

Vinton County Local School District IRN 050393

**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 February 26-28, 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 February 26-28, 2013. During the IDEA Review, OEC consultants monitor the LEA's implementation of IDEA to ensure compliance. The primary focus of the IDEA Review is to:

- Improve educational results and functional outcomes for all children with disabilities; and
- Ensure that LEAs meet program requirements under Part B of IDEA, particularly those requirements that are most closely related to improving educational results for children with disabilities.

OEC focused the review on the following areas:

- Child Find;
- Delivery of Services;
- Least Restrictive Environment;
- Data Verification

Data Sources

During the review, OEC considered information from the following sources:

1. Public Parent Meeting, Individual Parent Meetings and Written Comments

During the week of February 6, 2013, Vinton County Local School District mailed 399 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 26, 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, one representative from the local press and one State Support Team (SST) Region 16 representative attended the public meeting. Attendees could speak to OEC representatives publicly in the meeting or individually, provide written comments, or both. All 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 26-27, OEC consultants reviewed 31 records of school age students with disabilities. An OEL&SR consultant, on February 27, 2013, reviewed six records as part of the Early Childhood Special Education Review. OEC selected records of a variety of children with disabilities from five buildings.

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

4. Staff/Administrative Interviews

On February 27-28, 2013, OEC consultants held four sessions of interviews with six administrators and 26 teachers, school counselors, related services personnel and school psychologists. OEC interviews focused on the following review areas: Child Find; Delivery of Services; Least Restrictive Environment (LRE) and IEP alignment; and Discipline.

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 Vinton County Local School District. An approved form for the corrective action plan will be provided by OEC or can be accessed on ODE's web site by using the keyword search "OEC Corrective Action Plan". The corrective action plan developed by the district must include the following:

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

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

The district must submit the corrective action plan to Stephanie Falor, OEC Lead Consultant at Stephanie.Falor@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 13, 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 21, 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:** Stephanie Falor, OEC Lead Consultant, at (614) 387-2236, toll-free at (877) 644-6338, or by e-mail at Stephanie.Falor@education.ohio.gov
- **Special Education Early Childhood:** Connie Prairie, Educational Consultant, at (614) 995-9934 toll-free at (877) 644-6338, or by e-mail at Connie.Prairie@education.ohio.gov
- **Fiscal:** Earl Focht, Educational Consultant, at (614) 387-0940, toll-free at (877) 644-6338, or by e-mail at Earl.Focht@education.ohio.gov.
- **Gifted Education:** Michael Demczyk, Educational Consultant, at (614) 995-3354, toll-free at (877) 644-6338, or by e-mail at Michael.Demczyk@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>Two school age reevaluation records indicated that the child's reevaluation was not completed within the three year timeline.</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>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>
CF-3	OAC 3301-51-06 (2) and OAC 3301-51-06(4)	<p><u>Record Review</u></p> <p>All school age and preschool student initial evaluations appropriately documented interventions provided to resolve concerns for the child performing below grade-level standards.</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-4	300.501(b)(1)	<p><u>Record Review</u> Six school age student records did not show evidence that the evaluation planning team included the parent. All preschool student records showed evidence that the evaluation planning team included the parent.</p> <p><u>Interviews</u> During the staff and administrator interviews various methods and opportunities for parent involvement was discussed. Staff agreed that more effort needed to go into documenting parental contacts.</p>	<p><u>Individual Correction</u> The district must provide evidence that the parent was involved or provided the opportunity to participate (three documented attempts) in the evaluation planning process. The evidence may include; evaluation planning form, prior written notice, parent invitation, referral form or communication log. 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> 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-5	300.305(a)(1)	<p><u>Record Review</u> All school age and preschool student evaluations provided evidence that the evaluation planning team reviewed existing data on the child.</p>	<p><u>Individual Correction</u> None</p> <p><u>Systemic Correction</u> None</p>	<input checked="" type="checkbox"/> NA
CF-6	300.305(a)(2)	<p><u>Record Review</u> All school age and preschool student evaluations provided evidence that the evaluation planning team identified what additional data, if any, were needed.</p>	<p><u>Individual Correction</u> None</p> <p><u>Systemic Correction</u> 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-7	300.304(c)(4); OAC 3301-51-01; and OAC 3301-51-06	<u>Record Review</u> All school age and preschool student evaluations provided evidence that the evaluation addresses all areas related to the suspected disability.	<u>Individual Correction</u> None <u>Systemic Correction</u> None	<input checked="" type="checkbox"/> NA
CF-8	300.306(a)(1)	<u>Record Review</u> 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. All preschool student records showed evidence that the parent of the child was involved in determining whether the child is a child with a disability.	<u>Individual Correction</u> 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. <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.
CF-9	300.306(a)(1)	<u>Record Review</u> All school age and preschool student initial evaluations showed evidence that a group of qualified professionals as appropriate to the suspected disability were involved in determining whether the child is a child with a disability.	<u>Individual Correction</u> None <u>Systemic Correction</u> None	<input checked="" type="checkbox"/> NA

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)	<u>Record Review</u> One school age reevaluation 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>Individual Correction</u> The district must provide evidence that the IEP team and other qualified professionals participated in the eligibility determination. If not, the IEP team must reconvene the ETR meeting and provide OEC evidence of group participation. IEP Team Members include, but are not limited to: <ol style="list-style-type: none"> 1. Parent 2. Regular Education Teacher 3. Special Education Provider 4. District Representative 5. An individual who can interpret the instructional implications of evaluation results, 6. At the discretion of the parent or school district, other individuals who have knowledge or special expertise regarding the child, including related services personnel as appropriate; 7. Whenever appropriate, the child with a disability. <u>Systemic Correction</u> OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.	<input checked="" type="checkbox"/> No The district does <u>not</u> need to address this finding in a Corrective Action Plan.

Component 2: Delivery of Services

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

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
DS-1	300.320(a)(1)(i)	<p><u>Record Review</u></p> <p>All school age 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>None</p> <p><u>Systemic Correction</u></p> <p>None</p>	<input checked="" type="checkbox"/> NA
DS-2	300.320(a)(1)	<p><u>Record Review</u></p> <p>Eight school age student IEPs did not contain Present Levels of Academic Achievement and Functional Performance (PLOP) that addressed the needs of the student.</p> <p>All preschool student IEPs contained Present Levels of Academic Achievement and Functional Performance (PLOP) that addressed the needs of the student.</p> <p><u>Interviews</u></p> <p>Staff discussed that the language found in the ETR does not need to be replicated exactly in the PLOP; current, relevant data should be documented in this area.</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"> • A summary of current daily academic/behavior and/or functional performance (strengths and needs); • Baseline data provided for developing a measurable goal. <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.
DS-3	300.320 (a)(2)(i)(A)	<p><u>Record Review</u></p> <p>All school age and preschool student IEPs contained annual goals that address the child's academic area(s) of need.</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	
DS-4	300.320(a)(2)(i) (A)	<p><u>Record Review</u></p> <p>One school age student IEP did not contain annual goals that address the child's functional area(s) of need.</p> <p>All preschool student IEPs contained annual goals that address the child's functional area(s) of need.</p>	<p><u>Individual Correction</u></p> <p>The district must reconvene the IEP team of the one IEP identified as noncompliant to review and amend the IEP to include annual goals that address the functional needs that were identified in the IEP or provide evidence that the IEP team, based on the severity of the needs of the child, decided to prioritize addressing the needs</p> <p><u>Systemic Correction</u></p> <p>OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.</p>	<input checked="" type="checkbox"/> No <p>The district does <u>not</u> need to address this finding in a Corrective Action Plan.</p>
DS-5	300.320(a)(2)(i)	<p><u>Record Review</u></p> <p>Eight school age and five preschool student IEPs did not contain measurable annual goals.</p>	<p><u>Individual Correction</u></p> <p>The district must reconvene the IEP teams of the thirteen (13) IEPs identified as noncompliant to review and amend annual goals to contain the following six critical elements:</p> <ol style="list-style-type: none"> 1. Who? 2. Will Do What? 3. To What Level or Degree? 4. Under What Conditions? 5. In What Length of Time? 6. How Will Progress Be Measured? <p><u>Systemic Correction</u></p> <p>The district must implement new procedures to ensure that annual goals written subsequent to this report will include the following six critical elements to demonstrate correction:</p> <ol style="list-style-type: none"> 1. Who? 2. Will Do What? 3. To What Level or Degree? 4. Under What Conditions? 5. In What Length of Time? 6. How Will Progress Be Measured? <p>OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.</p>	<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 six preschool student IEPs did not contain a statement of specially designed instruction that addresses the needs of the child and supports annual goals.</p> <p><u>Interviews</u></p> <p>Teachers were able to articulate various methods and approaches by which specially designed instruction is implemented; all agreed that they can improve how they document the supports and services that they are providing.</p>	<p><u>Individual Correction</u></p> <p>The district must reconvene the IEP teams of the 14 IEPs identified as noncompliant to review and amend the specially designed instruction to describe the adaptation of, as appropriate to the needs of the child, the content, methodology, or delivery of instruction.</p> <p><u>Systemic Correction</u></p> <p>The district must submit evidence to OEC of written procedures and practices in place regarding the IEP process of determining specially designed instruction.</p> <p>OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.</p>	<p><input checked="" type="checkbox"/> Yes</p> <p>A Corrective Action Plan is required due to meeting the 30% threshold of non-compliance.</p>
DS-7	300.320(a)(7)	<p><u>Record Review</u></p> <p>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 ten 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>

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
DS-8	300.320(a)(7)	<p><u>Record Review</u></p> <p>Ten 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 ten 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>	<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)	<p><u>Record Review</u></p> <p>All school age and preschool student IEPs identified related services that address the needs of the child and support the annual goals.</p>	<p><u>Individual Correction</u></p> <p>None</p> <p><u>Systemic Correction</u></p> <p>None</p>	<input checked="" type="checkbox"/> NA
DS-10	300.320(a)(7)	<p><u>Record Review</u></p> <p>One school age student IEP did not indicate the location where the related services will be provided.</p> <p>All preschool student IEPs indicated the location where the related services will be provided.</p>	<p><u>Individual Correction</u></p> <p>The district must reconvene the IEP team of the one IEP 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>	<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-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 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>All preschool student IEPs identified assistive technology to enable the child to be involved in and make progress in the general education curriculum.</p>	<p><u>Individual Correction</u></p> <p>The district must reconvene the IEP team of the one IEP 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>OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.</p>	<p><input checked="" type="checkbox"/> No</p> <p>The district does <u>not</u> need to address this finding in a Corrective Action Plan.</p>
LRE-2	300.320(a)(6)(i)	<p><u>Record Review</u></p> <p>One school age student IEP did not identify accommodations provided to enable the child to be involved in and make progress in the general education curriculum.</p> <p>All preschool student IEPs identified accommodations provided to enable the child to be involved in and make progress in the general education curriculum.</p>	<p><u>Individual Correction</u></p> <p>The district must reconvene the IEP team of the one IEP 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>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-3	300.320(a)(4)	<p><u>Record Review</u></p> <p>One school age student IEP did not identify modifications to enable the child to be involved in and make progress in the general education curriculum.</p> <p>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>Individual Correction</u></p> <p>The district must reconvene the IEP team of the one IEP identified as noncompliant to review the modifications that would alter the amount or complexity of materials or the performance expected of the child from grade level curriculum expectations and include them on the IEP.</p> <p><u>Systemic Correction</u></p> <p>OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.</p>	<p><input checked="" type="checkbox"/> No</p> <p>The district does <u>not</u> need to address this finding in a Corrective Action Plan.</p>
LRE-4	300.320(a)(4)	<p><u>Record Review</u></p> <p>Two school age student IEPs did not identify supports for school personnel to enable the child to be involved in and make progress in the general education curriculum.</p> <p>All preschool student IEPs identified supports for school personnel to enable the child to be involved in and make progress in the general education curriculum.</p>	<p><u>Individual Correction</u></p> <p>The district must reconvene the IEP teams of the two 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>	<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-5	300.320(a)(5)	<p><u>Record Review</u></p> <p>Three school age 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>All preschool student IEPs included an explanation of the extent to which the child will not participate with nondisabled children in the regular education classroom.</p>	<p><u>Individual Correction</u></p> <p>The district must reconvene the IEP teams of the three IEPs identified as noncompliant to review and include a justification for why the child was removed from the regular education classroom.</p> <p>The justification should:</p> <ul style="list-style-type: none"> • Be based on the needs of the child, not the disability. • Reflect that the team has given adequate consideration to meeting the student's needs in the regular classroom with supplementary aids and services. • Document that the nature or severity of the disability is such that education in regular education classes, even with the use of supplementary aids and services, cannot be achieved satisfactorily. • Describe potential harmful effects to the child or others, if applicable. <p><u>Systemic Correction</u></p> <p>OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.</p>	<p><input checked="" type="checkbox"/> No</p> <p>The district does <u>not</u> need to address this finding in a Corrective Action Plan.</p>
LRE-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>Individual Correction</u></p> <p>For the seven IEPs identified as noncompliant, the district must:</p> <ul style="list-style-type: none"> • Provide evidence of parent participation at the IEP meeting, or • Provide documentation of at least three attempts made by the district to ensure parent participation, or • Reconvene the IEP team to review the IEP with the parent. <p><u>Systemic Correction</u></p> <p>OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.</p>	<p><input checked="" type="checkbox"/> No</p> <p>The district does <u>not</u> need to address this finding in a Corrective Action Plan.</p>

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
LRE-7	300.321(2)	<u>Record Review</u> All school age and preschool student IEPs indicated that the IEP Team included a regular education teacher.	<u>Individual Correction</u> None <u>Systemic Correction</u> None	<input checked="" type="checkbox"/> NA
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> All school age and preschool student IEPs indicated that the IEP Team included an LEA representative.	<u>Individual Correction</u> None <u>Systemic Correction</u> None	<input checked="" type="checkbox"/> NA
LRE-10	300.321(5)	<u>Record Review</u> All school age and preschool student IEPs indicated that the IEP Team included a person qualified to interpret the instructional implications of evaluation results.	<u>Individual Correction</u> None <u>Systemic Correction</u> None	<input checked="" type="checkbox"/> NA

Component 4: Data Verification

Each school district shall report timely and accurate special education event records for students with disabilities; have in effect an Individualized Education program for each child with a disability with the LEA's jurisdiction and in place on or before Dec. 1, 2011; conduct initial evaluations within 60 days of receiving parental consent for evaluation; have an IEP in place for three-year olds transitioning from Early Intervention Programs on or before the child's third birthday; and have a secondary transition place in place that meets all required elements for IDEA.

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
DV-1	300.645 R.C. 3301.07.14	<u>Record Review</u> All school age and preschool student IEPs indicated that the child had an IEP in effect as reported on the LEA's December 1, 2011 Child Count Report.	<u>Individual Correction</u> None <u>Systemic Correction</u> None	<input checked="" type="checkbox"/> NA
DV-2	300.645 R.C. 3301.07.14	<u>Record Review</u> All school age and preschool student ETRs indicated that the child had an ETR in effect as reported on the LEA's December 1, 2011 Child Count Report.	<u>Individual Correction</u> None <u>Systemic Correction</u> None	<input checked="" type="checkbox"/> NA
DV-3	SPP Indicator 20: Accurate and Timely Reporting of Special Education Event Record	<u>Record Review</u> All school age and preschool student records had accurate student data reported by the LEA through the Education Management Information System (EMIS) Report, specifically in the following area(s): a) DOB b) IEP date (IIEP, RIEP, TIEP, CIEP, or FIEP events) c) ETR dates (IETR, RETR, TETR) d) Referral date e) Consent date f) Disability category as indicated as an outcome of ETR g) Admission date h) Withdrawal date i) Non-compliance reason for ETR or IEP date	<u>Individual Correction</u> None <u>Systemic Correction</u> None	<input checked="" type="checkbox"/> NA

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
DV-4	SPP Indicator 11 300.301(c)(1)(i)	<u>Record Review</u> All school age and preschool student initial evaluations reported as being conducted within 60 days of the district receiving parental consent for the evaluation was conducted within the required timeline.	<u>Individual Correction</u> None <u>Systemic Correction</u> None	<input checked="" type="checkbox"/> NA
DV-5	SPP Indicator 12 300.124	<u>Record Review</u> All preschool IEPs showed evidence that an IEP was in place for 3 year olds transitioning from Early Intervention Programs (0-3 years) on or before the child's third birthday.	<u>Individual Correction</u> None <u>Systemic Correction</u> None	<input checked="" type="checkbox"/> NA
DV-6 A/B	SPP Indicator 20 for Secondary Transition Plans	<u>Record Review</u> One school age IEP did not show evidence that the secondary transition plan reported in EMIS during 2010-2011 was in place that meets all 8 required elements of IDEA for the student, specifically in the following area(s): 1. There are appropriate measurable postsecondary goal(s). 2. The postsecondary goals are updated annually. 3. The postsecondary goals were based on age appropriate transition assessment. 4. There are transition services that will reasonably enable the student to meet the postsecondary goal(s). 5. The transition services include courses of study that will reasonably enable the student to meet the postsecondary goal(s). 6. The annual goal(s) are related to the student's transition service needs. 7. There is evidence the student was invited to the IEP Team Meeting where transition services were discussed. 8. When appropriate, there is evidence that a representative of any participating agency was invited to the IEP Team Meeting.	<u>Individual Correction</u> One current IEP did not contain transition plan that meet all 8 required elements of IDEA. The district must reconvene the IEP team to review and correct the secondary transition plan for the one record identified as still noncompliant or provide documentation of the student's withdrawal date. <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.

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	The district's FER for FY12 516 and 587 funds was submitted and approved by the Office of Grants Management. The financial detail report (FINDET) was provided and the majority of the funds were expended on salaries and fringe benefits. Dollars were budgeted in the 400's, 500's and 600's but only a small amount was expended on purchase services and supplies and no expenditures on capital outlay. The special education director indicated that dollars were budgeted in those categories as a holding place for future purchases or for carryover purposes.	<u>Individual Correction</u> None <u>Systemic Correction</u> None		<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	The district provided an accounting report (ACCRPT) for the 27 employees being paid out of 516 and 587 IDEA funds. All staff members were properly certified with semi-annual certifications. Position descriptions were provided for all funded staff and expenses were properly coded to the correct function and object code. There were 31 students who were paid out of 516 IDEA funds for their IEP work-study program. According to the special education director, students are paid \$3.00 an hour for their services around the school-cafeteria and custodial duties. OEC continues to research this practice to determine whether this is an allowable expense from IDEA 516 funds.	<u>Individual Correction</u> The district will receive further information on specific corrections required, if any, in a separate communication. <u>Systemic Correction</u> The district will receive further information on specific corrections required, if any, in a separate communication.		<input checked="" type="checkbox"/> Yes

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	Seven vouchers were reviewed for expenditures from 400's and 500's. The fiscal coding was appropriate and the funds were charged to the proper funds, function and object codes.	<u>Individual Correction</u> None <u>Systemic Correction</u> None		<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	There were no expenditures for Capital Outlay as of the date of the review. The district provided the BOE procurement policy.	<u>Individual Correction</u> None <u>Systemic Correction</u> None		<input checked="" type="checkbox"/> NA

Component 5: Equipment inventory policy and procedures

The district/school retains control and administration of FY13 516 and 587 funds used to purchase materials, equipment and property (i.e.bus) purchased with those funds for the uses and purposes provided in the IDEA. The district is properly identifying equipment purchased with IDEA funds and is complying with Board Policy in cataloguing and inventorying the equipment. The district master list of equipment purchased with IDEA funds was updated within the last two years; the district has an equipment disposal policy; the district requested disposition instructions from ODE prior to disposing of assets with at fair market value of more than \$5,000.00, and sale proceeds were deposited back into the original grant.

Findings Citation	Evidence	Evidence of Correction		Must be addressed in CAP
		Required Actions	Date Due	
300.202	<p>The inventory list provided by the treasurer’s office documented that equipment was properly tagged and contained the pertinent regulatory information.</p> <p>While performing building on-site visits to verify equipment was tagged, it was noticed that numerous pieces of equipment purchased with 516 IDEA funds were tagged by the district, but not on the inventory list. This was substantiated by the special education director.</p>	<p><u>Individual Correction</u></p> <p>None</p> <p><u>Systemic Correction</u></p> <p>The district needs to review and update their district’s inventory list to match the equipment purchased with IDEA 516 funds.</p>		<input checked="" type="checkbox"/> Yes

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	There are no non-public schools being served by the district.	<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	The district did not have documentation that they provided public notice and conduct public hearings per 34 CFR Part 300.165:	<u>Individual Correction</u> None <u>Systemic Correction</u> Documentation needs to be provided for the following: In accordance with 34 CFR 300.165, the district/school must provide 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.		<input checked="" type="checkbox"/> Yes

Component 8: Redirection of funds

If the district/school has redirected funds for CEIS, it is able to document the expenditures related to CEIS and to validate that the percent of the IDEA funds used for 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	The district is choosing not to use FY13 IDEA funds for CEIS.	<u>Individual Correction</u> None <u>Systemic Correction</u> None		<input checked="" type="checkbox"/> NA

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

Component 1: Gifted Budget

- A. Based on Section 267.30.50 in Am. Sub. HB 153, did the district spend for services to identified gifted students at least the same amount of state funding that it received in fiscal year 2009 through unit funding?
- B. If the district in fiscal year 2009 received gifted student services from an ESC, and the ESC received gifted unit funding in fiscal year 2009, did the district either (a) obtain gifted student services from an ESC that are comparable to the gifted student services provided to the district with gifted unit funding in fiscal year 2009 by an ESC or (b) spend for services to identified gifted students an amount not less than the amount of gifted unit funding expended by an ESC in fiscal year 2009 for the district's students?
- C. Did the district spend no less than their FY09 supplemental identification amount on gifted identification?

Citation	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
		Required Actions	
Section 267.30.50, Am. Sub. HB 153	OEC reviewed district spending related to gifted education. OEC reviewed budget summaries and expenditure reports. Evidence was provided to demonstrate that the district is meeting this requirement.	<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	
ORC 3324.04(B)(2)	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-12. 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)	Ten WEPs were selected for review. WEPs included all of the required elements.	<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)	Each gifted service offered in the district is available to all eligible students in each building in the district at that grade level. Services are available to all eligible students.	<u>Individual Correction</u> None <u>Systemic Correction</u> None	<input checked="" type="checkbox"/> NA

Component 5: Acceleration and Attestation

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

Citation	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
		Required Actions	
ORC 3324.10	OEC reviewed district acceleration policies and procedures. It is not clear from the information provided if all accelerated students have a Written Acceleration Plan (WAP). It is not clear from the information provided if all staff are informed about the acceleration process. The district's Acceleration Policy does not include a statement that the district will use an ODE-approved process for early entrance and whole grade acceleration. The district's Early Graduation Policy, as it applies to advanced learners, does not include an appeal process.	<p><u>Individual Correction</u></p> <p>The district must submit Written Acceleration Plans (WAPs) for any students currently accelerated.</p> <p><u>Systemic Correction</u></p> <p>The district must clarify in the corrective action plan the process for determining whether or not all accelerated students have a Written Acceleration Plan (WAP).</p> <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 timeline for amending its Acceleration Policy to include a statement that the district will use an ODE-approved process for early entrance and whole grade acceleration.</p> <p>The district must clarify in the corrective action plan the timeline for amending its Early Graduation Policy, as it applies to advanced learners, to include an appeal process.</p> <p>OEC will contact the district for submission of new WAPs and review these WAPs 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	
OAC 3301-51-15(E)(2)	OEC reviewed GIS teaching schedules. Documentation was provided that verified district compliance. All requirements regarding percentage of time providing direct instruction and having other duties related to gifted education were met.	<u>Individual Correction</u> None <u>Systemic Correction</u> None	<input checked="" type="checkbox"/> NA

Component 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)	OEC reviewed GIS teaching schedules. The district attested that this requirement is being met. 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 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)	Gifted education staff members hold the appropriate licensure or endorsement for the position.	<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)	This requirement does not apply. General education teachers do not provide gifted services.	<u>Individual Correction</u> None	<u>Systemic Correction</u> None	<input checked="" type="checkbox"/> NA