

<b>Piqua City School District IRN 044644</b>
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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 February 12, 13, and 14, 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 February 12–14, 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; and
- 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 28, 2013, the Piqua City School District mailed 624 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 February 12, 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. Seven parents and family members and two State Support Team (SST) Region 10 representatives attended the public meeting. Attendees could speak to OEC representatives publicly in the meeting or individually, provide written comments, or both. seven attendees made comments during the public meeting. Written comment forms were available before, during and after the meeting. OEC received no 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 February 12 and 13, 2013, OEC consultants reviewed 41 records of school age students with disabilities. An OEL&SR consultant reviewed seven records as part of the Early Childhood Special Education Review. OEC selected records of a variety of children with disabilities from eight buildings.

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

## 4. Staff/Administrative Interviews

On February 13 and 14, 2013, OEC consultants held four sessions of interviews with 15 administrators, 11 general education teachers, 28 intervention specialists, ten related services personnel and four school psychologists. OEC interviews focused on the following review areas: Child Find; Delivery of Services; Least Restrictive Environment (LRE) and IEP alignment; and Data Verification.

## **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 Piqua 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 John Magee, OEC Lead Consultant at [john.magee@education.ohio.gov](mailto:john.magee@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: May 10, 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: September 17, 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: March 28, 2014**

For questions about specific components of this report please contact:

- **Special Education School Age:** John Magee, OEC Lead Consultant, at (614) 728-1115, toll-free at (877) 644-6338, or by e-mail at [John.Magee@education.ohio.gov](mailto:John.Magee@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](mailto: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](mailto: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](mailto: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 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></p> <p>One reevaluation record indicated that the child's reevaluation was not completed within the three year timeline.</p> <p><u>Interviews</u></p> <p>Staff members described a reevaluation timeline tracking system that notifies all personnel who have responsibilities in the process.</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>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)	<p><u>Record Review</u></p> <p>Two school age initial evaluations did not appropriately document interventions provided to resolve concerns for the child performing below grade-level standards.</p> <p><u>Interviews</u></p> <p>District personnel at all levels described a Response to Intervention process that involves progress monitoring and data collection for individually targeted student interventions. This information is funneled into the initial evaluation ETR.</p> <p><u>Other Considerations</u></p> <p>The process described above has been in place for only a short time, so results have not been seen for every initial evaluation as of yet.</p>	<p><u>Individual Correction</u></p> <p>OEC has verified that these students have a current IEP in place, so no additional individual correction is required.</p> <p><u>Systemic Correction</u></p> <p>The district must submit evidence to OEC of written procedures and practices in place regarding documentation of intervention and supports provided prior to completion of the initial evaluation team report.</p> <p>OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.</p>	<p><input checked="" type="checkbox"/> Yes</p> <p>A Corrective Action Plan is required due to meeting the 30% threshold of non-compliance.</p>
CF-4	300.501(b)(1)	<p><u>Record Review</u></p> <p>Three school age student records did not show evidence that the evaluation planning team included the parent.</p> <p>All preschool student records contained evidence that the evaluation planning team included the parent.</p> <p><u>Interviews</u></p> <p>Interview responses outlined an extensive process that keeps parents informed and involved in every step of the ETR protocol.</p> <p><u>Other Considerations</u></p> <p>Some parents were concerned that the needs of their children were not being met and that the district was not providing specific services.</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 or provide evidence of the parent's involvement or opportunity to participate.</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-5	300.305(a)(1)	<p><u>Record Review</u></p> <p>All school age student evaluations provided evidence that the evaluation planning team reviewed existing data on the child.</p> <p>Five 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>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>One school age and two preschool student evaluations 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>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>All school age student evaluations provided evidence that the evaluation addresses all areas related to the suspected disability.</p> <p>Six preschool student evaluations did not provide evidence that the evaluation addresses all areas related to the suspected disability.</p> <p><u>Other Considerations</u></p> <p>The preschool evaluation planning did not include data from all four required areas for preschool children.</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>

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
CF-8	300.306(a)(1)	<p><u>Record Review</u></p> <p>Six 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 contained 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>Staff members explained district-wide efforts to contact parents to ensure that they are included in the evaluation determination meetings. There was some confusion about the requirement to document three separate attempts to hold the meeting with the parent in attendance.</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>
CF-9	300.306(a)(1)	<p><u>Record Review</u></p> <p>All school age student initial evaluations contained 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>Two preschool student initial evaluations did not show evidence that a group of qualified professionals as appropriate to the suspected disability were involved in determining whether the child is a child with a disability.</p> <p><u>Interviews</u></p> <p>School leaders explained recent efforts to ensure that all necessary members are present at ETR meetings.</p>	<p><u>Individual Correction</u></p> <p>The district must provide evidence that a group of qualified professionals participated in the eligibility determination. If not, the IEP team must reconvene the ETR meeting and provide OEC evidence of group participation.</p> <p>A group of qualified professionals includes the following, but is not limited to:</p> <ul style="list-style-type: none"> <li>• Parent</li> <li>• Additional group members: <ul style="list-style-type: none"> <li>• The child's regular education teacher; or a regular classroom teacher qualified to teach a child of his or her age; or</li> <li>• For a preschool child an individual qualified by the SEA to teach a child of his or her age; and</li> <li>• At least one person qualified to conduct individual diagnostic examinations of children.</li> </ul> </li> </ul>	<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	
			<u>Systemic Correction</u> OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.	
CF-10	300.306(a)(1); 300.305(a); and 3301-51-01 (B)(21)	<u>Record Review</u> Six school age and one preschool 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.  <u>Interviews</u> School leaders explained recent efforts to ensure that all necessary members are present at ETR meetings.	<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"> <li>1. Parent</li> <li>2. Regular Education Teacher</li> <li>3. Special Education Provider</li> <li>4. District Representative</li> <li>5. An individual who can interpret the instructional implications of evaluation results,</li> <li>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;</li> <li>7. Whenever appropriate, the child with a disability.</li> </ol> <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>One school age student IEP 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>Individual Correction</u></p> <p>The district must reconvene the IEP team of the one IEP identified as noncompliant to review and amend the IEP to include a statement of how the child's disability affects the child's participation in appropriate activities to access, participate and progress in the general education curriculum.</p> <p><u>Systemic Correction</u></p> <p>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>Twelve (12) school age and three 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>During interviews several staff members at all levels described how progress monitoring data is collected and translated into usable information in the present levels.</p> <p><u>Other Considerations</u></p> <p>Sometimes the IEP present levels contained an excess of information that had little or no bearing on any specific student need.</p>	<p><u>Individual Correction</u></p> <p>The district must reconvene the IEP teams of the 15 IEPs identified as noncompliant to review and amend the PLOP related to each goal to include:</p> <ul style="list-style-type: none"> <li>• A summary of current daily academic/behavior and/or functional performance (strengths and needs);</li> <li>• Baseline data provided for developing a measurable goal.</li> <li>• For preschool, the PLOP should relate to the child's developmental domains, functional performance and pre-academic skills.</li> </ul> <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)	<u>Record Review</u> Two school age and one preschool student IEPs did not contain annual goals that address the child's academic area(s) of need.	<u>Individual Correction</u> The district must reconvene the IEP teams of the three IEPs identified as noncompliant to review and amend the IEP to include annual goals that address the academic needs that were identified in the IEP or provide evidence that the IEP team, based on the severity of the needs of the child, decided to prioritize addressing the needs.  <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.
DS-4	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 functional area(s) of need.  All preschool student IEPs contained annual goals that address the child's functional 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 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  <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.

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>Sixteen (16) school age and seven preschool student IEPs did not contain measurable annual goals.</p> <p><u>Other Considerations</u></p> <p>Staff members attended recent SST-10 professional development sessions on developing measurable goals. This training is beginning to become evident in IEPs written on later dates.</p>	<p><u>Individual Correction</u></p> <p>The district must reconvene the IEP teams of the 23 IEPs identified as noncompliant to review and amend annual goals to contain the following six critical elements:</p> <ol style="list-style-type: none"> <li>1. Who?</li> <li>2. Will Do What?</li> <li>3. To What Level or Degree?</li> <li>4. Under What Conditions?</li> <li>5. In What Length of Time?</li> <li>6. How Will Progress Be Measured?</li> </ol> <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"> <li>1. Who?</li> <li>2. Will Do What?</li> <li>3. To What Level or Degree?</li> <li>4. Under What Conditions?</li> <li>5. In What Length of Time?</li> <li>6. How Will Progress Be Measured?</li> </ol> <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 <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>Eight 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>Interviewees at all levels described methods to identify and develop specially designed instruction to address annual goals. Teachers keep data binders for each student to help track progress and inform efforts to individualize instruction.</p>	<p><u>Individual Correction</u></p> <p>The district must reconvene the IEP teams of the nine IEPs identified as noncompliant to review and amend the specially designed instruction to describe the adaption of, as appropriate to the needs of the child, the content, methodology, or delivery of instruction.</p> <p><u>Systemic Correction</u></p> <p>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-7	300.320(a)(7)	<p><u>Record Review</u></p> <p>Ten 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 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>Three 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 three 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>Five school age student IEPs did not identify related services that address the needs of the child and support the annual goals.</p> <p>All preschool student IEPs identified related services that address the needs of the child and support the annual goals.</p>	<p><u>Individual Correction</u></p> <p>The district must reconvene the IEP teams of the five 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>One school age and one preschool student IEP 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 two IEPs identified as noncompliant to review and amend the IEP to include the location where the related services will be provided.</p> <p><u>Systemic Correction</u></p> <p>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>One school age and one preschool student IEP did not identify assistive technology to enable the child to be involved in and make progress in the general education curriculum.</p> <p><u>Other Considerations</u></p> <p>In some cases assistive technology was mentioned in the IEP but not specified in the section seven AT area.</p>	<p><u>Individual Correction</u></p> <p>The district must reconvene the IEP teams of the two IEPs identified as noncompliant to review assistive technology and/or services that would directly assist the child with a disability to increase, maintain, or improve their functional capabilities and include them on the IEP.</p> <p><u>Systemic Correction</u></p> <p>The district must submit evidence to OEC of written procedures and practices in place regarding assistive technology.</p> <p>OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.</p>	<p><input checked="" type="checkbox"/> Yes</p> <p>A Corrective Action Plan is required due to meeting the 30% threshold of non-compliance.</p>
LRE-2	300.320(a)(6)(i)	<p><u>Record Review</u></p> <p>Sixteen (16) school age and two preschool student IEP(s) did not identify accommodations provided to enable the child to be involved in and make progress in the general education curriculum.</p> <p><u>Other Considerations</u></p> <p>In some records, the extent of the accommodations was not specified, e.g., the amount of or conditions for extended time.</p>	<p><u>Individual Correction</u></p> <p>The district must reconvene the IEP teams of the 18 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>	<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-3	300.320(a)(4)	<p><u>Record Review</u></p> <p>Eight 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>There was some confusion expressed during interviews concerning the difference between accommodations and modifications.</p> <p><u>Other Considerations</u></p> <p>At times, the extent of modifications for children was not explained in the IEP.</p>	<p><u>Individual Correction</u></p> <p>The district must reconvene the IEP teams of the eight 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>Five school age and three preschool student IEPs did not identify supports for school personnel to enable the child to be involved in and make progress in the general education curriculum.</p> <p><u>Other Considerations</u></p> <p>Supports for school personnel were often mentioned in the IEP, but not always described as needed: who will do what for whom, for what purpose, and over what time period.</p>	<p><u>Individual Correction</u></p> <p>The district must reconvene the IEP teams of the eight 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>Twelve (12) school age 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>Interview responses substantiated a need for additional professional development concerning the justification for removing a student with disabilities from the regular education setting.</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"> <li>• Be based on the needs of the child, not the disability.</li> <li>• Reflect that the team has given adequate consideration to meeting the student's needs in the regular classroom with supplementary aids and services.</li> <li>• 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.</li> <li>• Describe potential harmful effects to the child or others, if applicable.</li> </ul> <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>Seven 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>Interviews</u></p> <p>District personnel explained that getting the necessary people to IEP and ETR meetings had been an issue in the past, but has been corrected recently.</p>	<p><u>Individual Correction</u></p> <p>For the seven IEPs identified as noncompliant, the district must:</p> <ul style="list-style-type: none"> <li>• Provide evidence of parent participation at the IEP meeting, <b>or</b></li> <li>• Provide documentation of at least three attempts made by the district to ensure parent participation, <b>or</b></li> <li>• Reconvene the IEP team to review the IEP with the parent.</li> </ul> <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>	<input checked="" type="checkbox"/> No <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 six preschool student IEPs did not indicate that the IEP Team included a regular education teacher.</p> <p><u>Interviews</u></p> <p>District personnel indicated that this had been an issue in the past that has been corrected.</p> <p><u>Other Considerations</u></p> <p>Some parents were concerned that regular education teachers either did not attend ETR/IEP meetings, were excused, or left the meeting after a very short time.</p>	<p><u>Individual Correction</u></p> <p>For the ten IEPs identified as noncompliant, the district must:</p> <ul style="list-style-type: none"> <li>• Provide documentation that the parent was informed prior to the IEP meeting that the regular education teacher would not participate in the meeting, <b>and</b></li> <li>• 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, <b>or</b></li> <li>• Reconvene the IEP team to review the IEP with all required members present.</li> </ul> <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>	<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-8	300.321(3)	<u>Record Review</u> All school age and preschool student IEPs indicated that the IEP Team included a special education teacher.	<u>Individual Correction</u> None  <u>Systemic Correction</u> None	<input checked="" type="checkbox"/> NA
LRE-9	300.321(4)	<u>Record Review</u> Two school age student IEPs did not indicate that the IEP Team included an LEA representative.  All preschool student IEPs indicated that the IEP Team included an LEA representative.	<u>Individual Correction</u> For the two IEPs identified as noncompliant, the district must: <ul style="list-style-type: none"> <li>• Provide documentation that the parent was informed prior to the IEP meeting that the LEA representative would not participate in the meeting, <b>and</b></li> <li>• 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, <b>or</b></li> <li>• Reconvene the IEP team to review the IEP will all required members present.</li> </ul> <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.
LRE-10	300.321(5)	<u>Record Review</u> All school age and 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, 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 IEP(s) 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 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
DV-3	SPP Indicator 20: Accurate and Timely Reporting of Special Education Event Record	<u>Record Review</u> Six school age student records had inaccurate student data reported by the LEA through the Education Management Information System (EMIS), 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> 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	
		All preschool student records had student data reported by the LEA through the Education Management Information System (EMIS).		
DV-4	SPP Indicator 11 300.301(c)(1)(i)	<p><u>Record Review</u></p> <p>One school age student initial evaluation reported as being conducted within 60 days of the district receiving parental consent for the evaluation was not conducted within the required timeline.</p> <p>All preschool student initial evaluation(s) reported as being conducted within 60 days of the district receiving parental consent for the evaluation were conducted within the required timeline.</p>	<p><u>Individual Correction</u></p> <p>The district has already demonstrated individual correction by completing, although late, the initial evaluation.</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>	<input checked="" type="checkbox"/> No The district does <u>not</u> need to address this finding in a Corrective Action Plan.
DV-5	SPP Indicator 12 300.124	<p><u>Record Review</u></p> <p>All preschool IEPs contained evidence that an IEP was in place for 3 year olds transitioning from Early Intervention Programs (0-3 years) on or before the child's third birthday.</p>	<p><u>Individual Correction</u></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	
DV-6 A/B	SPP Indicator 20 for Secondary Transition Plans	<p><u>Record Review</u></p> <p>Eleven (11) 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"> <li>1. There are appropriate measurable postsecondary goal(s).</li> <li>2. The postsecondary goals are updated annually.</li> <li>3. The postsecondary goals were based on age appropriate transition assessment.</li> <li>4. There are transition services that will reasonably enable the student to meet the postsecondary goal(s).</li> <li>5. The transition services include courses of study that will reasonably enable the student to meet the postsecondary goal(s).</li> <li>6. The annual goal(s) are related to the student's transition service needs.</li> <li>7. There is evidence the student was invited to the IEP Team Meeting where transition services were discussed.</li> <li>8. When appropriate, there is evidence that a representative of any participating agency was invited to the IEP Team Meeting.</li> </ol> <p><u>Other Considerations</u></p> <p>The need for high quality transition planning and professional development was discussed with district personnel.</p>	<p><u>Individual Correction</u></p> <p>Eleven (11) 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 11 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 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 subtotalling 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>Piqua City Schools’ treasurer provided an FY13 Accounting Report (ACCRTP) and Financial Detail Report (FINDET) prior to the site visit.</p> <p>The reports were complete and accurate. The amounts documented in the FINDET were in alignment with the FY13 budget in the CCIP. Additional expenditures for one staff person that should not have been included in the salaries and benefits were identified during the review.</p> <p>The district to date had utilized approximately 44% of its Fund 516 amounts in Object Code 100 (though this amount will be corrected to account for the improper staff person), 54% of its Object Code 200 and 66% of its Object Code 400</p> <p>The FY 13 Fund 516 allocation is \$ 806,286.47, with \$50,266.65 in carryover. The budget is consistent with the FY12 budget.</p> <p>The FY13 Early Childhood allocation (Fund 587) is \$21,792.93. That amount is redirected to the Miami Co. ESC for early childhood services.</p>	<p><u>Individual Correction</u> None</p> <p><u>Systemic Correction</u> None</p> <p>The district submitted an amended ACCRPT showing that a journal correction in the amount of \$15,693.72 was completed for the one staff member mistakenly included in Fund 516 expenditures. This correction will result in a change in the percentages shown in the <b>Evidence</b> section. It will also result in an additional available balance in Object Code 100.</p>		<input checked="" type="checkbox"/> No

## 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>The FY13 ACCRPTT listed five staff persons funded though Fund 516 funds – 3 intervention specialists and two nurses. Expenditures were appropriate and in alignment with the budget. All staff funded in FY13 hold appropriate licensure. It was determined that Piqua City Schools did not have a procedure in place to assure that semi-annual certifications are obtained for the staff working under a single cost objective activity funded with Part B funds. The district has reviewed the information in Auditor's Circular A-87 and has demonstrated the intent to comply with the requirement. During the site visit, Piqua administration acquired signed Semi-Annual Certification forms from the two staff funded with Part B Funds for the July1-December31, 2012 time period.</p> <p>Appropriate daily/weekly assignment schedules were provided for the two nurses.</p> <p>Financial coding was inappropriate for all of the staff, including the one inappropriately include in the ACCRPT. The district used Function Code 1236 – Developmentally Handicapped, as coding for those five staff. The district must determine the student handicapping condition and grade levels and properly designate the instructional staff serving those students using the proper USAS code. The two nurses, more appropriately could have been coded as 2134 – Nurse Services.</p> <p>Position descriptions were provided by the treasurer's office for each funded position.</p> <p>The district submitted a corrected ACCRPT subsequent to the site visit to show that one staff person has been removed from the listing of staff funded through Part B funds.</p>	<p><u>Individual Correction</u></p> <ol style="list-style-type: none"> <li>1. To assure compliance with the Semi-Annual Certification requirement, Piqua City Schools must provide a copy of the second half year certifications for the two staff persons appropriately funded with Part B funds in FY13.</li> <li>2. During discussion with the district treasurer and special education director, it was determined that the incorrect Function Codes would be corrected to identify the appropriate cost center for staff funded with Part B funds. An amended ACCRPT will be submitted to OEC.</li> </ol> <p><u>Systemic Correction</u></p> <ol style="list-style-type: none"> <li>3. Piqua City Schools must provide a copy of the procedures that it will follow to review positions being funded with Part B funds and assure that the financial coding for such staff is in compliance with USAS regulations.</li> </ol>	<p><b>1. No later than July 31, 2013.</b></p> <p><b>2. 30 days after receipt of the summary report.</b></p> <p><b>3. Within one year after the submission of the CAP.</b></p>	<p><input checked="" type="checkbox"/> Yes, if not submitted at the requested time for items 1 and 2.</p> <p><input checked="" type="checkbox"/> Yes for item 3.</p>

**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>From the information provided in the FINDET, the Piqua City Schools was provided a list of 4 vouchers that were to be reviewed from FY13 Fund 516. There were no non-payroll expenditures from Fund 587 as the funds were redirected to the ESC. The district provided appropriate documentation, including the voucher, invoice, purchase order or receipt for each item. The expenditures were for an appropriate purpose and were reasonable for the program. The Contract for Services with the Miami Co ESC was appropriate.</p> <p>The coding detail in the vouchers was consistent with the information provided in the FINDET. The coding used by the district for special education purposes correct in all cases, however, in one case, pertaining to the agreement with the ESC, Function Code 1236 – Developmentally Handicapped was used. The district cited that historically function code 1236 was used in purchases made with Part B funds. A more accurate coding is required.</p>	<p><u>Individual Correction</u></p> <p>None</p> <p><u>Systemic Correction</u></p> <p>None</p> <p><b><u>Recommendation:</u></b></p> <p>It is recommended that the district determine whether Function Code 1239 or 1339 is more appropriate to describe the services being provided by the ESC</p> <p>It is also recommended that the district administration developed a process through which each purchase order or requisition coming from the Special Education Director to the Treasurer's Office would indicate the appropriated Function Code from the 1230 or the 1240 series, or other appropriate series.</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.*

Finding s Citation	Evidence	Evidence of Correction		Must be addressed in CAP
		Required Actions	Date Due	
300.202	Piqua City Schools did not budget or expended FY13 Part B funds for capital outlay/instruction. The district provided a copy of the Board-adopted procurement policy that it follows in its purchasing process. The materials are used for the purposes of meeting the needs of the identified special education students.	<u>Individual Correction</u> None  <u>Systemic Correction</u> None		<input checked="" type="checkbox"/> No

**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.*

Finding s Citation	Evidence	Evidence of Correction		Must be addressed in CAP
		Required Actions	Date Due	
300.202	<p>Piqua City Schools provided a copy of its Purchasing Policy, Inventory Policy and Disposal Policy. The district demonstrated that the policies are being followed.</p> <p>The district staff provided a copy of its Part B IDEA Inventory List. The total asset value detailed in the inventory report was \$568,587.05. The Inventory List was comprehensive and accurate, however one required item of detail was not included – that of the condition or status of each item. Of the 661 items on the inventory list, 114 items were traced to their designated location. The inventory list was accurate.</p> <p>The district follows its policy to review the inventory list each year and in the removal of items on the inventory list.</p> <p>The district demonstrated its conscientious effort to maintain detailed records of its inventory and to responsibly oversee items purchased with public funds.</p>	<u>Individual Correction</u> None  <u>Systemic Correction</u> None  <u>Recommendation:</u> It is recommended that Piqua City School's staff responsible for maintenance of the district inventory, including IT staff, building principals and treasurer, amend the inventory list to include the condition of items held in inventory.		<input checked="" type="checkbox"/> No

**Component 6: Non-Public Count and Proportionate Share**

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

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

Findings Citation	Evidence	Evidence of Correction		Must be addressed in CAP
		Required Actions	Date Due	
300.130 through 300.144	<p>Piqua City Schools' Director of Special Education provided information detailing the child find referrals with the non-public school and community. The information was complete with dates and determinations.</p> <p>Information was also provided demonstrating its timely and meaningful consultation with the non-public schools.</p> <p>Funds are used in non-public schools to meet the needs of the identified special education students parentally placed into the non-public schools.</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 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>Piqua City Schools did not provide for the opportunity for public participation in the planning for the use of Part B funds per 34 CFR Part 300.165.</p> <p>The district was provided guidance in the process of announcing and providing the opportunity for public participation.</p>	<p><u>Individual Correction</u></p> <p>Prior to June 30, 2013, Piqua City Schools' administration is to announce and offer the opportunity for the general public to share in the planning for the use of the FY14 Part B funds.</p> <p><u>Systemic Correction</u></p> <p>Piqua City School must provide documentation of the process it will adopt to assure that it is in compliance with 34 CFR 300.165.</p>	Prior to June 30, 2013	<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	Piqua City Schools did not budget funds for the purpose of reduction of local expenditures or for Comprehensive Early Intervening Services in FY13. There was no information to review in this section.	<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	
<b>Section 267.30.50, Am. Sub. HB 153</b>	OEC reviewed the district budget account summary related to gifted education. OEC also reviewed GIS the salary and benefits printout from the district and the contract for services for the gifted coordinator and GIS from the ESC in place at the 2009 level of ESC unit funding. The district maintenance of effort expenditures are equal to or more than the amount required for 2012-13. The district was not compliant with this requirement in 2011-12. OEC reviewed a vendor expenditures report for NWEA MAP whole-grade testing which fulfilled district requirements for identification expenditures.	<u>Individual Correction</u>  None  <u>Systemic Correction</u>  None	<input checked="" type="checkbox"/> Na

**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	
<b>ORC 3324.04(B)(2)</b>	The district provided evidence that whole grade-screening is in place in 2 <sup>nd</sup> and 5 <sup>th</sup> grades as a provision to ensure inclusion in screening and assessment procedures for minority and disadvantaged students, children with disabilities and children for whom English is a second language.	<u>Individual Correction</u>  None  <u>Systemic Correction</u>  None	<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	
<b>OAC 3301-51-15(D)(4)</b>	WEPs for ten students were provided and reviewed. The reporting verification page was not complete for more than 30% of the WEPs.	<u>Individual Correction</u> None  <u>Systemic Correction</u> The district must provide evidence that all WEPs include documentation for the following: <ul style="list-style-type: none"> <li>• Methods for evaluating student progress toward goals</li> <li>• Method and schedule for reporting to parents on student progress</li> <li>• Staff responsible for ensuring delivery of each service</li> <li>• Deadline for next review</li> <li>• Copy of WEP provided to parents and staff responsible for providing service</li> </ul> OEC will contact the district for submission of new records and review these records for evidence that the district is in compliance.	<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	
<b>ORC 3324.06(D)</b>	Each gifted service offered in the district is available to all eligible students in each building in the district at that grade level. In 2011-12 there was a reporting issue for served students in EMIS. The coordinator attested that this issue has been resolved.	<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	
<b>ORC 3324.10</b>	WAPs were provided for whole grade acceleration and subject acceleration from the year 2007. No evidence was provided that the district uses the <i>Iowa Acceleration Scale, 3<sup>rd</sup> Edition</i> . The acceleration information on the district website is outdated and does not outline clear procedures for staff or parents to refer students for evaluation for acceleration. The district is in the process of revising their acceleration policy through NEOLA.	<u>Individual Correction</u>  None  <u>Systemic Correction</u> The district must create and implement a plan to provide information to staff and parents about the opportunity and procedures to refer students for evaluation for possible acceleration. The district must verify the use of the <i>Iowa Acceleration Scale, 3<sup>rd</sup> Edition</i> .	<input checked="" type="checkbox"/> Yes

**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	
<b>OAC 3301-51-15(E)(2)</b>	The gifted intervention specialists' schedules were reviewed. The GISs do not spend at least 75% of the time providing instruction directly to gifted students and the remainder of the time on other duties related to gifted education. The district has been aware of the issue and has been in the process of revising the schedules for 2013-14.	<u>Individual Correction</u>  None  <u>Systemic Correction</u> The district must create and implement a plan to ensure that gifted intervention specialists in the district spend at least 75% of the instructional day directly instructing students	<input checked="" type="checkbox"/> Yes

**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)	Class schedules were reviewed. Not all students receiving service from a gifted intervention specialist receive at least 225(K-5) or 240(6-12) minutes of instruction per week. The district has been aware of the issue and has been in the process of revising the schedules for 2013-14.	<u>Individual Correction</u> None  <u>Systemic Correction</u>  The district must create and implement a plan to ensure that gifted students receiving service from a gifted intervention specialist receive at least 225(K-5) or 240(6-12) minutes of instruction per week.	<input checked="" type="checkbox"/> Yes

**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)	Copies of coordinator and teacher licenses were provided. The gifted coordinator and gifted intervention specialists hold the appropriate licensure or endorsement.	<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 does not report any services by general education teachers so no professional development or support is required.	<u>Individual Correction</u> None  <u>Systemic Correction</u>  None	<input checked="" type="checkbox"/> NA