

Sycamore Community City School District IRN 044867

**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 January 23-26, 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 January 23-26, 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 January 9, 2012, Sycamore Community City Schools mailed 564 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 December 24, 2011 in the *Cincinnati Enquirer*, the elementary newsletter and the district website.

On January 24, 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. Nineteen parents and two State Support Team (SST) Region 13 representatives attended the public meeting. Attendees could speak to OEC representatives publicly in the meeting or individually, provide written comments, or both. Eight parents made comments during the public meeting. Written comment forms were available before, during and after the meeting. OEC received five written comments.

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

2. Pre-Onsite Data Analysis

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

3. Record Review

On January 23-25, 2012, OEC consultants reviewed 41 records of school age students with disabilities. An OEL&SR consultant, on January 25, 2012, reviewed eight records as part of the Early Childhood Special Education Review. OEC selected records of a variety of children with disabilities from seven buildings.

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

4. Staff/Administrative Interviews

On January 26, 2012, OEC consultants held one session of interviews with ten administrators and three separate interviews to include 21 teachers, three related services personnel and three 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 Sycamore Community 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 Susan Rieger, OEC Lead Consultant at susan.rieger@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: 06-01-2012

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: 10-01-2012

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: 04-18-2013

For questions about specific components of this report please contact:

- **Special Education School Age:** Susan Rieger, OEC Lead Consultant, at (614) 995-9935, toll-free at (877) 644-6338, or by e-mail at susan.rieger@education.ohio.gov.
- **Special Education Early Childhood:** Connie Prairie Educational Consultant, at (614) 995-9934, 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:** Elizabeth Hahn, Educational Consultant, at (614) 752-1745, toll-free at (877) 644-6338, or by e-mail at Elizabeth.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>One school age reevaluation record indicated that the child's reevaluation was not completed within the three year timeline.</p> <p>All applicable preschool reevaluation records indicated that the child's reevaluation was completed within the three year timeline.</p>	<p><u>Individual Correction</u></p> <p>OEC has verified that this student has 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 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)	<u>Record Review</u> All school age and preschool initial evaluations appropriately documented interventions provided to resolve concerns for the child performing below grade-level standards.	<u>Individual Correction</u> None <u>Systemic Correction</u> None	<input checked="" type="checkbox"/> NA
CF-4	300.501(b)(1)	<u>Record Review</u> Eight school age students did not show evidence that the evaluation planning team included the parent. All preschool student records showed evidence that the evaluation planning team included the parent.	<u>Individual Correction</u> The district must provide evidence that the parent was involved or provided the opportunity to participate (three documented attempts) in the evaluation planning process. The evidence may include; evaluation planning form, prior written notice, parent invitation, referral form or communication log. <u>Systemic Correction</u> The district must submit evidence to OEC of written procedures and practices in place regarding the evaluation planning process to include the parent. OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.	<input checked="" type="checkbox"/> No The district does <u>not</u> need to address this finding in a Corrective Action Plan.

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
CF-5	300.305(a)(1)	<p><u>Record Review</u></p> <p>One school age and one preschool student evaluations did not provide evidence that the evaluation planning team reviewed existing data on the child.</p>	<p><u>Individual Correction</u></p> <p>The district must provide the evaluation planning form or evidence documenting existing data was reviewed during the evaluation planning process. If not, the IEP team must reconvene the ETR planning and ETR meeting.</p> <p><u>Systemic Correction</u></p> <p>The district must submit evidence to OEC of written procedures and practices in place to review existing data during the evaluation planning.</p> <p>OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.</p>	<p><input checked="" type="checkbox"/> No</p> <p>The district does <u>not</u> need to address this finding in a Corrective Action Plan.</p>
CF-6	300.305(a)(2)	<p><u>Record Review</u></p> <p>Four school age and one preschool student records did not provide evidence that the evaluation planning team identified what additional data, if any, were needed.</p>	<p><u>Individual Correction</u></p> <p>The district must provide the evaluation planning form or evidence documenting additional data, if any was reviewed during the evaluation planning process. If not, the IEP team must reconvene the ETR planning and ETR meeting.</p> <p><u>Systemic Correction</u></p> <p>The district must submit evidence to OEC of written procedures and practices in place to review additional data, if any during evaluation planning.</p> <p>OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.</p>	<p><input checked="" type="checkbox"/> No</p> <p>The district does <u>not</u> need to address this finding in a Corrective Action Plan.</p>

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
CF-7	300.304(c)(4); OAC 3301-51-01; and OAC 3301-51-06	<p><u>Record Review</u></p> <p>All school age student evaluations provided evidence that the evaluation addressed all areas related to the suspected disability.</p> <p>One preschool student evaluation did not provide evidence that the evaluation addressed 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>	<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)	<p><u>Record Review</u></p> <p>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.</p> <p><u>Interviews</u></p> <p>At the public meeting, parents felt that their opinions were valued.</p> <p><u>Other Considerations</u></p> <p>Parents had very positive comments about the district and staff. Some indicated they had moved into the district specifically for its reputation in supporting students with disabilities.</p>	<p><u>Individual Correction</u></p> <p>None</p> <p><u>Systemic Correction</u></p> <p>None</p>	<input checked="" type="checkbox"/> NA

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
CF-9	300.306(a)(1)	<p><u>Record Review</u></p> <p>All school age and 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>None</p> <p><u>Systemic Correction</u></p> <p>None</p>	<input checked="" type="checkbox"/> NA
CF-10	300.306(a)(1); 300.305(a); and 3301-51-01 (B)(21)	<p><u>Record Review</u></p> <p>Fifteen 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 applicable 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>Other Considerations</u></p> <p>The district has a tiered system of determining who will be the district representative at ETR meetings.</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>	<input checked="" type="checkbox"/> Yes A Corrective Action Plan is required due to meeting the 30% threshold of non-compliance.

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>Four school age student IEPs did not address how the child’s disability affects his/her involvement and progress in the general education curriculum.</p> <p>All preschool student 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>Teachers stated that if the curriculum had to be modified so extensively that it was unrecognizable, there would be a concern as to whether the student would be best served in the resource room. However, they stated that they wanted their students in the general education classroom as much as possible.</p> <p><u>Other Considerations</u></p> <p>Parents expressed a concern about their students with disabilities transitioning from one level to another: Elementary to Intermediate to Junior High to High School. They felt there needed to be more consistency as the child progressed throughout the school system. Teachers stated they have future planning meetings and that the students are introduced to teachers, the classroom and peers during the transition period.</p>	<p><u>Individual Correction</u></p> <p>The district must reconvene the IEP teams of the four 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)	<u>Record Review</u> All school age and preschool student IEPs contained Present Levels of Academic Achievement and Functional Performance (PLOP) that addressed the needs of the student.	<u>Individual Correction</u> None <u>Systemic Correction</u> None	<input checked="" type="checkbox"/> NA
DS-3	300.320 (a)(2)(i)(A)	<u>Record Review</u> One school age student IEP did not contain annual goals that address the child's academic area(s) of need. All preschool student IEPs contained annual goals that address the child's academic area(s) of need.	<u>Individual Correction</u> The district must reconvene the IEP team of the one IEP 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. <u>Systemic Correction</u> The district must submit evidence to OEC of written procedures and practices in place regarding the IEP process of addressing identified academic needs. 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	
DS-4	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 functional area(s) of need.</p> <p>All preschool student IEPs contained annual goals that address the child's functional area(s) of need</p> <p><u>Interviews</u></p> <p>Parents stated that their students with disabilities needed more socializing skills than was offered.</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 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"/> No <p>The district does <u>not</u> need to address this finding in a Corrective Action Plan.</p>
DS-5	300.320(a)(2)(i)	<p><u>Record Review</u></p> <p>Fourteen school age student and six preschool student IEPs did not contain measurable annual goals.</p> <p><u>Interviews</u></p> <p>Teachers stated they had some training on measurable goals. Training was during release days and during their monthly special education meetings. They stated that they were beginning to better understand the requirements for writing measurable goals than previously.</p>	<p><u>Individual Correction</u></p> <p>The district must reconvene the IEP teams of the 20 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? 	<input checked="" type="checkbox"/> Yes <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	
			<u>Systemic Correction</u> The district must implement new procedures to ensure that annual goals written subsequent to this report will include the following six critical elements to demonstrate correction: <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? OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.	
DS-6	300.320(a)(4)	<u>Record Review</u> Ten school age and five preschool student IEPs did not contain a statement of specially designed instruction that addresses the needs of the child and supports annual goals. <u>Interviews</u> Teachers stated that they had some training on specially designed instruction and that it was ongoing. They stated that it was based upon the individual student. <u>Other Considerations</u> In their interview, teachers called specially designed instruction 'specific interventions.' A caution here since specially designed instruction is instruction not interventions. It is important that teachers understand the difference between the two.	<u>Individual Correction</u> The district must reconvene the IEP teams of the 15 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. <u>Systemic Correction</u> The district must submit evidence to OEC of written procedures and practices in place regarding the IEP process of determining specially designed instruction. OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.	<input checked="" type="checkbox"/> Yes A Corrective Action Plan is required due to meeting the 30% threshold of non-compliance.

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
DS-7	300.320(a)(7)	<p><u>Record Review</u></p> <p>Five school age student IEPs did not indicate the location where the specially designed instruction will be provided.</p> <p>All preschool student 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 five 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>
DS-8	300.320(a)(7)	<p><u>Record Review</u></p> <p>Five school age student IEPs did not indicate the amount of time and frequency of the specially designed instruction.</p> <p>All preschool student IEPs indicated the amount of time and frequency of the specially designed instruction.</p>	<p><u>Individual Correction</u></p> <p>The district must reconvene the IEP teams of the five 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>All school age and preschool student IEPs identified related services that address the needs of the child and support the annual goals.</p> <p><u>Other Considerations</u></p> <p>Parents stated a concern regarding the time and quality of the related services their children were receiving.</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	
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 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 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>	<input checked="" type="checkbox"/> No The district does <u>not</u> need to address this finding in a Corrective Action Plan.
DS-11	300.320(a)(7)	<p><u>Record Review</u></p> <p>One school age IEP 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 team of the one IEP 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>	<input checked="" type="checkbox"/> No The district does <u>not</u> need to address this finding in a Corrective Action Plan.

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 students 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>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>	<input checked="" type="checkbox"/> NA
LRE-3	300.320(a)(4)	<p><u>Record Review</u></p> <p>One school age student IEP did not identify modifications to enable the child to be involved in and make progress in the general education curriculum.</p> <p>It was not applicable to preschool student IEPs to identify modifications 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 the modifications that would alter the amount or complexity of materials or the performance expected of the child from grade level curriculum expectations and include them on the IEP.</p> <p><u>Systemic Correction</u></p> <p>The district must submit evidence to OEC of written procedures and practices in place regarding modifications.</p> <p>OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.</p>	<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-4	300.320(a)(4)	<p><u>Record Review</u></p> <p>All school age and preschool student IEPs identified 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>None</p> <p><u>Systemic Correction</u></p> <p>None</p>	<input checked="" type="checkbox"/> NA
LRE-5	300.320(a)(5)	<p><u>Record Review</u></p> <p>Nine school age student and two 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>Interviews</u></p> <p>Parents stated that the district needed to pay closer attention to inclusion. It was stated that there was an initiative to include students with disabilities as much as possible in activities, such as clubs and other activities. Parents stated that there should be more inclusion especially at the high school.</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 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>	<input checked="" type="checkbox"/> No <p>The district does <u>not</u> need to address this finding in a Corrective Action Plan.</p>

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
LRE-6	300.321(1)	<p><u>Record Review</u></p> <p>Two school age student IEPs did not indicate that the IEP Team included a parent.</p> <p>All preschool student IEPs indicated that the IEP Team included a parent.</p>	<p><u>Individual Correction</u></p> <p>For the two IEPs identified as noncompliant, the district must:</p> <ul style="list-style-type: none"> • Provide evidence of parent participation at the IEP meeting, or • Provide documentation of at least three attempts made by the district to ensure parent participation, or • Reconvene the IEP team to review the IEP with the parent. <p><u>Systemic Correction</u></p> <p>The district must submit evidence to OEC of written procedures and practices in place regarding parent involvement in the IEP process.</p> <p>OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.</p>	<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-7	300.321(2)	<p><u>Record Review</u></p> <p>Four school age and one preschool student IEPs did not indicate that the IEP Team included a regular education teacher.</p>	<p><u>Individual Correction</u></p> <p>For the five IEPs identified as noncompliant, the district must:</p> <ul style="list-style-type: none"> • Provide documentation that the parent was informed prior to the IEP meeting that the regular education teacher would not participate in the meeting, and • Provide a written excuse signed by the parents and the district that allowed the regular education teacher not to be in attendance at the IEP meeting, or • Reconvene the IEP team to review the IEP will all required members present. <p><u>Systemic Correction</u></p> <p>The district must submit evidence to OEC of written procedures and practices in place regarding regular education teacher involvement in the IEP process.</p>	<p><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	
			OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.	
LRE-8	300.321(3)	<p><u>Record Review</u></p> <p>One school age and one preschool student IEPs did not indicate that the IEP Team included a special education teacher.</p> <p><u>Other Considerations</u></p> <p>If the intervention specialist is also acting as the district representative, that person needs to sign as the district representative and the intervention specialist.</p>	<p><u>Individual Correction</u></p> <p>For the two IEPs 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>	<input checked="" type="checkbox"/> No The district does <u>not</u> need to address this finding in a Corrective Action Plan.

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
LRE-9	300.321(4)	<p><u>Record Review</u></p> <p>Six school age student IEPs did not indicate that the IEP Team included an LEA representative.</p> <p>All preschool student IEPs indicated that the IEP Team included an LEA representative.</p> <p><u>Interviews</u></p> <p>Intervention specialists indicated that they would act as the district representative if they felt the parents were already in agreement with the IEP.</p> <p><u>Other Considerations</u></p> <p>If the intervention specialist is also acting as the district representative, that person needs to sign as the district representative and the intervention specialist. A caution to the district in using their four tier system: the district representative must meet all the criteria as defined in the federal law.</p>	<p><u>Individual Correction</u></p> <p>For the six IEPs identified as noncompliant, the district must:</p> <ul style="list-style-type: none"> • Provide documentation that the parent was informed prior to the IEP meeting that the LEA representative would not participate in the meeting, and • Provide a written excuse signed by the parents and the district that allowed the LEA representative not to be in attendance at the IEP meeting, or • Reconvene the IEP team to review the IEP will all required members present. <p><u>Systemic Correction</u></p> <p>The district must submit evidence to OEC of written procedures and practices in place regarding LEA representative involvement in the IEP process.</p> <p>OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.</p>	<input checked="" type="checkbox"/> No The district does <u>not</u> need to address this finding in a Corrective Action Plan.
LRE-10	300.321(5)	<p><u>Record Review</u></p> <p>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.</p>	<p><u>Individual Correction</u></p> <p>None</p> <p><u>Systemic Correction</u></p> <p>None</p>	<input checked="" type="checkbox"/> NA

Component 4: Data Verification

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

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
DV-1	300.645 R.C. 3301.07.14	<u>Record Review</u> All school age and preschool student 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 did have an ETR in effect as reported on the LEA's December 1, 2010 Child Count Report.	<u>Individual Correction</u> None <u>Systemic Correction</u> None	<input checked="" type="checkbox"/> NA
DV-3	SPP Indicator 20: Accurate and Timely Reporting of Special Education Event Record	<u>Record Review</u> Two school age and no preschool student 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> This item was not reviewed because the district is currently in an Indicator 11 review process with the Office for Exceptional Children.	<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

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
DV-6 A/B	SPP Indicator 20 for Secondary Transition Plans	<p><u>Record Review</u></p> <p>Seven 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):</p> <ol style="list-style-type: none"> 1. There are appropriate measurable postsecondary goal(s). 2. The postsecondary goals are updated annually. 3. The postsecondary goals were based on age appropriate transition assessment. 4. There are transition services that will reasonably enable the student to meet the postsecondary goal(s). 5. The transition services include courses of study that will reasonably enable the student to meet the postsecondary goal(s). 6. The annual goal(s) are related to the student's transition service needs. 7. There is evidence the student was invited to the IEP Team Meeting where transition services were discussed. 8. When appropriate, there is evidence that a representative of any participating agency was invited to the IEP Team Meeting. <p><u>Interviews</u></p> <p>Teachers stated that they had some training on secondary transition plans but that the writing of the plans had changed since then. More recently they had received some assistance from the State Support Team 13.</p>	<p><u>Individual Correction</u></p> <p>OEC has verified that six student(s) have a current IEP(s) that contains transition plans that meet all 8 required elements of IDEA, so no additional individual correction is required.</p> <p>One current IEP did not contain transition plans that meet all 8 required elements of IDEA.</p> <p>The district must reconvene the IEP teams to review and correct the secondary transition plan for the seven records identified as still noncompliant or provide documentation of the student's withdrawal date.</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"/> Yes</p> <p>A Corrective Action Plan is required due to meeting the 30% threshold of non-compliance.</p>

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>Sycamore Community City Schools treasurer provided the (Fund 516) FY11 IDEA ARRA and the FY12 IDEA FINDETs. The amounts documented in the FY11 reports were in alignment with the FY11 budget and are in agreement with the amount FY11 IDEA ARRA FER in the CCIP.</p> <p>The amounts reported in the FY12 FINDET to date were consistent with the FY12 IDEA budget and were in alignment with appropriate spending.</p> <p>The (Fund 587) FY11 ECSE ARRA and FY12 ECSE regular allocations were reviewed. The amounts documented in the reports were in alignment with the FY 11 & 12 budgets and in agreement with the FY11 ECSE ARRA FER and showed appropriate FY12 spending.</p>	<p><u>Individual Correction</u> None</p> <p><u>Systemic Correction</u> 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 29 staff receiving some level of funding through IDEA funds. Staff included educational aides, Speech and Language Pathologists, Psychologists and Nursing Services. Expenditures were appropriate and in alignment with the budget. Staff held appropriate licensure. Semi-Annual certifications or time and effort logs were present.</p> <p>The FY11 ARRA FINDET showed that 11 staff persons were funded through IDEA ARRA funds. Primarily funded were three Occupational Therapists, with minimal uses of funds for the remaining 8 staff – generally supplemental fees. Position descriptions were presented, with Time and Effort logs being the primary source of the outlay of funds. 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 a Speech Therapist. Licensure and Semi-Annual Certifications were complete and appropriate. One staff person was partially funded through FY11 ECSE ARRA funds – School Nurse. Expenditures were appropriate and in agreement with the FER. Staff held appropriate licensure.</p> <p>Coding was determined to be appropriate for all staff. Sycamore Community City Schools was in compliance in their use of IDEA funds in this section of the review.</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 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 46 vouchers to be reviewed from FY11 & 12, Fund 516 and 587, 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 be satisfactory for the program and to serve the appropriate public purpose, with the exception of one – voucher 231575. The voucher indicated that the expenditure was to serve 80 classrooms, and the expense was questioned.</p> <p>Several coding issues were identified.</p> <ol style="list-style-type: none"> 1. Of the 46 vouchers reviewed, 9 showed the function code of 1270 – Disadvantaged Youth, however the expenditures were for the special education costs. No fewer than 230 miscodings using function code 1270 were identified in the FY11 ARRA FINDET. An additional 117 miscodings were found in the FY12 IDEA FINDET. 2. Other function code errors were identified wherein function codes ending in 9 – Other – were used at a very high rate (14 cases in the reviewed vouchers) instead of specifying the function code appropriate for the function category. <p>Items purchased with FY11 and FY21 Fund 587 were all coded correctly.</p>	<p><u>Individual Correction</u></p> <p>Sycamore Community City Schools must review their FY12 IDEA expenditures to determine the appropriate function code that will reference the appropriate grade levels as well as the appropriate handicapping condition.</p> <p>All FY12 IDEA expenditures using the Function Code 1270 must be amended to show the use of the correct Function Code.</p> <p><u>Systemic Correction</u></p> <p>Sycamore Community City Schools must update its purchasing policy to assure that the proper function code referencing the purchase of instructional materials for special education is taken from either the 1230 or the 1240 function code series, and be specific to the handicapping category for the item use.</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	<p>Sycamore Community City Schools expended IDEA and ARRA funds for Capital Outlay/equipment. The district provided a copy of its purchasing Policy and appears to have followed the procedure in expending IDEA funds. Items were placed in the administration offices as well as the individual school buildings. A portion of the IDEA funds identified for use in the non-public schools was used for the purchase of furniture for the non-public schools special education services. The district maintains authority over those items.</p> <p>It is difficult to determine the extent to which the district purchasing procedures were followed, as evidenced in Component 3 above and Component 5 below. Determination of appropriate function codes is a part of the purchasing process, as is identification of items that will need to be included on the district inventory list prior to purchase. Because of inconsistencies, a final determination of compliance with policies is difficult.</p>	<p><u>Individual Correction</u> None</p> <p><u>Systemic Correction</u> It is recommended that as a part of the response to Components 3 and 5, the district reviews its purchasing process to assure confidence in that process.</p>	N/A	<input checked="" type="checkbox"/> NA

Component 5: Equipment inventory policy and procedures

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

Findings Citation	Evidence	Evidence of Correction		Must be addressed in CAP
		Required Actions	Date Due	
300.202	<p>Sycamore Community City Schools provided a copy of its Purchasing Policy, Inventory Policy and a copy of the Asset Listing detailing items purchased with IDEA funds that fell within the Inventory category of Controllable Assets.</p> <p>Items listed on the Controllable Assets list were accurately identified with an inventory tag number, description, acquisition date, item location and purchase amount. A discrepancy exists between the FY11/ FY12 FINDET and the List. Each item on the Controllable Assets list shows either the Function Code 1200 or 2100; however the FINDET does not show either of those Function Codes to have been used in either fund year. There needs to be consistent use of item identification information.</p> <p>Upon review of the FINDET, items were identified that should have been included a list of items purchased with IDEA funds, however the items were not listed document provided by the district. The district stated that the items were on the inventory list as described by the district Inventory Policy, but not on the Controllable Assets list provided for ODE review. In some cases, items purchased within a given time period were entered onto the list, while others were omitted.</p> <p>It could not be determined how the inventory policy was being implemented and followed based upon the FINDET data and the Inventory/ Controllable Assets listing.</p>	<p><u>Individual Correction</u></p> <p>Sycamore Community City Schools must review its current Inventory List of items purchased with IDEA funds to verify that the fund codes for items on the list reflect the fund codes shown on the FINDET.</p> <p>The district must also review its Inventory Policy to determine if purchased items fit within its own policy description and should be included on the inventory list.</p> <p><u>Systemic Correction</u></p> <p>Sycamore Community City Schools must review its inventory procedures to assure that items entered into inventory accurately reflect the proper fund codes that appear on the voucher, with consideration given to Component 3, which address the requirement to use proper Function Codes in purchasing.</p> <p>The district must also develop a process through which it consistently identifies items that must be included in the inventory list of items purchased with IDEA funds and provide a composite listing of such items to ODE.</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 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>Sycamore Community City Schools provided evidence that district administration provides child find and ensures equitable participation. The district provided a record of the Non-public students referred for testing. The record documented the number of children tested, the number who qualified for services and the number of those students being served.</p> <p>The district evidenced that it has timely and meaningful consultation with non-public school staff, and that there is discussion related to service to be provided and the items necessary to meet the needs of the identified students.</p>	<p><u>Individual Correction</u> None</p> <p><u>Systemic Correction</u> 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>Sycamore Community City Schools did not provide the opportunity for public participation in the planning of the use of IDEA funds.</p> <p>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 during the 2010-11 or 2011-12 program years.</p>	<p><u>Individual Correction</u></p> <p>The district did not provide the opportunity for public participation in the planning for IDEA funds in FY12, and that item is not able to be corrected.</p> <p><u>Systemic Correction</u></p> <p>Sycamore Community 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 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 planning of the use of the Part B funds for the FY13 fund year.</p>		<input checked="" type="checkbox"/> Yes

Component 8: Redirection of funds

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

If the district/school reduced its local expenditure, it was by no more than ½ of its additional allocation amount and the district can document the expenditures/reduction and the amount is shown in the CCIP.

Findings Citation	Evidence	Evidence of Correction		Must be addressed in CAP
		Required Actions	Date Due	
300.205	<p>Sycamore Community City Schools was notified in November, 2011, that it was determined to show disproportionality through its reported EMIS records. The district is required to redirect 15% of its FY12 Part B funds to provide for Comprehensive Early Intervening Services within the 2011-12 program year.</p> <p>The amount of the required redirection is \$173,152.14.</p> <p>The district was informed that it was permissible to review FY11 IDEA expenditures to determine if any of those costs would be applicable to the implementation of CEIS in the district. The district may also review its FY11 General Fund expenditures to determine if those expenditures would be in agreement with the requirement of the CEIS obligation, and if the costs are eligible expenditures, to recode those expenditures to be IDEA funded activities and include them against the balance of the 15% requirement.</p> <p>It is recommended that the district review its FY12 General Fund expenditures and its Part B expenditures to identify any obligations that would be applicable to the 15% redirection requirement to assure that the amount is submitted into the CCIP IDEA Redirection Page and expended by the end of the school year.</p> <p>The district should use Job Code 1920 – Student Intervention Services, to identify all costs to be accounted against the 15% redirection amount.</p> <p>The district is aware that it must complete the identification of funds and budgeting of the amount to be redirected and complete the implementation of the planned CEIS activities by June 30, 2012.</p>	<p><u>Individual Correction</u></p> <p>Sycamore Community City Schools must complete the submission of the CEIS 15% redirection requirement. Information supporting the use of IDEA or general funds from FY11 and 12 must be sent to Stephanie Ferrell at the Office for Exceptional Children for her review and approval.</p> <p>The district must submit financial information and student data for approval into the Redirection Page in the CCIP, showing its intended use of funds, by April 2, 2012.</p> <p><u>Systemic Correction</u></p> <p>There is no systemic correction required in this section, as the district was not found to be disproportionate in the 2011-12 school year.</p>	<p>Individual Correction for Fiscal Component required the following.</p> <p>The LEA was notified through separate communications regarding this finding, please follow those directions.</p>	<input checked="" type="checkbox"/> No

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 January 25-26, 2012 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	
		Required Actions	Must be addressed in CAP
ORC 3306.09(G)	OEC reviewed district spending related to gifted education. Evidence was provided to demonstrate that fiscal year 2011 gifted spending was equal to or more than fiscal year 2009 unit funding. Evidence was provided that 2009 levels of ESC services are maintained.	<u>Individual Correction</u> None <u>Systemic Correction</u> None	<input checked="" type="checkbox"/> NA

Component 2: Roster and Written Education Plans and Attestation

Per Ohio Administrative Code 3301-51-15 (D)(4), does the district have a current written education plan (WEP) for each student reported as served? Does each WEP include the following components?

- Goals for the students for each service to be provided;
- Specified methods for evaluating progress toward goals;
- Method and schedule for reporting progress to parents;
- Staff responsible for ensuring delivery of each service prescribed;
- Policies regarding waiver of assignments and rescheduling of tests;
- Deadline for next review of WEP; and
- Copy of WEP to parents and staff responsible for providing service listed?

Citation	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
		Required Actions	
OAC 3301-51-15(D)(4)	<p><i>Regarding copies of WEP provided to parents and staff responsible for providing service listed:</i></p> <ol style="list-style-type: none"> 1. A general education teacher was listed as responsible for implementation of the WEP and was marked excused from the meeting. It is unclear if she received a copy of the WEP. 2. On one WEP it is not clear which staff are responsible for implementing the WEP and if all responsible received a copy of the WEP. <p>The district staff provided additional evidence that all staff responsible received copies of WEPs for which they are responsible.</p>	<p><u>Individual Correction</u></p> <p>None</p> <p><u>Systemic Correction</u></p> <p>None</p>	<input checked="" type="checkbox"/> NA
OAC 3301-51-15(D)(4)	<p><i>Regarding method and schedule for reporting progress to parents:</i></p> <p>10 WEPS did not specify the method and schedule of reporting student progress to parents. The district has started the process for adding this information to WEPs.</p>	<p><u>Individual Correction</u></p> <p>The district must submit corrected copies of the WEPs to OEC for review. To obtain the student identification for these students, the district must contact Beth Hahn, OEC educational consultant, directly at (614) 995-3354, toll-free (877) 644-6338 or by e-mail at elizabeth.hahn@education.ohio.gov.</p> <p><u>Systemic Correction</u></p> <p>OEC will contact the district for submission of new records and review these records for evidence that the district is in compliance.</p>	<input checked="" type="checkbox"/> Yes

Component 3: Equitable Services and Attestation

Are all district students who meet the written criteria for a gifted service provided an equal opportunity to receive that service? Each gifted service offered in the district must be available to all eligible students in each building in the district at that grade level.

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

Component 4: Acceleration and Attestation

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

Citation	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
		Required Actions	
ORC 3324.10	WAPs were provided for early entrance to kindergarten, whole grade acceleration, and early graduation. The district provided evidence that they are implementing subject acceleration. The district provided evidence that they are implementing 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)	Documentation was provided that verified district compliance. All requirements regarding percentage of time providing direct instruction and having other duties related to gifted education were met.	<u>Individual Correction</u> None	<u>Systemic Correction</u> None	<input checked="" type="checkbox"/> NA

Component 6: Licensure Attestation

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

Citation	Evidence of Findings	Evidence of Correction		Must be addressed in CAP
		Required Actions		
OAC 3301-51-15(E)(3), OAC 3301-51-15(E)(6)	Copies of licenses for the gifted coordinator and the GISs were provided for review. Staff members hold the appropriate licensure or endorsement for the position of gifted coordinator and/or GIS.	<u>Individual Correction</u> None	<u>Systemic Correction</u> None	<input checked="" type="checkbox"/> NA

Component 7: Requirement for Minutes of Service Attestation

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

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

Component 8: Requirement for Regular Education Teacher Professional Development

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

Citation	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
		Required Actions	
OAC 3301-51-15(D)(3)(b)(i)	The district attested that this requirement is not applicable because no general education classes are reported as service.	<u>Individual Correction</u> None <u>Systemic Correction</u> None	<input checked="" type="checkbox"/> NA