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| Northwest Local School District IRN 049635 |
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**Ohio Department of Education, Office for Exceptional Children
2012-2013 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 March 5-7, 2013 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 March 5-7, 2013. During the IDEA Review, OEC consultants monitor the LEA's implementation of 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 February 9, 2013, the Northwest Local School District mailed 268 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 date on the school website.

On March 5, 2013, 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. Three parents and family members and two 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. Three attendees made comments during the public meeting. Written comment forms were available before, during and after the meeting. OEC did not receive any 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 and SST 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 March 5 and 6, 2013, OEC consultants reviewed 36 records of school age students with disabilities. An OEL&SR consultant, on March 7, 2013, reviewed four records as part of the Early Childhood Special Education Review. OEC selected records of a variety of children with disabilities from three buildings.

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

4. Staff/Administrative Interviews

On March 7, 2013, OEC consultants held four sessions of interviews with six administrators and 21 teachers, related services personnel and school psychologists. OEC interviews focused on the following review areas: Child Find; Delivery of Services; Least Restrictive Environment (LRE) and IEP alignment.

Findings

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

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

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

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

Corrective Action Plan (CAP)

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

- Improvement strategies to address all areas of identified non-compliance,
- Documentation/evidence of implementation of the strategies,
- Individuals responsible for implementing the strategies,
- Resources needed, and
- Completion dates.

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

The district must submit the corrective action plan to 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: September 18, 2013

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: November 1, 2013

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: May 8, 2014

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:** Tom Main, Educational Consultant, at (614) 387-0156, toll-free at (877) 644-6338, or by e-mail at tom.main@education.ohio.gov.
- **Gifted Education:** Rosemary Pearson, Educational Consultant, at (614) 644-2641, toll-free at (877) 644-6338, or by e-mail at rosemary.pearson@education.ohio.gov.

Special Education School Age/Preschool Components, OEC's Review Findings, and District Required Actions

Component 1: Child Find

Each school district shall adopt and implement written policies and procedures approved by the Ohio Department of Education, Office for Exceptional Children, that ensure all children with disabilities residing within the district, regardless of the severity of their disability, and who are in need of special education and related services are identified, located, and evaluated as required by the 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> All reevaluation records indicated that the child's reevaluation were completed within the three year timeline.</p> | <p><u>Individual Correction</u> None <u>Systemic Correction</u> None</p> | <input checked="" type="checkbox"/> NA |
| CF-2 | 300.305(a) | <p><u>Record Review</u> 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> None <u>Systemic Correction</u> None</p> | <input checked="" type="checkbox"/> NA |
| CF-3 | OAC 3301-51-06 (2) and OAC 3301-51-06(4) | <p><u>Record Review</u> Four school age initial evaluations did not appropriately document interventions provided to resolve concerns for the child performing below grade-level standards.</p> <p><u>Interviews</u> Staff stated that, in the past, referring a student to the Intervention Assistance Team (IAT) would automatically lead to testing, but that currently is not the practice. They explained that now more intervention strategies are used and they bring data and work samples to their meetings.</p> <p><u>Other Considerations</u> Administrators also indicated that the IAT meets to develop intervention strategies with the teacher prior to an evaluation.</p> | <p><u>Individual Correction</u> 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> The district must submit evidence to OEC of written procedures and practices in place regarding documentation of intervention and supports provided prior to completion of the initial evaluation team report. OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.</p> | <input checked="" type="checkbox"/> Yes A Corrective Action Plan is required due to meeting the 30% threshold of non-compliance. |

| Record Review Item | Regulation 34 CFR or OAC | Evidence of Findings | Evidence of Correction | Must be addressed in CAP |
|--------------------|--------------------------|--|--|---|
| | | | Required Actions | |
| CF-4 | 300.501(b)(1) | <p><u>Record Review</u></p> <p>Four school age student records did not show evidence that the evaluation planning team included the parent.</p> <p>All preschool student records showed evidence that the evaluation planning team included the parent.</p> | <p><u>Individual Correction</u></p> <p>The district must provide evidence that the parent was involved or provided the opportunity to participate (three documented attempts) in the evaluation planning process.</p> <p>The evidence may include; evaluation planning form, prior written notice, parent invitation, referral form or communication log.</p> <p>If the district cannot provide documentation that the parent was involved or provided the opportunity to participate in the evaluation planning process, the district must conduct evaluation planning with the parent.</p> <p><u>Systemic Correction</u></p> <p>OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.</p> | <p><input checked="" type="checkbox"/> No</p> <p>The district does <u>not</u> need to address this finding in a Corrective Action Plan.</p> |
| CF-5 | 300.305(a)(1) | <p><u>Record Review</u></p> <p>Ten school age student evaluations did not provide evidence that the evaluation planning team reviewed existing data on the child.</p> <p>All preschool student evaluations provided evidence that the evaluation planning team reviewed existing data on the child.</p> <p><u>Interviews</u></p> <p>Staff stated they thought the school psychologist was in charge of the planning meeting and would tell them what was needed.</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>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 | |
|--------------------|---|--|---|---|
| | | | Required Actions | Must be addressed in CAP |
| CF-6 | 300.305(a)(2) | <p><u>Record Review</u></p> <p>Nine school age student evaluations did not provide evidence that the evaluation planning team identified what additional data, if any, were needed.</p> <p>All preschool student evaluation provided 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>OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.</p> | <p><input checked="" type="checkbox"/> No</p> <p>The district does <u>not</u> need to address this finding in a Corrective Action Plan.</p> |
| CF-7 | 300.304(c)(4); OAC 3301-51-01; and OAC 3301-51-06 | <p><u>Record Review</u></p> <p>Seven school age student evaluations did not provide evidence that the evaluation addresses all areas related to the suspected disability.</p> <p>All preschool student evaluations provided evidence that the evaluation addresses all areas related to the suspected disability.</p> | <p><u>Individual Correction</u></p> <p>The district will convene the ETR team to conduct a reevaluation and provide evidence that the evaluation addresses all areas related to the suspected disability.</p> <p><u>Systemic Correction</u></p> <p>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-8 | 300.306(a)(1) | <p><u>Record Review</u></p> <p>Two school age student records did not show evidence that the parent of the child was involved in determining whether the child is a child with a disability.</p> <p>All preschool 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>Individual Correction</u></p> <p>The district must provide evidence that the parent was involved in determining whether the child is a child with a disability or evidence that the parent was provided the opportunity to participate in the eligibility determination as evidenced by three attempts to contact the parent. If not, the IEP team must reconvene the ETR meeting and provide OEC evidence of parent involvement.</p> <p><u>Systemic Correction</u></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-9 | 300.306(a)(1) | <u>Record Review</u> 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. | <u>Individual Correction</u> None <u>Systemic Correction</u> None | <input checked="" type="checkbox"/> NA |
| CF-10 | 300.306(a)(1); 300.305(a); and 3301-51-01 (B)(21) | <u>Record Review</u> Three school age reevaluations did not show evidence that a group of qualified professionals as appropriate to the suspected disability were involved in determining whether the child is a child with a disability. All preschool reevaluations showed evidence that a group of qualified professionals as appropriate to the suspected disability were involved in determining whether the child is a child with a disability. | <u>Individual Correction</u> The district must provide evidence that the IEP team and other qualified professionals participated in the eligibility determination. If not, the IEP team must reconvene the ETR meeting and provide OEC evidence of group participation. IEP Team Members include, but are not limited to: <ol style="list-style-type: none"> 1. Parent 2. Regular Education Teacher 3. Special Education Provider 4. District Representative 5. An individual who can interpret the instructional implications of evaluation results, 6. At the discretion of the parent or school district, other individuals who have knowledge or special expertise regarding the child, including related services personnel as appropriate; 7. Whenever appropriate, the child with a disability. <u>Systemic Correction</u> OEC will contact the district for submission of new records and review these records to determine compliance with this regulation. | <input checked="" type="checkbox"/> No The district does <u>not</u> need to address this finding in a Corrective Action Plan. |

Component 2: Delivery of Services

Each school district shall have policies, procedures and practices to ensure that each child with a disability has an IEP that is developed, reviewed, and revised in a meeting and implemented in accordance with 300.320 through 300.324.

| Record Review Item | Regulation 34 CFR or OAC | Evidence of Findings | Evidence of Correction | Must be addressed in CAP |
|--------------------|--------------------------|---|--|--|
| | | | Required Actions | |
| DS-1 | 300.320(a)(1)(i) | <p><u>Record Review</u></p> <p>Six school age and one 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>Interviews</u></p> <p>Staff explained that all students received instruction in the core curriculum, but teachers also use the extended standards as appropriate.</p> <p><u>Other Considerations</u></p> <p>A parent expressed concern that their child regressed over the summer in speech and other areas. Extended school year was explained to them by OEC staff.</p> | <p><u>Individual Correction</u></p> <p>The district must reconvene the IEP teams of the seven 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>OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.</p> | <p><input checked="" type="checkbox"/> No</p> <p>The district does <u>not</u> need to address this finding in a Corrective Action Plan.</p> |
| DS-2 | 300.320(a)(1) | <p><u>Record Review</u></p> <p>Eleven (11) school age and two preschool student IEPs did not contain Present Levels of Academic Achievement and Functional Performance (PLOP) that addressed the needs of the student.</p> <p><u>Interviews</u></p> <p>Staff described that they used OAA and OAT scores and the Brigance results in the PLOPs, however some of this data was not current.</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>One 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 areas of need</p> | <p><u>Individual Correction</u></p> <p>The district must reconvene the IEP team of the one IEP identified as noncompliant to review and amend the IEP to include 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>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-4 | 300.320(a)(2)(i)(A) | <p><u>Record Review</u></p> <p>One school age student IEP 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>Individual Correction</u></p> <p>The district must reconvene the IEP team of the one IEP identified as noncompliant to review and amend the IEP to include 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>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-5 | 300.320(a)(2)(i) | <p><u>Record Review</u></p> <p>Eleven (11) school age and two preschool student IEPs did not contain measurable annual goals.</p> <p><u>Interviews</u></p> <p>Teachers mentioned that they had some training on the six criteria. However, some staff stated that goals were set at current baseline achievement levels as opposed to identifying the progress levels the student will meet.</p> <p><u>Other Considerations</u></p> <p>Administrators indicated that all staff had responded well to the extended standards training.</p> | <p><u>Individual Correction</u></p> <p>The district must reconvene the IEP teams of the 13 IEP(s) identified as noncompliant to review and amend annual goals to contain the following six critical elements:</p> <ol style="list-style-type: none"> 1. Who? 2. Will Do What? 3. To What Level or 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 or 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>Twelve (12) school age and one 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>Teachers described accommodations and modifications as specially designed instruction as opposed to actual instruction that was different from what all students receive.</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 specially designed instruction to describe the adaptation of, as appropriate to the needs of the child, the content, methodology, or delivery of instruction.</p> <p><u>Systemic Correction</u></p> <p>The district must submit evidence to OEC of written procedures and practices in place regarding the IEP process of determining specially designed instruction.</p> <p>OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.</p> | <p><input checked="" type="checkbox"/> Yes</p> <p>A Corrective Action Plan is required due to meeting the 30% threshold of non-compliance.</p> |
| DS-7 | 300.320(a)(7) | <p><u>Record Review</u></p> <p>Nine 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 10 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>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>Eight 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 eight 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>OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.</p> | <p><input checked="" type="checkbox"/> No</p> <p>The district does <u>not</u> need to address this finding in a Corrective Action Plan.</p> |

| Record Review Item | Regulation 34 CFR or OAC | Evidence of Findings | Evidence of Correction | Must be addressed in CAP |
|--------------------|--------------------------|--|---|---|
| | | | Required Actions | |
| DS-9 | 300.320(a)(4) | <p><u>Record Review</u></p> <p>Eight 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 identify related services that address the needs of the child and support the annual goals.</p> <p><u>Other Considerations</u></p> <p>Parents stated that the Speech Pathologist and Occupational Therapist (OT) were not in the district everyday, but expressed concern that it would be beneficial if when they did come, it would be the same person each time.</p> | <p><u>Individual Correction</u></p> <p>The district must reconvene the IEP teams of the eight 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>OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.</p> | <p><input checked="" type="checkbox"/> No</p> <p>The district does <u>not</u> need to address this finding in a Corrective Action Plan.</p> |
| DS-10 | 300.320(a)(7) | <p><u>Record Review</u></p> <p>Four school age and one preschool student IEPs did not indicate 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 five 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>OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.</p> | <p><input checked="" type="checkbox"/> No</p> <p>The district does <u>not</u> need to address this finding in a Corrective Action Plan.</p> |
| DS-11 | 300.320(a)(7) | <p><u>Record Review</u></p> <p>Two school age 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 two IEPs identified as noncompliant to review and amend on the IEP the amount of time and frequency of the related services to be provided.</p> <p><u>Systemic Correction</u></p> <p>OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.</p> | <p><input checked="" type="checkbox"/> No</p> <p>The district does <u>not</u> need to address this finding in a Corrective Action Plan.</p> |

Component 3: Least Restrictive Environment (LRE) and IEP Alignment Each school district shall ensure that to the maximum extent appropriate, children with disabilities, including children in public or nonpublic institutions or other care facilities, are educated with children who are nondisabled; and that a continuum of alternative placements is available to meet the needs of children with disabilities for special education and related services.

| Record Review Item | Regulation 34 CFR or OAC | Evidence of Findings | Evidence of Correction | Must be addressed in CAP |
|--------------------|--------------------------|---|---|---|
| | | | Required Actions | |
| LRE-1 | 300.324(a)(2)(v) | <p><u>Record Review</u></p> <p>All school age and all preschool student IEPs identify assistive technology to enable the child to be involved in and make progress in the general education curriculum.</p> <p><u>Other Considerations</u></p> <p>A parent said that they had requested their student have a computer as an accommodation (assistive technology), but the parent believed that some team members implied that it was too expensive.</p> <p>Administrators stated that if a parent request involves finances they tell the parent they must check with the superintendent first before making a decision. However, they believed this had not happened very often.</p> | <p><u>Individual Correction</u></p> <p>None</p> <p><u>Systemic Correction</u></p> <p>None</p> <p><u>Recommendation</u></p> <p>The district representative must be knowledgeable about the availability of district resources, and have the authority to authorize and commit funds and resources. The district needs to review their practices and procedures of the roles and responsibilities of the district representative in an IEP meeting.</p> | <input checked="" type="checkbox"/> NA |
| LRE-2 | 300.320(a)(6)(i) | <p><u>Record Review</u></p> <p>Eight school age and one preschool 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><u>Interviews</u></p> <p>Staff discussions indicated that there was confusion in the differences between accommodations and modifications.</p> | <p><u>Individual Correction</u></p> <p>The district must reconvene the IEP teams of the nine 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"/> 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-3 | 300.320(a)(4) | <p><u>Record Review</u></p> <p>Twelve (12) school age student IEPs did not identify modifications to enable the child to be involved in and make progress in the general education curriculum.</p> <p>All preschool student IEPs identified modifications to enable the child to be involved in and make progress in the general education curriculum</p> <p><u>Interviews</u></p> <p>Administrators stated that while completing their walk-throughs in classrooms, they could determine if students were receiving their modifications and/or accommodations.</p> | <p><u>Individual Correction</u></p> <p>The district must reconvene the IEP teams of the 12 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.</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. |
| LRE-4 | 300.320(a)(4) | <p><u>Record Review</u></p> <p>Four school age 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>All 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>The district must reconvene the IEP team 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.</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 | |
| LRE-5 | 300.320(a)(5) | <p><u>Record Review</u></p> <p>Eleven (11) school age and three 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>Teachers stated that the goal was for all students with disabilities be in the general education classroom. They explained that if a student was overwhelmed, significantly below the level of the peers or had behavior difficulties the resource room was sometimes found to be the best placement for some subject areas.</p> | <p><u>Individual Correction</u></p> <p>The district must reconvene the IEP teams of the 14 IEPs identified as noncompliant to review and include a justification for why the child was removed from the regular education classroom.</p> <p>The justification should:</p> <ul style="list-style-type: none"> • Be based on the needs of the child, not the disability. • Reflect that the team has given adequate consideration to meeting the student's needs in the regular classroom with supplementary aids and services. • Document that the nature or severity of the disability is such that education in regular education classes, even with the use of supplementary aids and services, cannot be achieved satisfactorily. • Describe potential harmful effects to the child or others, if applicable. <p><u>Systemic Correction</u></p> <p>The district must submit evidence to OEC of written procedures and practices in place regarding the 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) | <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>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>Six school age student IEPs did not indicate that the IEP Team included a regular education teacher.</p> <p>All preschool student IEPs indicated that the IEP Team included a regular education teacher.</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 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 with all required members present. <p><u>Systemic Correction</u></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-8 | 300.321(3) | <p><u>Record Review</u></p> <p>One school age student IEP did not indicate that the IEP Team included a special education teacher.</p> <p>All preschool student IEPs indicated 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>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-9 | 300.321(4) | <p><u>Record Review</u></p> <p>One school age student IEP 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>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 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>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-10 | 300.321(5) | <u>Record Review</u> All school age and all preschool student IEPs indicated that the IEP Team included 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, 2011; 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 had an IEP in effect as reported on the LEA's December 1, 2011 Child Count Report. | <u>Individual Correction</u> None <u>Systemic Correction</u> None | <input checked="" type="checkbox"/> NA |
| DV-2 | 300.645 R.C. 3301.07.14 | <u>Record Review</u> All school age and preschool student ETRs indicated that the child had an ETR in effect as reported on the LEA's December 1, 2011 Child Count Report. | <u>Individual Correction</u> None <u>Systemic Correction</u> None | <input checked="" type="checkbox"/> NA |

| Record Review Item | Regulation 34 CFR or OAC | Evidence of Findings | Evidence of Correction | Must be addressed in CAP |
|--------------------|---|---|--|--|
| | | | Required Actions | |
| DV-3 | SPP Indicator 20: Accurate and Timely Reporting of Special Education Event Record | <u>Record Review</u> All school age and preschool student records had accurate student data reported by the LEA through the Education Management Information System (EMIS) Report, specifically in the following area(s): a) DOB b) IEP date (IIEP, RIEP, TIEP, CIEP, or FIEP events) c) ETR dates (IETR, RETR, TETR) d) Referral date e) Consent date f) Disability category as indicated as an outcome of ETR g) Admission date h) Withdrawal date i) Non-compliance reason for ETR or IEP date | <u>Individual Correction</u> None <u>Systemic Correction</u> None | <input checked="" type="checkbox"/> NA |
| DV-4 | SPP Indicator 11 300.301(c)(1)(i) | <u>Record Review</u> All school age and preschool student initial evaluations were conducted within 60 day timeline of the district receiving parental consent for the evaluation. | <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>Ten (10) 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>Individual Correction</u></p> <p>Ten (10) current IEPs 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 10 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> | <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 FY12 FERs for IDEA Part B and Early Childhood IDEA. The district's financial detail (FINDET) report projects to match the current year budget in the CCIP by subtotaling FINDET transactions according to object codes (100, 200, 400, 500, 600 & 800) for the year to date. The year to date expenditures will be reviewed for coding accuracy. 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>After a CCIP review the district has submitted its FY12 FERs for IDEA Part B and Early Childhood IDEA.</p> <p>The FY13 actual expenditures from IDEA funding do not match—the budget. All projected expenditures in the budget were for purchased services 400s while actual expenditures were predominately for benefits - the 200s. This is not allowable and needs to be corrected through accounting procedures.</p> <p>The following are excerpts from a recent report from the Auditor of State:</p> <p>Significant Deficiency <i>All local public offices should maintain an accounting system and accounting records sufficient to enable the public office to identify, assemble, analyze, classify, record and report its transactions, maintain accountability for the related assets (and liabilities, if generally accepted accounting principles apply), document compliance with finance-related legal and contractual requirements and prepare financial Statements. This includes posting expenditures of State and Federal Funds directly to the grant funds at the time the expenditures are made instead of recording correcting entries and/or posting corrections. While testing expenditures for the Fiscal Year 2012 Title I Grant, Education Jobs Grant, and Title VI-B Grant and Title I Grant and Title II-D Grant for Fiscal Year 2011 we found that many of the expenditures</i></p> | <p><u>Individual Correction</u></p> <p>None</p> <p><u>Systemic Correction</u></p> <p>The district must make accounting corrections that match expenditures allocable to the budget with the IDEA funds.</p> | | <input checked="" type="checkbox"/> Yes |

| Findings Citation | Evidence | Evidence of Correction | | Must be addressed in CAP |
|----------------------|---|------------------------|----------|--------------------------------|
| | | Required Actions | Date Due | |
| | <p>were not made directly from the grant funds. Expenditures were initially posted to the General Fund and then allocated to the grants funds by means of posting corrections. We also noted instances where expenditures were posted to the Title I Grant Fund, Fiscal Year 2011, and then transferred to the General Fund.</p> <p>Auditors recommend We recommend expenditures of state and federal funds be posted directly to the state or federal grant fund at the time the expenditures are made instead of making correcting entries at a later date to re-allocate the expenditures.</p> <p>The Office for Exceptional Children concurs with these findings and asks that the district make accounting corrections that match expenditures allocable to the budget with the IDEA funds requested. The districts 587 funds were allocable to the budget and coded correctly.</p> | | | |

Component 2: Payroll Expenditures

The district/school is able to document that the 516 and 587 funds were expended in FY13 for an appropriate purpose; payroll expenditures are supported by Personal Activity Reports (PAR) showing the Time and Effort 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 budget are in agreement.

| Findings Citation | Evidence | Evidence of Correction | | Must be addressed in CAP |
|-------------------|---|---|----------|--|
| | | Required Actions | Date Due | |
| 300.202 | <p>No 516 funds were budgeted in payroll and no expenditures should have been made in this area.</p> <p>The district was able to document that 587 funds were expended in FY13 for an appropriate purpose; payroll expenditures are supported by Personal Activity Reports (PAR) showing the Time and Effort 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 budget are in agreement.</p> | <p><u>Individual Correction</u> None</p> <p><u>Systemic Correction</u> None</p> | | <input checked="" type="checkbox"/> NA |

Component 3: Non-Payroll Expenditures

The district/school is able to document that the 516 and 587 funds that were expended in FY13 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 FY13 expenditures for IDEA were not allocable to the budget. All expenditures in the budget were for purchased services 400s while actual expenditures were predominately for benefits - the 200s.</p> <p>There were not any 587 funds budgeted in non-payroll.</p> | <p><u>Individual Correction</u> None</p> <p><u>Systemic Correction</u> Use accounting procedures to account for expenditures allocable to the budget. This will require making direct payment to the ESC for IDEA work that has been contracted for. It may be necessary to have the ESC send back general funds to the district to that can be used as general funds in lieu of the erroneous use of IDEA funds as 001 funds.</p> | | <input checked="" type="checkbox"/> No |

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

If the district/school expended FY13 516 and 587 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 IDEA 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 | There were no funds expended in FY13 in 516 and 587 funds for Capital Outlay and/or equipment. | <u>Individual Correction</u> None <u>Systemic Correction</u> None | | <input checked="" type="checkbox"/> NA |

Component 5: Equipment inventory policy and procedures

The district/school retains control and administration of FY13 516 and 587 funds used to purchase materials, equipment and property (i.e. bus) purchased with those funds for the uses and purposes 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 | There were no funds expended in FY13 in 516 and 587 funds for Capital Outlay and/or equipment. | <u>Individual Correction</u> None <u>Systemic Correction</u> None | | <input checked="" type="checkbox"/> NA |

Component 6: Non-Public Count and Proportionate Share

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

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

| Findings Citation | Evidence | Evidence of Correction | | Must be addressed in CAP |
|-------------------------|--|--|----------|--|
| | | Required Actions | Date Due | |
| 300.130 through 300.144 | This was not applicable Northwest Local School District does not have any nonpublic schools. | <u>Individual Correction</u> None <u>Systemic Correction</u> None | | <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 | The district at the time of the review altered their notice and agenda for the May Title I meeting to include IDEA and be in compliance. They previously would ask for input for IDEA but no meeting would be scheduled. | <u>Individual Correction</u> None <u>Systemic Correction</u> None | | <input checked="" type="checkbox"/> No |

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 CEIS is 15% (or less if voluntary) 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. The district has developed a means through which to track the expenditure of Part B funds for CEIS in its financial system and is able to create a report showing the expenditure of funds for CEIS. The district has a plan in place to utilize the funds for CEIS. 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 | This section was not applicable. The district did not redirect funds or reduce its local expenditures. | <u>Individual Correction</u> None <u>Systemic Correction</u> None | | <input checked="" type="checkbox"/> NA |

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

Component 1: Gifted Budget

- A. Based on Section 267.30.50 in Am. Sub. HB 153, 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?
- B. If the district in fiscal year 2009 received gifted student services from an ESC, and the ESC received gifted unit funding in fiscal year 2009, did the district 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 an amount not less than the amount of gifted unit funding expended by an ESC in fiscal year 2009 for the district's students?
- C. Did the district spend no less than their FY09 supplemental identification amount on gifted identification?

| Citation | Evidence of Findings | Evidence of Correction | Must be addressed in CAP |
|------------------------------------|--|--|---|
| | | Required Actions | |
| Section 267.30.50, Am. Sub. HB 153 | <p>The district did not spend any money on gifted services in FY 12. The district implemented services for eighth grade math students in FY 13 but this service does not meet the MOE requirements for the current school year.</p> <p>OEC reviewed expenditure reports for identification. The district did not spend the required amount on gifted identification.</p> <p>The district continues to have a .11 FTE coordinator from the ESC as they did in 2009.</p> | <p><u>Individual Correction</u> None</p> <p><u>Systemic Correction</u> The district must write a Corrective Action Plan which will include a plan to serve and identify gifted students that will bring the district into fiscal compliance.</p> | <input checked="" type="checkbox"/> Yes |

Component 2: Gifted Identification

Per Ohio Revised Code 3324.04(B)(2), how does the district assure inclusion in screening and assessment procedures for minority and disadvantaged students, children with disabilities and children for whom English is a second language?

| Citation | Evidence of Findings | Evidence of Correction | Must be addressed in CAP |
|-------------------|--|---|--|
| | | Required Actions | |
| ORC 3324.04(B)(2) | <p>OEC reviewed identification procedures. The district provided evidence to document that there are provisions in place to insure inclusion in screening and assessment procedures for minority and disadvantaged students, children with disabilities and children for whom English is a second language. Whole grade screening is provided for all first and second grade students.</p> | <p><u>Individual Correction</u> None</p> <p><u>Systemic Correction</u> None</p> | <input checked="" type="checkbox"/> NA |

Component 3: 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 required attributes were present on all WEPs except for evidence that parents receive a copy. | <u>Individual Correction</u> None <u>Systemic Correction</u> The district must write a CAP that includes a plan to assure that all parents receive a copy of the WEP. | <input checked="" type="checkbox"/> Yes |

Component 4: 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. | <u>Individual Correction</u> None <u>Systemic Correction</u> None | <input checked="" type="checkbox"/> NA |

Component 5: Acceleration and Attestation

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

| Citation | Evidence of Findings | Evidence of Correction | Must be addressed in CAP |
|-------------|---|--|--|
| | | Required Actions | |
| ORC 3324.10 | The district provided evidence that they have implemented their acceleration policy. OEC reviewed district acceleration policies and procedures. An early entrance IAS form was reviewed. Acceleration was discussed at the opening staff meeting. Information about acceleration is included in the gifted brochure. | <u>Individual Correction</u> None <u>Systemic Correction</u> None | <input checked="" type="checkbox"/> NA |

Component 6: 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) | The schedule for the gifted intervention specialist was reviewed. It was determined that this staff member is not actually working as a gifted intervention specialist because not all of her students are gifted. She should be coded as a regular classroom teacher and only the portion of her salary attributed to service for gifted students can be counted toward the district's MOE. | <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 does not employ any gifted intervention specialists. | <u>Individual Correction</u> None <u>Systemic Correction</u> None | <input checked="" type="checkbox"/> NA |

Component 8: Licensure

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) | Licenses for gifted personnel were reviewed. One staff member holds a gifted license but is not currently working as a GIS. | <u>Individual Correction</u> None <u>Systemic Correction</u> None | <input checked="" type="checkbox"/> NA |

Component 9: Requirement for Regular Education Teacher Professional Development and Attestation

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 will need to report their math services as gifted services in the regular classroom. PD and support are not required for this teacher because she holds a gifted license. | <u>Individual Correction</u> None <u>Systemic Correction</u> None | <input checked="" type="checkbox"/> NA |