

Portsmouth City School District IRN 044669

**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 December 5-8, 2011, 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 December 5-8, 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 November 22, 2011, Portsmouth City Schools mailed 560 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 on its website.

On December 6, 2011, OEC consultants held a public meeting for parents and other interested parties. Public parent meeting dates for all districts selected for IDEA Reviews are posted on the ODE website. Eight parents and one State Support Team (SST) Region 15 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. OEC did not receive any written comments. OEC did not receive any requests for individual parent/guardian meetings.

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

2. Pre-Onsite Data Analysis

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

3. Record Review

On December 5-8, 2011, OEC consultants reviewed 41 records of school age students with disabilities. An OEL&SR consultant, on December 8, 2011, reviewed eight 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 December 7-8, 2011, OEC consultants held four sessions of interviews with eight administrators and 26 teachers, school counselors, related services personnel and school psychologists. OEC interviews focused on the following review areas: Child Find; Delivery of Services; Least Restrictive Environment (LRE) and IEP alignment.

Findings

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

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

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

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

Corrective Action Plan (CAP)

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

CAP Due Date: 05-09-2012

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: 09-22-2012

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: 03-25-2013

For questions about specific components of this report please contact:

- **Special Education School Age:** Linn Davey, OEC Lead Consultant, at (614) 728-4180, toll-free at (877) 644-6338, or by e-mail at linn.davey@education.ohio.gov.
- **Special Education Early Childhood:** Barbara Weinberg, Educational Consultant, at (614) 387-2239, toll-free at (877) 644-6338, or by e-mail at Connie.Prairie@education.ohio.gov.
- **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:** Beth Hahn, Educational Consultant, at (614) 7521745, toll-free at (877) 644-6338, or by e-mail at Beth.Hahn@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>Six school age and one preschool reevaluation records indicated that the child's reevaluation was not completed within the three year timeline.</p> <p><u>Interviews</u></p> <p>During the interviews, staff and administrators explained their process for tracking timelines. We discussed that their process needs to be re-evaluated because timelines are not being met.</p>	<p><u>Individual Correction</u></p> <p>OEC has verified that these student(s) have a current ETR in place, so no additional individual correction is required.</p> <p><u>Systemic Correction</u></p> <p>The district must submit evidence to OEC of written procedures and practices in place regarding child find evaluation process.</p> <p>OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.</p>	<p><input checked="" type="checkbox"/> No</p> <p>The district does <u>not</u> need to address this finding in a Corrective Action Plan.</p>
CF-2	300.305(a)	<p><u>Record Review</u></p> <p>All applicable 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>	<p><input checked="" type="checkbox"/> NA</p>

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
CF-3	OAC 3301-51-06 (2) and OAC 3301-51-06(4)	<p><u>Record Review</u></p> <p>One school age initial evaluation did not appropriately document interventions provided to resolve concerns for the child performing below grade-level standards.</p>	<p><u>Individual Correction</u></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>	<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-4	300.501(b)(1)	<p><u>Record Review</u></p> <p>All school age student records showed evidence that the evaluation planning team included the parent.</p> <p>One preschool student record did not show evidence that the evaluation planning team included the parent.</p> <p><u>Interviews</u></p> <p>During the interviews staff discussed a variety of interventions that are being provided, including formal and informal conferences with parents of students with disabilities.</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>

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction		Must be addressed in CAP
			Required Actions		
CF-5	300.305(a)(1)	<u>Record Review</u> All school age and preschool student evaluations provided evidence that the evaluation planning team reviewed existing data on the child.	<u>Individual Correction</u> None	<u>Systemic Correction</u> None	<input checked="" type="checkbox"/> NA
CF-6	300.305(a)(2)	<u>Record Review</u> All school age and preschool student evaluations provided evidence that the evaluation planning team identified what additional data, if any, were needed.	<u>Individual Correction</u> None	<u>Systemic Correction</u> None	<input checked="" type="checkbox"/> NA
CF-7	300.304(c)(4); OAC 3301-51-01; and OAC 3301-51-06	<u>Record Review</u> Four school age student evaluations did not provide evidence that the evaluation addresses all areas related to the suspected disability. All preschool student evaluations provided evidence that the evaluation addresses all areas related to the suspected disability.	<u>Individual Correction</u> The district will convene the ETR team to conduct a reevaluation and provide evidence that the evaluation addresses all areas related to the suspected disability.	<u>Systemic Correction</u> The district must submit evidence to OEC of written procedures and practices in place to provide evidence that the evaluation addresses all areas related to the suspected disability. OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.	<input checked="" type="checkbox"/> No The district does <u>not</u> need to address this finding in a Corrective Action Plan.
CF-8	300.306(a)(1)	<u>Record Review</u> All school age and preschool student 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

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>One school age student initial evaluations 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 student initial evaluations showed evidence that a group of qualified professionals as appropriate to the suspected disability were involved in determining whether the child is a child with a disability.</p>	<p><u>Individual Correction</u></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.

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
CF-10	300.306(a)(1); 300.305(a); and 3301-51-01 (B)(21)	<p><u>Record Review</u></p> <p>Eight 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.</p> <p>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.</p> <p><u>Interviews</u></p> <p>During the interview process, staff and administrators discussed the need to create a checklist or a formal process to address district wide approach to determine a consistent method for reevaluations and process for conducting record reviews.</p>	<p><u>Individual Correction</u></p> <p>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.</p> <p>IEP Team Members include, but are not limited to:</p> <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. <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>	<p><input checked="" type="checkbox"/> Yes</p> <p>A Corrective Action Plan is required due to meeting the 30% threshold of non-compliance.</p>

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>Ten school age student and two preschool student IEPs did not address how the child's disability affects his/her involvement and progress in the general education curriculum.</p>	<p><u>Individual Correction</u></p> <p>The district must reconvene the IEP teams of the 12 IEPs identified as noncompliant to review and amend the IEP to include a statement of how the child's disability affects the child's participation in appropriate activities to access, participate and progress in the general education curriculum.</p> <p><u>Systemic Correction</u></p> <p>The district must submit evidence to OEC of written procedures and practices in place regarding the involvement and progress of children with disabilities in the general education curriculum and assessing how their disability affects that involvement.</p> <p>OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.</p>	<p><input checked="" type="checkbox"/> No</p> <p>The district does <u>not</u> need to address this finding in a Corrective Action Plan.</p>

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
DS-2	300.320(a)(1)	<p><u>Record Review</u></p> <p>Thirteen school age student IEPs did not contain Present Levels of Academic Achievement and Functional Performance (PLOP) that addressed the needs of the student.</p> <p>All preschool student IEPs contained PLOP that addressed the needs of the student.</p> <p><u>Interviews</u></p> <p>During the interviews staff and administrators discussed a variety of resources, universal screening and programs that are utilized, however staff are unclear how to document the data collected in the IEP.</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>

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
DS-3	300.320 (a)(2)(i)(A)	<p><u>Record Review</u></p> <p>Two school age student IEPs did not contain annual goals that address the child's academic area(s) of need.</p> <p>All preschool student IEPs contained annual goals that address the child's academic area(s) of need.</p>	<p><u>Individual Correction</u></p> <p>The district must reconvene the IEP teams of the two 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>Eight school age student and one preschool student IEPs did not contain annual goals that address the child's functional area(s) of need.</p> <p><u>Interviews</u></p> <p>During the interviews we discussed the ways that this district groups students into ability level groups. We discussed concerns with this style of classroom design as it does not allow students access to diverse student behaviors and functions.</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 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>	<input checked="" type="checkbox"/> Yes A Corrective Action Plan is required due to meeting the 30% threshold of non-compliance.

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
DS-5	300.320(a)(2)(i)	<p><u>Record Review</u></p> <p>Twelve school age and seven preschool student IEPs did not contain measurable annual goals.</p> <p><u>Interviews</u></p> <p>We discussed in the interviews that very little was documented in the PLOP that would provide a foundation for writing compliant IEP goals. We also discussed ways to incorporate the types of universal screening tools that this district uses.</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>Fourteen school age and eight preschool student IEPs 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>Through the interview process, it became clear that this district will need to prioritize training around specially designed instruction as this actually describes what students with disabilities are received that is above what all students receive.</p>	<p><u>Individual Correction</u></p> <p>The district must reconvene the IEP teams of the 22 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>	<input checked="" type="checkbox"/> Yes A Corrective Action Plan is required due to meeting the 30% threshold of non-compliance.
DS-7	300.320(a)(7)	<p><u>Record Review</u></p> <p>Thirteen school age and one preschool student IEPs did not indicate the location where the specially designed instruction will be provided.</p>	<p><u>Individual Correction</u></p> <p>The district must reconvene the IEP teams of the 14 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>	<input checked="" type="checkbox"/> Yes A Corrective Action Plan is required due to meeting the 30% threshold of non-compliance.

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
DS-8	300.320(a)(7)	<p><u>Record Review</u></p> <p>Thirteen school age and one preschool student 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 14 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"/> Yes</p> <p>A Corrective Action Plan is required due to meeting the 30% threshold of non-compliance.</p>
DS-9	300.320(a)(4)	<p><u>Record Review</u></p> <p>Two school age student IEPs did not identify related services that address the needs of the child and support the annual goals.</p> <p>All preschool student 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 two 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"/> No</p> <p>The district does <u>not</u> need to address this finding in a Corrective Action Plan.</p>

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
DS-10	300.320(a)(7)	<p><u>Record Review</u></p> <p>Two school age student IEPs did not indicate the location where the related services will be provided.</p> <p>All preschool student 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 two 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>Nine school student IEPs did not indicate the amount of time and frequency of the related services to be provided.</p> <p>All preschool student 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 Nine 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"/> Yes</p> <p>A Corrective Action Plan is required due to meeting the 30% threshold of non-compliance.</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>All school age and preschool student IEPs identified 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>None</p> <p><u>Systemic Correction</u></p> <p>None</p>	<input checked="" type="checkbox"/> NA
LRE-2	300.320(a)(6)(i)	<p><u>Record Review</u></p> <p>Five school age student IEPs did not identify accommodations provided to enable the child to be involved in and make progress in the general education curriculum</p> <p>All 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>Interviews</u></p> <p>During the interviews it became clear that staff is confusing accommodations as specially designed instruction.</p>	<p><u>Individual Correction</u></p> <p>The district must reconvene the IEP teams of the five IEPs identified as noncompliant to review the accommodations that would directly assist the child to access the course content without altering the amount or complexity of the information taught and include them on the IEP.</p> <p><u>Systemic Correction</u></p> <p>The district must submit evidence to OEC of written procedures and practices in place regarding accommodations.</p> <p>OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.</p>	<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-3	300.320(a)(4)	<p><u>Record Review</u></p> <p>Five school age student and one preschool student IEPs did not identify modifications to enable the child to be involved in and make progress in the general education curriculum.</p> <p><u>Interviews</u></p> <p>During the interviews it became clear that staff is confusing modifications as specially designed instruction. The staff also had a hard time describing what a modification is or the degree of modification that they are providing.</p>	<p><u>Individual Correction</u></p> <p>The district must reconvene the IEP teams of the six IEPs identified as noncompliant to review the modifications that would alter the amount or complexity of materials or the performance expected of the child from grade level curriculum expectations and include them on the IEP.</p> <p><u>Systemic Correction</u></p> <p>The district must submit evidence to OEC of written procedures and practices in place regarding modifications. OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.</p>	<input checked="" type="checkbox"/> Yes A Corrective Action Plan is required due to meeting the 30% threshold of non-compliance.
LRE-4	300.320(a)(4)	<p><u>Record Review</u></p> <p>One school age student and three preschool student IEPs did not identify supports for school personnel to enable the child to be involved in and make progress in the general education curriculum.</p>	<p><u>Individual Correction</u></p> <p>The district must reconvene the IEP teams of the four IEPs identified as noncompliant to review the supports for school personnel that were identified by the IEP team and define on the IEP the support, who will provide it and when the support will take place.</p> <p><u>Systemic Correction</u></p> <p>The district must submit evidence to OEC of written procedures and practices in place regarding supports for school personnel. OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.</p>	<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	
LRE-5	300.320(a)(5)	<p><u>Record Review</u></p> <p>Fourteen school age and one preschool student 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>Individual Correction</u></p> <p>The district must reconvene the IEP teams of the 15 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 did not indicated that the IEP Team included a parent. Revised on 04-04-2012 Removed language "did not".	<u>Individual Correction</u> None <u>Systemic Correction</u> None	<input checked="" type="checkbox"/> NA
LRE-7	300.321(2)	<u>Record Review</u> Seven school age and one preschool student IEPs did not indicate that the IEP Team included a regular education teacher.	<u>Individual Correction</u> For the eight IEPs 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 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. <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.	<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-8	300.321(3)	<p><u>Record Review</u></p> <p>All school age student IEPs indicated that the IEP Team included a special education teacher.</p> <p>One preschool student IEP did not indicate that the IEP Team included a special education teacher.</p>	<p><u>Individual Correction</u></p> <p>For the one IEP identified as noncompliant, the district must:</p> <ul style="list-style-type: none"> • Provide documentation that the parent was informed prior to the IEP meeting that the special education teacher would not participate in the meeting, and • Provide a written excuse signed by the parents and the district that allowed the special education teacher not to be in attendance at the IEP meeting, or • Reconvene the IEP team to review the IEP will all required members present. <p><u>Systemic Correction</u></p> <p>The district must submit evidence to OEC of written procedures and practices in place regarding special education teacher involvement in the IEP process.</p> <p>OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.</p>	<p><input checked="" type="checkbox"/> No</p> <p>The district does <u>not</u> need to address this finding in a Corrective Action Plan.</p>

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction		Must be addressed in CAP
			Required Actions		
LRE-9	300.321(4)	<u>Record Review</u> All school age and preschool student 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 student 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 student IEPs indicated that the child had an IEP in effect as reported on the LEA's December 1, 2010 Child Count Report. One preschool student IEPs indicated that the child did not have an IEP in effect as reported on the LEA's December 1, 2010 Child Count Report.	<u>Individual Correction</u> None	<u>Systemic Correction</u> The district must submit evidence to OEC of written procedures and practices in place regarding data reporting. OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.	<input checked="" type="checkbox"/> No The district does <u>not</u> need to address this finding in a Corrective Action Plan.

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
DV-2	300.645 R.C. 3301.07.14	<p><u>Record Review</u></p> <p>All school age student ETRs indicated that the child had an ETR in effect as reported on the LEA's December 1, 2010 Child Count Report.</p> <p>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></p> <p>None</p> <p><u>Systemic Correction</u></p> <p>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>	<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>
DV-3	SPP Indicator 20: Accurate and Timely Reporting of Special Education Event Record	<p><u>Record Review</u></p> <p>Two school age student 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> <ul style="list-style-type: none"> 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 <p>All preschool student records had accurate student data reported by the LEA through the Education Management Information System (EMIS) for the December 1, 2010 Child County Report.</p>	<p><u>Individual Correction</u></p> <p>The district must provide evidence that they corrected the student data through their Student Information System (SIS).</p> <p><u>Systemic Correction</u></p> <p>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>	<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	
DV-4	SPP Indicator 11 300.301(c)(1)(i)	<u>Record Review</u> All school age and preschool student 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 did not show evidence that an IEP was in place for 3 year olds transitioning from Early Intervention Programs (0-3 years) on or before the child's third birthday. Revised on 4-16-2012 (Removed language "did not").	<u>Individual Correction</u> None <u>Systemic Correction</u> None	<input checked="" type="checkbox"/> NA
DV-6 A/B	SPP Indicator 20 for Secondary Transition Plans	<u>Record Review</u> Four 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): 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> Four current IEP(s) 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 plan for the three four records identified as still noncompliant or provide documentation of the student's withdrawal date. Revised on 4-16-2012 (Changed language from three to four). <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>Portsmouth City Schools treasurer provided the FY11 and FY12 FINDETs. The amounts documented in the FY11 reports are in agreement with the amounts submitted in the FERs.</p> <p>The amounts reported in the FY12 FINDET to date were in alignment with the FY12 budget. The district had utilized approximately 25% of its funds to date.</p> <p>The FY11 ARRA and FY12 Early Childhood allocations (fund 587) were reviewed. The balance of the FY11 funds was expended, while the FY12 funds have been appropriately budgeted for the year.</p>	<p><u>Individual Correction</u></p> <p>None</p> <p><u>Systemic Correction</u></p> <p>None</p>	N/A	<input checked="" type="checkbox"/> NA

Component 2: Payroll Expenditures

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

Findings Citation	Evidence	Evidence of Correction		Must be addressed in CAP
		Required Actions	Date Due	
300.202	<p>The FY12 Fund 516 FINDET listed 7 staff being funded through IDEA funds as intervention specialists, supervisor, paraprofessionals and clerk. Expenditures were appropriate and in alignment with the budget. Staff held appropriate licensure. Semi-Annual certifications were not yet completed for two staff.</p> <p>The FY11 FINDET showed that 6 staff persons were funded through IDEA ARRA funds, as well as two staff on supplemental contract. The staff were contracted as intervention specialists and paraprofessionals. Position descriptions for each position were presented, Semi-Annual Certifications were complete and appropriate, while the supplemental contracted staff showed documentation of time and effort. Expenditures were appropriate and in agreement with the FER. Staff held appropriate licensure.</p> <p>The FY12 FINDET showed that one staff was funded through IDEA Fund 587 funds as an educational aide. Licensure and Semi-Annual Certifications were complete and appropriate. No staff were funded through FY11 IDEA ARRA funds.</p> <p>Coding was appropriate for 9 staff. 5 Intervention Specialists were coded with Function Code 1239 (Other Handicap) rather than the code most appropriate to their instructional assignment. Two staff – the supervisor and the special education clerk, were coded with Function 2211 (Service Area Direction) rather than 2416 and 2417 respectively. The district cited that these were legacy codings from the previous treasurer.</p>	<p><u>Individual Correction</u></p> <p>The district should review the function codes that describe the position/services provided by the intervention specialists, the supervisor and the support staff and correct the coding in the financial system to reflect those proper function codes.</p> <p><u>Systemic Correction</u></p> <p>The district must submit a plan describing the steps it will follow to assure that the financial coding used in designating staff paid through IDEA funds will accurately describe the work they are assigned.</p>	<p>Individual Correction for Fiscal Requires the following due date:</p> <p>60 days from receipt of this report.</p>	<p><input checked="" type="checkbox"/> Yes</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>The district was provided a list of 20 vouchers that were to be reviewed from FY11 and FY12 Fund 516 and 587, SSCs 9320 and 9012. The district provided appropriate documentation, including the voucher, invoice, purchase order or receipt for each item. The expenditures were for an appropriate purpose and were reasonable for the program.</p> <p>Several coding issues were identified.</p> <ol style="list-style-type: none"> 1. If the services in the contract with Haugland Learning Center – voucher #136016, are for the services of one aide for one student, then the function code would be 2216, and not 2214. The treasure and special education supervisor must review this situation for clarification, then review the FY12 expenditure for accuracy. 2. The district did not have a memorandum of understanding (MOU) in place for the students served in the Scioto County DD. 3. The function code for all items reviewed in FY12 Fund 516 funds were identified with the function codes of 2110 or 2211. For four of the items, voucher 138210, voucher 138297, voucher 138485 and voucher 138345, incorrect function codes were used. Also in voucher 138345, the incorrect object code was used. <p>The district was provided a list of the items to review and correct including the recommended function and object codes.</p> <p>Items purchased with FY11 and FY21 Fund 587 were all coded correctly.</p>	<p><u>Individual Correction</u></p> <p>Items #1 and #2 were found in FY11 ARRA fund vouchers, but not in FY12 IDEA expenditures. It would not be prudent to return to last year's reports to correct those items. However, item #3 is found in FY12 fund 516 expenditures, and each of the items must be corrected in the district financial system to reflect the appropriate function and object codes. The district also must produce evidence of the corrections and submit</p> <p><u>Systemic Correction</u></p> <p>The district must submit a plan describing the steps it will follow to assure that the financial coding used in approving expenditures of IDEA funds will designate the proper function and object codes reflective of the expenditure.</p>	<p>Individual Correction for Fiscal Requires the following due date:</p> <p>60 days from receipt of this report.</p>	<p><input checked="" type="checkbox"/> Yes</p>

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

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

Findings Citation	Evidence	Evidence of Correction		Must be addressed in CAP
		Required Actions	Date Due	
300.202	The district expended \$ 4,612.23 in FY11 IDEA ARRA 516 funds for capital outlay/instruction and has budgeted \$500.00 in FY12. The district also expended \$148.90 in its FY11 587 ARRA funds. The district followed the Board-adopted procurement policy. The district maintains a record of and authority over items made available to the non-public school, but the inventory list reflected no items in the non-public school. The materials are used for the purposes of meeting the needs of the identified special education students.	<u>Individual Correction</u> None <u>Systemic Correction</u> None	N/A	<input checked="" type="checkbox"/> No

Component 5: Equipment inventory policy and procedures

The district/school retains control and administration of funds used to purchase materials, equipment and property purchased with those funds for the uses and purpose provided in the IDEA. The district is properly identifying equipment purchased with IDEA funds and is complying with Board Policy in cataloguing and inventorying the equipment. The district master list of equipment purchased with IDEA funds was updated within the last two years; the district has 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	Portsmouth City Schools presented copies of its Purchasing Policy, Disposition of Real and Surplus Policies, and its accounting system for Fixed Assets. The district also provided a copy of its Inventory List which had one item listed, purchased with IDEA funds in FY11. The list contained all the required items of documentation. The one item was for inventory review. It was found to be satisfactory.	<u>Individual Correction</u> Portsmouth City Schools is reminded to follow its inventory policy to identify all items purchased in FY12 , specifically the 12 computers and monitors and the stackable cots and be sure to include those items on its inventory review to be done in June. <u>Systemic Correction</u> None	N/A	<input checked="" type="checkbox"/> No

Component 6: Non-Public Count and Proportionate Share

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

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

Findings Citation	Evidence	Evidence of Correction		Must be addressed in CAP
		Required Actions	Date Due	
300.130 through 300.144	<p>Portsmouth City Schools staff provided copies of detailed information pertaining to the child find process with the non-public school and community. Staff provided copies of records and meeting notes and other information to document its timely and meaningful consultation with the non-public schools.</p> <p>Staff 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. All information was acceptable.</p> <p>Funds are used in non-public schools to meet the needs of the identified special education students.</p>	<p><u>Individual Correction</u></p> <p>None</p> <p><u>Systemic Correction</u></p> <p>None</p>	N/A	<input checked="" type="checkbox"/> NA

Component 7: Notification of Public Participation

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

Findings Citation	Evidence	Evidence of Correction		Must be addressed in CAP
		Required Actions	Date Due	
300.165 and Part 300.201	<p>Portsmouth City Schools did not provide the opportunity for public participation in the planning of the use of IDEA funds.</p> <p>The district did provide informational discussions announced to parents during open-house events, however such events were titled "Title I" informational discussions. The district did not provide a public forum open to the general public to enable public input and comment in the planning for the use of IDEA funds.</p>	<p><u>Individual Correction</u></p> <p>The district did not provide the opportunity for public participation in the planning in FY12, and that item is not able to be corrected.</p> <p><u>Systemic Correction</u></p> <p>Portsmouth City Schools must develop a plan describing the steps it will follow to provide an opportunity for public participation in the planning for the use of IDEA Part B funds. It must provide documentation of the event being held, such as a public announcement, sign in sheet, presentation materials, etc. of the forum/hearing held for the IDEA funds for the FY13 fund year.</p>	Response to be included as part of the Corrective Action Plan and be submitted in accordance with that due date.	<input checked="" type="checkbox"/> Yes

Component 8: Redirection of funds

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

If the district/school reduced its local expenditure, it was by no more than 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.	<p><u>Individual Correction</u></p> <p>None</p> <p><u>Systemic Correction</u></p> <p>None</p>	N/A.	<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 December 8, 2011 by Beth Hahn.

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)	<p>OEC reviewed district spending related to gifted education. Evidence was provided to demonstrate that fiscal year 2011 gifted spending for services was equal to or more than fiscal year 2009 unit funding.</p> <p>Records reviewed for expenditures for gifted identification in 2011 indicate that if the low spending pattern is continued in 2012 the district may have maintenance of effort issues in that area. Gifted identification expenditures in 2012 must match or exceed funds allocated in that category in 2009.</p>	<p><u>Individual Correction</u> None</p> <p><u>Systemic Correction</u> None</p>	<input checked="" type="checkbox"/> No

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. All attributes were present on all WEPs.	<u>Individual Correction</u> None <u>Systemic Correction</u> None	<input checked="" type="checkbox"/> No

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 attested and provided evidence that each gifted service offered in the district is available to all eligible students in each building in the district at that grade level.	<u>Individual Correction</u> None <u>Systemic Correction</u> None	<input checked="" type="checkbox"/> No

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	No WAPs were provided for early entrance to kindergarten, whole grade acceleration, subject acceleration or early graduation. The gifted coordinator began efforts to make information available to parents and staff on the day of the review.	<u>Individual Correction</u> None <u>Systemic Correction</u> The district is required to submit evidence to demonstrate that parents and staff are aware of the acceleration policy and are able to submit referrals.	<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"/> No

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 staff 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"/> No

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 provided evidence that this requirement has been met.	<u>Individual Correction</u> None <u>Systemic Correction</u> None	<input checked="" type="checkbox"/> No

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 as being served by general education teachers so no professional development is required.	<u>Individual Correction</u> None <u>Systemic Correction</u> None	<input checked="" type="checkbox"/> No