

<b>Toledo City School District IRN 044909</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 March 4, 5, and 6, 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 4, 5, and 6, 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:

On February 19, 2013, Toledo City School District mailed 3,466 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. Six parents and family members and one State Support Team (SST) Region 1 representative attended the public meeting. Attendees could speak to OEC representatives publicly in the meeting or individually, provide written comments, or both. Six attendees made comments during the public meeting. Written comment forms were available before, during and after the meeting. OEC received two 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 4 and 5, 2013, OEC consultants reviewed 41 records of school age students with disabilities. An OEL&SR consultant, on March 5, 2013, reviewed seven records as part of the Early Childhood Special Education Review. OEC selected records of a variety of children with disabilities from four buildings.

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

## 4. Staff/Administrative Interviews

On March 5 and 6, 2013, OEC consultants held five sessions of interviews with 14 administrators, nine regular education teachers, 11 intervention specialists, seven related services personnel, four school psychologists, and one paraprofessional. 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 Toledo 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: September 5, 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: October 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: May 2, 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@educatioin.ohio.gov](mailto:Connie.Prairie@educatioin.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>Thirteen (13) reevaluation records indicated that the child's reevaluation was not completed within the three year timeline.</p> <p><u>Interviews</u></p> <p>Discussions with the Student Services Director indicated that this issue has been resolved district-wide and that reevaluation time lines are carefully tracked.</p>	<p><u>Individual Correction</u></p> <p>OEC has verified that these students have a current ETR in place, so no additional individual correction is required.</p> <p><u>Systemic Correction</u></p> <p>The district must submit evidence to OEC of written procedures and practices in place regarding child find evaluation process.</p> <p>OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.</p>	<p><input checked="" type="checkbox"/> Yes</p> <p>A Corrective Action Plan is required due to meeting the 30% threshold of non-compliance.</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>Three 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 described a process for collecting targeted interventions data for documentation in the initial ETR.</p>	<p><u>Individual Correction</u></p> <p>OEC has verified that these students have a current IEP in place, so no additional individual correction is required.</p> <p><u>Systemic Correction</u></p> <p>The district must submit evidence to OEC of written procedures and practices in place regarding documentation of intervention and supports provided prior to completion of the initial evaluation team report.</p> <p>OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.</p>	<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>Nine 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>The area of parent involvement had been lacking in the past, but recently has been corrected.</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>

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>Four 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>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>Six 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 evaluations 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>Three school age and one preschool student evaluations did not provide 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>

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>Four 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>District personnel at all levels described an extensive process focused on keeping parents involved in ETR and IEP development at every step.</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>	<input checked="" type="checkbox"/> No The district does <u>not</u> need to address this finding in a Corrective Action Plan.
CF-9	300.306(a)(1)	<p><u>Record Review</u></p> <p>All school age and preschool 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><u>Individual Correction</u></p> <p>None</p> <p><u>Systemic Correction</u></p> <p>None</p>	<input checked="" type="checkbox"/> NA

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
CF-10	300.306(a)(1); 300.305(a); and 3301-51-01 (B)(21)	<p><u>Record Review</u> Nine school age reevaluations did not show evidence that a group of qualified professionals as appropriate to the suspected disability were involved in determining whether the child is a child with a disability.</p> <p><u>Interviews</u> Interview responses made it clear that this area in the evaluation process has recently been addressed for improvement.</p>	<p><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:</p> <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> <p><u>Systemic Correction</u> 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 The district does <u>not</u> need to address this finding in a Corrective Action Plan.</p>

## Component 2: Delivery of Services

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

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
DS-1	300.320(a)(1)(i)	<p><u>Record Review</u></p> <p>Two school age student IEPs did not address how the child's disability affects his/her involvement and progress in the general education curriculum.</p> <p>All preschool student IEPs addressed how the child's disability affects his/her involvement and progress in the general education curriculum.</p>	<p><u>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 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>Five 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>Staff members described an extensive system of data collection and analysis related to defining specific needs in the Present Levels.</p> <p><u>Other Considerations</u></p> <p>Often the Present Levels contained too much irrelevant information that did not relate to a specific annual goal need for the student.</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 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>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-3	300.320 (a)(2)(i)(A)	<u>Record Review</u> All school age and preschool student IEPs contained annual goals that address the child's academic area(s) of need.	<u>Individual Correction</u> None  <u>Systemic Correction</u> None	<input checked="" type="checkbox"/> NA
DS-4	300.320(a)(2)(i) (A)	<u>Record Review</u> Two school age student IEPs 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 teams of the two IEPs identified as noncompliant to review and amend the IEP to include annual goals that address the functional needs that were identified in the IEP or provide evidence that the IEP team, based on the severity of the needs of the child, decided to prioritize addressing the needs.  <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-5	300.320(a)(2)(i)	<u>Record Review</u> Fourteen (14) school age and six preschool student IEPs did not contain measurable annual goals.  <u>Interviews</u> Interviews revealed some misperceptions that annual goals must be based upon language from the academic content standards, rather than on the specific needs of a child as described in the present levels.	<u>Individual Correction</u> The district must reconvene the IEP teams of the 20 IEPs identified as noncompliant to review and amend annual goals to contain the following six critical elements: <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>	<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	
		<p><u>Other Considerations</u> Staff members have recently been attending professional development on IEP requirements and writing measurable annual goals. This training has become a priority for the district.</p>	<p><u>Systemic Correction</u> The district must implement new procedures to ensure that annual goals written subsequent to this report will include the following six critical elements to demonstrate correction:</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>	
DS-6	300.320(a)(4)	<p><u>Record Review</u> Thirteen (13) school age and four 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> Interview responses indicated some lingering confusion between accommodations or instructional delivery styles and actual specially designed instruction based on specific annual IEP goals.</p> <p><u>Other Considerations</u> The district's special education leadership is still working to provide intensive training and technical assistance focused on improving the specially designed instruction in the IEP.</p>	<p><u>Individual Correction</u> The district must reconvene the IEP teams of the 17 IEPs identified as noncompliant to review and amend the specially designed instruction to describe the adaptation of, as appropriate to the needs of the child, the content, methodology, or delivery of instruction.</p> <p><u>Systemic Correction</u> The district must submit evidence to OEC of written procedures and practices in place regarding the IEP process of determining specially designed instruction.</p> <p>OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.</p>	<input checked="" type="checkbox"/> Yes A Corrective Action Plan is required due to meeting the 30% threshold of non-compliance.

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
DS-7	300.320(a)(7)	<u>Record Review</u> Four school age and one preschool student IEPs did not indicate the location where the specially designed instruction will be provided.	<u>Individual Correction</u> The district must reconvene the IEP teams of the five IEPs identified as noncompliant to review and amend the location where the specially designed instruction will be provided.  <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-8	300.320(a)(7)	<u>Record Review</u> Three school age and two preschool student IEPs did not indicate the amount of time and frequency of the specially designed instruction.	<u>Individual Correction</u> The district must reconvene the IEP teams of the five IEPs identified as noncompliant to review and amend the amount of time and frequency of the specially designed instruction.  <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-9	300.320(a)(4)	<u>Record Review</u> Three school age and three preschool student IEPs did not identify related services that address the needs of the child and support the annual goals.	<u>Individual Correction</u> The district must reconvene the IEP teams of the six IEPs identified as noncompliant to review and amend the IEP to include related services that were identified as needed in the IEP.  <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-10	300.320(a)(7)	<u>Record Review</u> All school age student IEPs indicated the location where the related services will be provided.  Two preschool student IEPs did not indicate the location where the related services will be provided.	<u>Individual Correction</u> 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.  <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-11	300.320(a)(7)	<u>Record Review</u> All school age student IEPs indicated the amount of time and frequency of the related services to be provided.  Two preschool student IEPs did not indicate the amount of time and frequency of the related services to be provided.	<u>Individual Correction</u> 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.  <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 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>Two school age and four preschool student IEPs did not identify assistive technology to enable the child to be involved in and make progress in the general education curriculum.</p> <p><u>Interviews</u></p> <p>The need to improve the understanding and proper application of assistive technology for students with disabilities was identified during interview sessions.</p> <p><u>Other Considerations</u></p> <p>Some parents expressed a concern that appropriate assistive technology for students had been identified during IEP discussions but was not made available for their child. Parents also shared their frustrations that district personnel were not given the proper training and technical assistance to use or manage assistive technology for children with disabilities.</p>	<p><u>Individual Correction</u></p> <p>The district must reconvene the IEP teams of the six 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>

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
LRE-2	300.320(a)(6)(i)	<p><u>Record Review</u> Thirteen (13) school age and five 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> Interviews revealed a lingering confusion concerning the difference between accommodations and modifications, and their appropriate use in special education.</p> <p><u>Other Considerations</u> Some parents reported that staff members do not appear to understand specific student needs as an effect of the disability. They urged more training and professional development to help personnel provide better supports and services for their children with disabilities.</p>	<p><u>Individual Correction</u> 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> The district must submit evidence to OEC of written procedures and practices in place regarding accommodations.  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>Eight school age and one preschool student IEPs did not identify modifications to enable the child to be involved in and make progress in the general education curriculum.</p> <p><u>Interviews</u></p> <p>Interviews revealed a lingering confusion concerning the difference between accommodations and modifications, and their appropriate use in special education.</p> <p><u>Other Considerations</u></p> <p>Some parents stressed that specific supports for their children are not provided from year to year or building to building unless they visit the teachers periodically to make sure these supports are in place.</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 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>All school age 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>Four 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>Interviews</u></p> <p>Interview responses revealed a need to improve the description of supports for school personnel in the IEP.</p>	<p><u>Individual Correction</u></p> <p>The district must reconvene the IEP teams of the four IEPs identified as noncompliant to review the supports for school personnel that were identified by the IEP team and define on the IEP the support, who will provide it and when the support will take place.</p> <p><u>Systemic Correction</u></p> <p>The district must submit evidence to OEC of written procedures and practices in place regarding supports for school personnel.</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>Three school age and six 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>The practice of restricting the enrollment of children with disabilities in specific school settings was discussed. In addition, the need to clarify the IEP justification for removal from the regular education setting was identified.</p> <p><u>Other Considerations</u></p> <p>Parents voiced a concern that their children were not served in the least restrictive environment in all circumstances. Sometimes it appeared to be based upon the convenience of the district or the availability of specific student placements.</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 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>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-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"> <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>One school age and two preschool student IEPs did not indicate that the IEP Team included a regular education teacher.</p>	<p><u>Individual Correction</u></p> <p>For the three 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)	<p><u>Record Review</u></p> <p>One school age student IEPs 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"> <li>• Provide documentation that the parent was informed prior to the IEP meeting that the special 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 special education teacher 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> <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.
LRE-9	300.321(4)	<p><u>Record Review</u></p> <p>Two school age student IEPs did not indicate that the IEP Team included an LEA representative.</p> <p>All preschool student IEPs indicated that the IEP Team included an LEA representative.</p>	<p><u>Individual Correction</u></p> <p>For the two 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 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> <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.

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)	<p><u>Record Review</u></p> <p>One school age student IEP did not indicate that the IEP Team included a person qualified to interpret the instructional implications of evaluation results.</p> <p>All preschool student IEPs indicated that the IEP Team included a person qualified to interpret the instructional implications of evaluation results.</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"> <li>• Provide documentation that the parent was informed prior to the IEP meeting that the person qualified to interpret the instructional implications of evaluation results 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 person qualified to interpret the instructional implications of evaluation results 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> <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 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, 20011; 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 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
DV-3	SPP Indicator 20: Accurate and Timely Reporting of Special Education Event Record	<u>Record Review</u> Three school age student records had inaccurate student data reported by the LEA through the Education Management Information System (EMIS), specifically in the following areas: 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 All preschool student records had accurate student data reported by the LEA through the Education Management Information System (EMIS).	<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	
DV-4	SPP Indicator 11 300.301(c)(1)(i)	<u>Record Review</u> The area of initial evaluation timelines was under review in parallel process with the Office for Exceptional Children.	<u>Individual Correction</u> None <u>Systemic Correction</u> None	<input checked="" type="checkbox"/> NA
DV-5	SPP Indicator 12 300.124	<u>Record Review</u> All preschool IEPs 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.	<u>Individual Correction</u> None <u>Systemic Correction</u> None	<input checked="" type="checkbox"/> NA
DV-6 A/B	SPP Indicator 20 for Secondary Transition Plans	<u>Record Review</u> The area of accurate reporting of secondary transition plans was under review in parallel process with the Office for Exceptional Children.	<u>Individual Correction</u> None <u>Systemic Correction</u> None	<input checked="" type="checkbox"/> NA

**Component 5: Discipline**

*Each school district shall ensure that if the child's behavior impedes his or her learning or the learning of others, the IEP team must specifically consider the child's behavioral needs.*

The area of discipline is being reviewed in a parallel process with the Office for Exceptional Children.

**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>Staff from Toledo City Schools’ Office for Management and Budget provided an FY13 Accounting Report (ACCRTP) and Financial Detail Report (FINDET) prior to the site visit.</p> <p>The reports showed that the funds were expended for services for children with disabilities. The amounts documented in the FINDET were in alignment with the FY13 budget in the CCIP.</p> <p>The district to date had utilized approximately 60% of its Fund 516 amounts in Object Code 100 and 200, 94% of its Object Code 400 ,73% of its Object Code 500 , 96% of its Object Code 600 and 73% of its Object Code 800, for a year- to-date use of funds of 68%</p> <p>The FY13 Fund 516 allocation is \$6,803,863,20, with \$252,073.78 in carryover. The budget is consistent with the FY12 budget.</p> <p>The FY13 Early Childhood allocation (Fund 587) is \$205,127.11. The FINDET evidenced appropriate use of the funds. The district to date had utilized approximately 58% of its Fund 587 amounts in Object Code 100 , 72% of its Object Code 200, 93% of its Object Code 400 ,57% of its Object Code 500 , and 73% of its Object Code 800, for a year-to-date use of funds of 65%</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 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 95 staff person being funded though Fund 516 funds providing a wide range of services across the district. An additional 2 staff were funded through Fund 587. 6 staff are split funded, with a portion of their funding being from either Fund 516 or 587. Expenditures were appropriate and in alignment with the budget. Staff types included intervention specialists, program supervisors, clerical staff and 37 one-on-one paraprofessionals.</p> <p>All staff funded with FY13 Part B funds held appropriate licensure.</p>	<p><u>Individual Correction</u> None</p> <p><u>Systemic Correction</u> None</p>		<input checked="" type="checkbox"/> NA
	<p>Although TPS does 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 Ohio Department of Education, Office for Federal Programs requested other clarifying information to be included in Toledo City Schools' Semi-Annual Certification document, and as of the time of this review TPS had not secured those documents for the first half of FY13. The anticipated completion date was March 21. The forms were received on April 16<sup>th</sup>.</p>	<p><u>Individual Correction</u> Subsequent to the site visit, TPS Office for Management and Budget provided a copy of the first half-year semi-annual certification for all staff working under a single cost objective and funded with Part B funds.</p> <p><u>Systemic Correction</u> TPS Treasurer's Office must provide a copy of the second half-year semi-annual certification for all staff working under a single cost objective and funded with Part B funds.  TPS treasurer's Office must provide a copy of the policy and procedures it will follow to assure that semi-annual certifications are required and completed for staff working under a single cost objective and funded with Part B funds.</p> <p>!</p>	<p><b>Completed</b></p> <p><b>May 2, 2014</b></p>	<input checked="" type="checkbox"/> Yes



Findings Citation	Evidence	Evidence of Correction		Must be addressed in CAP
		Required Actions	Date Due	
	Support. Of that number, 2,822 lines of entry were listed for staff compensation. As cited above, it is not possible through this review to determine the accuracy of each of these entries.			

**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>Toledo City Schools budgeted \$75,000.00 for supplies and \$100,000 for Capital Outlay-Equipment</p> <p>From the information provided in the FINDET, Toledo City Schools' treasurer's office was provided a list of 25 vouchers that were to be reviewed from FY13 Fund 516 and three from Fund 587. 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 coding detail in the vouchers was consistent with the information provided in the FINDET.</p> <p>The FINDET identified purchases as General Supplies, Advertising, Professional and Technical Services or Equipment</p>	<p>Individual Correction None</p> <p>Systemic Correction None</p>	<b>NA</b>	<input checked="" type="checkbox"/> NA



**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	<p>Toledo City Schools budgeted \$100,000.00 in FY13 Part B funds for capital outlay.</p> <p>The district Treasurer's Office provided a copy of the district Purchasing Policy and Purchasing Procedures. It was determined that the district is following the adopted Policy and Procedures.</p> <p>The FINDET listed 2 vouchers for the purchase of equipment. The vouchers were complete and accurate with the exception noted above that the function codes clearly were not reflective of the intended use of the two equipment items purchased.</p> <p>The corrections for this section are included in Component 3 above.</p>	<p><u>Individual Correction</u> None</p> <p><u>Systemic Correction</u> None</p>	NA	<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	<p>Toledo City Schools Treasurer's Office provided a copy of its Inventory Policy and Disposal Policy. The policies adequately direct the management of the district property and equipment.</p> <p>District OMB staff related that the district does not have a current, accurate inventory list of items purchased with Part B funds available for review. The district did contract to have each item of district property and equipment inventoried, and that task has been completed. However, the list reflects a master listing of all district items, inconsistently identifies similar items, and does not identify the necessary fund detail of the items. It was determined that a review of the inventory list and verification of its accuracy could not be done at the time of the review.</p> <p>The district staff also provided a copy of the board adopted Disposal Policy. Implementation of that policy will be determined upon later review of the district inventory.</p>	<p><u>Individual Correction</u></p> <p>TPS must follow its Inventory Policy as it currently adopted for all purchases with Part B funds from this time forward. Items purchased with Part B funds must be in compliance with Board Policy.</p> <p>Toledo Public Schools is in the process of validating its inventory list. The final inventory list must list all required components to meet IDEA requirements, including the date of the purchase, the fund source, item description, expenditure amount, item location and current condition. Upon completion, a copy of the list will be made available to OEC. This correction will also necessitate a return to Toledo City Schools to review the list for completion and accuracy.</p> <p><u>Systemic Correction</u></p> <p>Toledo City Schools has an inventory policy in place. Toledo City School Treasurer must define the process it will use to assure that the adopted board policy will be followed and provide a copy of that guidance to OEC.</p>	July 15, 2013	<input checked="" type="checkbox"/> No



Findings Citation	Evidence	Evidence of Correction		Must be addressed in CAP
		Required Actions	Date Due	
	The district is to annually maintain documentation of timely and meaningful communication with the administration of the non-public schools being served in the district. That communication will include a description of the services to be provided and the proportionate share of the Part B funds to be utilized in providing those services, as well as the requirement of the accurate completion of the NS3 report.	<u>Individual Correction</u> Toledo Public Schools Director of Student Services must provide documentation of consultation with private school administration.  <u>Systemic Correction</u> Toledo Public Schools Director of Student Services must provide a plan it will use to assure that consultation with private school administrators occurs annually and include guidance to private schools regarding the accuracy and completion of the NS3 reporting.	<b>July 15, 2013</b>  <b>July 15, 2013</b>	<input checked="" type="checkbox"/> Yes
	The district is to work with its staff to provide direction regarding the services that are or are not to be provided in the non-public schools to children whose family receives the Autism Scholarship or the Jon Peterson Scholarship.	<u>Individual Correction</u> Toledo Public Schools Director of Student Services must review current IEPs for students participating in the Autism Scholarship Program or Jon Peterson Scholarship Program being served in a private school receiving in Part B services to identify the services that their assigned staff may provide.  <u>Systemic Correction</u> Toledo Public Schools Director of Student Services must provide a copy of the system the district will follow to align private school services with defined IEP services.	<b>July 15, 2013</b>  <b>July 15, 2013</b>	<input checked="" type="checkbox"/> Yes
	TPS will ensure that the NS3 Non-Public "eligible" count is maintained and will include all students on the Autism Scholarship or the Jon Peterson Scholarship.	<u>Requested documentation:</u> The district will provide a copy of its current announcement of its child-find activities to the general public.	<b>July 15, 2013</b>	

**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	Toledo City Schools provided copies of information made available through the media of notification of opportunity public participation and comment in the use of IDEA funds. The announcements were clear and detailed and in general met the intent of 34 CFR 300.165.	<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	<p>Due to significant disproportionality in discipline rates, Toledo City Schools was required to redirect 15% of its FY13 Part B allocation for Coordinated Early Intervening Services for at-risk students.</p> <p>The amount of funds required for CEIS is \$1,051,348.55.</p> <p>Based upon data evidenced in the FINDET and ACCRPT and in discussion with the Director of Student Services, it was determined that the initial plan and current activities for implementing CEIS did not meet the program requirements. As such, early intervening services has not been completed. TPS indicated that it would continue to provide the one-on-one paraprofessional services (as described in Component 2 above), but it would now also implement an additional service that would be in compliance with the CEIS requirements.</p> <p>The Director of Student Services has indicated that the new CEIS activities have been developed and are being implemented in the district per IDEA requirements, and the planned use of funds for mandatory CEIS is on track.</p>	<p><u>Individual Correction</u></p> <p>None</p> <p><u>Systemic Correction</u></p> <p>None</p> <p><b>Action Steps:</b></p> <ol style="list-style-type: none"> <li>1. TPS will provide a summary of its planned CEIS activities and disclose its plan to utilize the redirected amount by June 30, 2013.</li> <li>2. TPS will review detail in the CCIP redirection page to validate CEIS expenses and the number of students receiving CEIS services.</li> <li>3. TPS will review its CEIS activities for FY12 to verify number of students served and number of students later identified as a SWD.</li> <li>4. TPS will document the count of students served in 2012-13 and then the number later determined to be a SWD in preparation for completing the Part B- IDEA Budget Detail and Redirection Page.</li> <li>5. TPS will assure that the funds expended for CEIS are identifiable in the district financial records, and can be reported in a FINDET.</li> </ol>	<p><b>May 30, 2013</b></p>	<p><input checked="" type="checkbox"/> No</p>

**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>	The district is not meeting the requirement related to Part A above. In FY09, the district received \$365,094.17 in state gifted unit funds. The district has not met the requirement to spend for services to identified gifted students at least the same amount of state funding that it received in fiscal year 2009 through unit funding. In addition, the district is not meeting the requirement related to Part C above. In FY09, the district received \$76,852.57 in state supplemental identification funds. The district has not met the requirement to spend for gifted identification no less than the amount they received in state supplemental identification funding in fiscal year 2009.	<u>Individual Correction</u>  None  <u>Systemic Correction</u>  The district must describe in the corrective action plan the process to become compliant with the Part A and Part C requirements. The plan must address how the Part A and Part C requirements will be implemented beginning with the 2013-2014 school year.	<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	
<b>ORC 3324.04(B)(2)</b>	OEC reviewed identification procedures. OEC reviewed a written statement from the district explaining how the district meets the assurances. The district conducts whole grade screening at grade levels K-8. Evidence was provided to document the district is meeting this requirement.	<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	
OAC 3301-51-15(D)(4)	The district is currently not providing gifted services.	<u>Individual Correction</u> None  <u>Systemic Correction</u> None	<input checked="" type="checkbox"/> NA

### 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)	The district is currently not providing gifted services.	<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>	OEC reviewed district acceleration policies and procedures. OEC reviewed acceleration information available on the district website. It is not clear from the information provided if all staff are informed about the acceleration process. It is not clear from the information provided if the district uses the Iowa Acceleration Scale, 3 <sup>rd</sup> Edition, to evaluate for early entrance and whole grade acceleration. The procedures and evaluation process in Board Policy JEB-R (Early Entrance Screening) do not match the district's Model Acceleration Policy for Advanced Learners.	<u>Individual Correction</u> None  <u>Systemic Correction</u> <p>The district must clarify in the corrective action plan the process for informing all staff about the acceleration process.</p> <p>The district must clarify in the corrective action plan the process for implementing the use of the Iowa Acceleration Scale, 3<sup>rd</sup> Edition, to evaluate for early entrance and whole grade acceleration.</p> <p>The district must clarify in the corrective action plan the process for amending the procedures and evaluation process in Board Policy JEB-R (Early Entrance Screening) to match the district's Model Acceleration Policy for Advanced Learners.</p> <p>OEC will contact the district for submission of new records and review these records for evidence that the district is in compliance.</p>	<input checked="" type="checkbox"/> Yes

### Component 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 district is currently not providing gifted services.	<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 is currently not providing gifted services.	<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)	The district is currently not providing gifted services.	<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 is currently not providing gifted services.	<u>Individual Correction</u> None  <u>Systemic Correction</u> None	<input checked="" type="checkbox"/> NA