Correction		Must be addressed in CAP
		Required Actions	Date Due	
300.165 and Part 300.201	Niles City Schools Special Education Supervisor provided copies of notification of public participation. The announcements were clear and detailed and in general met the intent of 34 CFR 300.165.	<u>Individual Correction</u>	N/A	<input checked="" type="checkbox"/> NA
		None		
		<u>Systemic Correction</u>	N/A	
		None		

Component 8: Redirection of funds

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

If the district/school reduced its local expenditure, it was by no more than 1/2 of its additional allocation amount and the district can document the expenditures/reduction and the amount is shown in the CCIP.

Findings Citation	Evidence	Evidence of Correction		Must be addressed in CAP
		Required Actions	Date Due	
300.205	No funds were redirected to reduce local maintenance of effort. Comprehensive Early Intervening Services were not offered. There were no items to review in this section.	<u>Individual Correction</u>	N/A	<input checked="" type="checkbox"/> NA
		None		
		<u>Systemic Correction</u>	N/A	
		None		

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 May 3, 2012 by Rosemary Pearson.

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

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

Component 1: Gifted Budget

Based on Am. Sub. HB 1, did the district spend for services to identified gifted students at least the same amount of state funding that it received in fiscal year 2009 through unit funding? In addition, did districts that in fiscal year 2009 received gifted student services from an ESC – and the ESC received gifted unit funding in fiscal year 2009 – either (a) obtain gifted student services from an ESC that are comparable to the gifted student services provided to the district with gifted unit funding in fiscal year 2009 by an ESC or (b) spend for services to identified gifted students from the funds received through the EBM an amount not less than the amount of gifted unit funding expended by an ESC in fiscal year 2009 for the district's students?

Citation	Evidence of Findings	Evidence of Correction	
		Required Actions	Must be addressed in CAP
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?

Citation	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
		Required Actions	
OAC 3301-51-15(D)(4)	WEPs for ten students were provided and reviewed. The WEPs do not include a date for the next review and a means of assuring that parents receive a copy of the WEP. All WEPs reviewed contained identical goals. Goals should be individual and match the needs and areas of identification of each student.	<u>Individual Correction</u> No individual correction is required because the district was reviewed near the end of the school year. New WEPs will be written next fall for those students who will receive service. <u>Systemic Correction</u> ODE will ask for a sample of WEPs next November to show evidence that new WEPs meet the requirements.	<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)	The district attests that each gifted service offered in the district is not available to all eligible students in each building in the district at that grade level. Evidence also showed that gifted classes contain some students who are not identified.	<u>Individual Correction</u> No individual correction is required. <u>Systemic Correction</u> The district must develop a service plan that assures that each service is available to all students who meet the eligibility requirements and only to those students who meet the eligibility requirements.	<input checked="" type="checkbox"/> Yes

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	The district provided evidence that they have implemented their acceleration policy.	<u>Individual Correction</u> None <u>Systemic Correction</u> None	<input checked="" type="checkbox"/> NA

Component 5: Gifted Intervention Specialists and Attestation

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

Citation	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
		Required Actions	
OAC 3301-51-15(E)(2)	As per the attestation, 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 GIS 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 and schedules confirmed 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 does not report any students served in the regular classroom so there is no requirement for professional development.	<u>Individual Correction</u> None <u>Systemic Correction</u> None	<input checked="" type="checkbox"/> NA