

**Jackson City School District  
IRN: 044156****Ohio Department of Education, Office for Exceptional Children  
2018-2019 IDEA Monitoring Review Summary Report****Introduction**

The Ohio Department of Education's Office for Exceptional Children (OEC) would like to extend appreciation to the Jackson City School District staff for their efforts, attention and time committed to the completion of the review process.

The following report is a summary of the onsite review conducted by OEC on January 15-16, 2019, as part of its general supervision requirements under the Individuals with Disabilities Education Act (IDEA) and Am. Sub. HB1.

**Overview**

During the onsite review, OEC consultants monitor the educational agency's implementation of IDEA to ensure compliance and positive results for students with disabilities. The primary focus of the review is to:

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

Onsite reviews are targeted to include the following specific areas:

- Child Find;
- Delivery of Services;
- Least Restrictive Environment;
- IEP Verification of delivery of services;
- Parent Input; and
- Teacher and Administrator Interviews.

**Data Sources**

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

1. Public Parent Meeting and Written Comments

Jackson City School District mailed 399 OEC approved letters to all families with students with disabilities in the educational agency. OEC provided the educational agency with a public meeting announcement to post on the district website. Public parent meeting dates for all educational agencies selected for onsite reviews are also posted on the ODE website.

On January 15, 2019, OEC consultants held a public meeting for parents and other interested parties. Two parents and family members and one State Support Team (SST) Region 16 representative attended the public meeting. Attendees could speak to OEC representatives publicly in the meeting, speak to OEC representatives individually, provide written comments or both. No attendees made comments during the public meeting. Written comment forms were available before, during and after the meeting. OEC did not receive any written comments.

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

## 2. Pre-Onsite Data Analysis

OEC conducted a comprehensive review which included district, building and grade level data; Special Education Performance Profile; Local Report Cards; Comprehensive Continuous Improvement Plan (CCIP); and Education Management Information System (EMIS) data. The data analysis assisted OEC in determining potential growth areas and educational agency strengths.

## 3. Record Review/IEP Verification

Prior to the onsite visit, OEC consultants reviewed 20 records of students with disabilities. OEC selected records of students with disabilities from a variety of disability categories and ages. Eleven (11) student records were selected for IEP verification in the classroom setting.

## 4. Staff/Administrative Interviews

On January 15, 2019, OEC consultants held nine sessions of interviews with nine administrators and 43 teachers, 11 related services personnel and school psychologists, and 11 paraprofessionals. OEC interviews focused on the following review areas: Child Find; Delivery of Services; Least Restrictive Environment (LRE) and IEP alignment and Discipline.

### **Findings of Noncompliance**

A finding is made when noncompliance is identified with evaluation team report (ETR) and/or individualized education program (IEP) requirements. Noncompliance that is systemic in nature or 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 review (listed by subject area in the *OEC's Review Findings and Educational Agency Required Actions Table*) must be corrected as indicated in the *Evidence of Correction/Required Actions* column.

OEC provides separate written correspondence to the parent/guardian when action is required to correct findings of noncompliance for individual students. The educational agency will receive copies of this correspondence.

### **Corrective Action Plan (CAP)**

The educational agency will develop a CAP to address any items identified in this summary report. An approved form for the CAP will be provided by OEC or can be accessed on ODE's website by using the keyword search "Monitoring". The CAP developed by the educational agency must include the following:

- Activities to address all areas identified in this summary report;
- Documentation/evidence of implementation of the activities;
- Individuals responsible for implementing the activities;
- Resources needed;
- Completion dates; and
- Continued Plan for Improvement and/or Compliance.

The educational agency must submit the CAP by email to [steven.moran@education.ohio.gov](mailto:steven.moran@education.ohio.gov) within 30 school days from the date of this report. OEC will review the action plan submitted by the educational agency for approval. If OEC deems that a revision(s) is necessary, the educational agency will be required to revise and resubmit. The educational agency will be contacted by OEC and notified when the action plan has been approved.

**CAP Due Date: May 22, 2019**

## **OEC Trainings**

As part of the OEC monitoring process, Jackson City School District personnel, as identified by OEC, are required to complete the Special Education Essentials 2018-19 training modules within the Learning Management System (LMS). OEC will provide specific instructions on completing these training modules during the Summary Report presentation. Participants must achieve a 75% or more on each quiz. Participants who do not achieve at least 75% will be contacted by the State Support Team (SST) for additional training.

*Completion of LMS Training Modules Due Date: May 22, 2019*

## **Individual Correction**

The educational agency has **60 school days** from the date of this summary report to correct all identified findings of noncompliance for individual students, unless noted otherwise in the report. Detailed information on individual findings are provided in a separate report.

*Individual Correction Due Date: September 28, 2019*

## **Systemic Correction**

The educational agency will provide OEC with documentation verifying the educational agency's completion of all CAP activities. OEC will verify systemic correction through the review of this documentation. If needed, OEC may request additional student records to review.

*Completion of Systemic Correction Due Date: February 4, 2020*

Once the educational agency has completed all action plan activities, the educational agency will use OEC's monitoring process to create and implement a Strategic Improvement Plan with the OEC and SST assistance.

For questions regarding the review, please contact: Steven Moran, OEC Contact Consultant, at (614) 752-2146, toll-free at (877) 644-6338, or by e-mail at [steven.moran@education.ohio.gov](mailto:steven.moran@education.ohio.gov).

**OEC's Review Findings and Educational Agency Required Actions**

**Component 1: Child Find**

*Each educational agency 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 educational agency, 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 Ohio Operating Standards 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	300.305(a) and 3301-51-11 (c)(1)(a)	<p><u>Record Review</u></p> <p>Preschool records were not reviewed.</p>	<p><u>Individual Correction</u></p> <p>NA</p> <p><u>Systemic Correction</u></p> <p>NA</p>	<input checked="" type="checkbox"/> NA
CF-2	3301-51-06	<p><u>Record Review</u></p> <p>Eleven (11) evaluations did not appropriately document interventions provided to resolve concerns for the child performing below grade-level standards.</p> <p><u>Other Considerations</u></p> <p>Initial evaluations must include a description of the research-based interventions, how long the interventions were given, the intensity of the interventions (duration and amount of time), description of results as it compares to the baseline and the decision that was made as a result of the intervention.</p> <p>Reevaluations must include a description as delineated above if interventions were provided in addition to the specially designed instruction (SDI), related services and other supports contained in the IEP. If no additional interventions were provided, a statement that it was determined by the ETR team that the IEP and supports were appropriate to meet the needs of the student must be included. This area cannot be left blank.</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 educational agency must submit evidence to OEC of written procedures and practices regarding documentation of intervention and supports provided prior to completion of the initial evaluation team report.</p>	<input checked="" type="checkbox"/> Yes The educational agency needs to address this finding in a Corrective Action Plan.

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
CF-3	300.501(b)(1) 3301-51-06 (E)(2)(a)	<u>Record Review</u> Three student records did not show evidence that the parent was afforded the opportunity to participate in the evaluation team planning meeting.	<u>Individual Correction</u> The educational agency must provide evidence that the parent was involved or provided the opportunity to participate in the evaluation planning process.  The evidence may include evaluation planning form, prior written notice, parent invitation, referral form or communication log.  If the educational agency cannot provide documentation that the parent was involved or provided the opportunity to participate in the evaluation planning process, the educational agency must conduct evaluation planning with the parent.  <u>Systemic Correction</u> The educational agency must submit evidence to OEC of written procedures and practices that include the parent in the evaluation planning process.	<input checked="" type="checkbox"/> No The educational agency does <u>not</u> need to address this finding in a Corrective Action Plan.
CF-4	300.300	<u>Record Review</u> Three student records did not provide evidence of parental consent obtained prior to new testing.	<u>Individual Correction</u> None  <u>Systemic Correction</u> The educational agency must submit evidence to OEC of written procedures and practices for obtaining parental consent obtained prior to new testing.	<input checked="" type="checkbox"/> No The educational agency does <u>not</u> need to address this finding in a Corrective Action Plan.

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
CF-5	300.304(c)(4) 3301-51-01 3301-51-06 (E)(2)(a)	<p><u>Record Review</u></p> <p>Eighteen (18) evaluations did not provide evidence that the evaluation addresses all areas related to the suspected disability.</p> <p><u>Interviews</u></p> <p>During interviews, there appeared to be confusion as to who was responsible for certain elements of the planning process. It is crucial that the team is involved through the entire process.</p> <p><u>Other Considerations</u></p> <p>Record reviews indicated that there were areas addressed on the planning form that were not actually assessed or addressed in the ETR. There appeared to be a disconnect between the processes that take place during the planning phase of the ETR and the information the ETR provided. If observation is listed on the planning form, the observation must take place outside of the testing environment. This information can be included but not used as standalone information for the observation requirement. Observations were not always included for students where SLD was a suspected disability. This is a requirement for SLD. All areas listed on the planning form must be addressed. There are also instances when the planning form was not included in the record so the ETR could not be reviewed.</p>	<p><u>Individual Correction</u></p> <p>The educational agency will convene the ETR teams to conduct a reevaluation and provide evidence that the evaluation addresses all areas related to the suspected disability.</p> <p><u>Systemic Correction</u></p> <p>The educational agency must submit evidence to OEC of written procedures and practices to provide evidence that the evaluation addresses all areas related to the suspected disability.</p>	<p><input checked="" type="checkbox"/> Yes</p> <p>The educational agency needs 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-6	300.306(c)	<p><u>Record Review</u></p> <p>Eighteen (18) evaluations did not show evidence of clearly stating the summary of assessment results.</p> <p><u>Other Considerations</u></p> <p>The information in this section must be clear and concise and not be a copy and paste of information from Part 1. The language should be written in terms that the parents, as well as involved professionals, can understand and use to create goals and services in the IEP. All areas addressed in Part 1 must be summarized in Part 2. In multiple instances, all areas were not summarized and/or information was not included that could be used to create meaningful goals and services within the IEP.</p>	<p><u>Individual Correction</u></p> <p>The educational agency will reconvene the ETR teams to conduct a reevaluation and provide a clear and concise summary of the data and assessment conducted that meets the requirements of 3301-51-06 (G) (Summary of information). The IEP team must consider the results of this reevaluation.</p> <p><u>Systemic Correction</u></p> <p>The educational agency must submit evidence to OEC of written procedures and practices regarding summary of data and assessment results.</p>	<p><input checked="" type="checkbox"/> Yes</p> <p>The educational agency needs to address this finding in a Corrective Action Plan.</p>
CF-7	300.306(c)	<p><u>Record Review</u></p> <p>Ten (10) evaluation team reports did not contain a clear and succinct description of educational needs.</p> <p><u>Other Considerations</u></p> <p>The description of educational needs must be individualized to all students and not based on their disability category. Through the record reviews, information listed in this section often included generic statements that would not allow the IEP team to create individualized services and develop an actionable IEP.</p>	<p><u>Individual Correction</u></p> <p>The educational agency will reconvene the ETR teams to conduct a reevaluation and provide a clear and succinct description of the student's educational needs. The IEP team must consider the results of this reevaluation.</p> <p><u>Systemic Correction</u></p> <p>The educational agency must submit evidence to OEC of written procedures and practices regarding description of educational needs.</p>	<p><input checked="" type="checkbox"/> Yes</p> <p>The educational agency needs 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(c)	<p><u>Record Review</u></p> <p>Eighteen (18) evaluation team reports did not contain specific implications for instruction and progress monitoring.</p> <p><u>Other Considerations</u></p> <p>This section must clearly describe the need and implication for specially designed instruction, and if applicable, related services. The information needs to be individualized and specific to the needs of the student. In many instances, there was no statement addressing progress monitoring.</p>	<p><u>Individual Correction</u></p> <p>The educational agency will reconvene the ETR teams to conduct a reevaluation and provide a clear description of specific implications for instruction and progress monitoring. The IEP team must consider the results of this reevaluation.</p> <p><u>Systemic Correction</u></p> <p>The educational agency must submit evidence to OEC of written procedures and practices regarding implications for instruction and progress monitoring.</p>	<input checked="" type="checkbox"/> Yes <p>The educational agency needs to address this finding in a Corrective Action Plan.</p>
CF-9	300.306(a)(1) 3301-51-01 (B)(21)	<p><u>Record Review</u></p> <p>Seven evaluations did not show evidence that a group of qualified professionals, as appropriate to the suspected disability, were involved in determining whether the child is a child with a disability as well as the child's educational needs.</p>	<p><u>Individual Correction</u></p> <p>The educational agency must provide evidence that the ETR teams and other qualified professionals, as appropriate, participated in the determination of eligibility and educational needs. If not, the ETR team must reconvene and provide OEC evidence of group participation.</p> <p><u>Systemic Correction</u></p> <p>The educational agency must submit evidence to OEC of written procedures and practices regarding the eligibility determination process.</p>	<input checked="" type="checkbox"/> Yes <p>The educational agency needs to address this finding in a Corrective Action Plan.</p>



**Component 2: Delivery of Services**

*Each educational agency 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	SPP Indicator 13 300.320 (b) 3301-51-07 (H)(2)	<p><u>Record Review</u></p> <p>Six IEPs did not show evidence that the postsecondary transition plan met all eight required elements of the IDEA for the student, specifically in the following area(s):</p> <ol style="list-style-type: none"> <li>1. There are appropriate measurable postsecondary goal(s).</li> <li>2. The postsecondary goals are updated annually.</li> <li>3. The postsecondary goals were based on age appropriate transition assessment (AATA).</li> <li>4. There are transition services that will reasonably enable the student to meet the postsecondary goal(s).</li> <li>5. The transition services include courses of study that will reasonably enable the student to meet the postsecondary goal(s).</li> <li>6. The annual goal(s) are related to the student's transition service needs.</li> <li>7. There is evidence the student was invited to the IEP Team Meeting where transition services were discussed.</li> <li>8. When appropriate, there is evidence that a representative of any participating agency was invited to the IEP Team Meeting.</li> </ol>	<p><u>Individual Correction</u></p> <p>The educational agency must reconvene the teams to review and correct the postsecondary transition plan for the IEPs identified as noncompliant or provide documentation of the student's withdrawal date from the educational agency.</p> <p><u>Systemic Correction</u></p> <p>The educational agency must submit evidence to OEC of written procedures and practices regarding transition services.</p>	<p><input checked="" type="checkbox"/> Yes</p> <p>The educational agency needs to address this finding in a Corrective Action Plan.</p>

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
DS-2	300.320(a)(1)	<p><u>Record Review</u></p> <p>Nineteen (19) IEPs did not contain Present Levels of Academic Achievement and Functional Performance (PLOP) that addressed the needs of the student.</p> <p><u>Other Considerations</u></p> <p>The PLOPs were missing the required components in multiple records. Baseline data did not always align to the goal or it was omitted completely. PLOPs contained direct copy and paste information from the ETR that did not include the required information directly related to the goal area.</p>	<p><u>Individual Correction</u></p> <p>The educational agency must reconvene the IEP teams of the IEPs identified as noncompliant to review and amend the PLOP related to each goal to include:</p> <ul style="list-style-type: none"> <li>• Summary of current daily academic/behavior and/ or functional performance (strengths and needs) compared to expected grade level standards in order to provide a frame of reference;</li> <li>• Baseline data provided for developing a measurable goal.</li> </ul> <p><u>Systemic Correction</u></p> <p>The educational agency must submit evidence to OEC of written procedures and practices regarding the review of current academic/functional data when writing IEPs.</p>	<p><input checked="" type="checkbox"/> Yes</p> <p>The educational agency needs to address this finding in a Corrective Action Plan.</p>
DS-3	300.320(a)(2)(i)	<p><u>Record Review</u></p> <p>Three IEPs did not contain annual goals that address the child's academic area(s) of need.</p>	<p><u>Individual Correction</u></p> <p>The educational agency must reconvene the teams of the IEPs identified as noncompliant to review and amend the IEP. Annual goals must address the academic needs of the child unless the team provides evidence that the goals were prioritized based on the severity of the needs of the child.</p> <p><u>Systemic Correction</u></p> <p>The educational agency must submit evidence to OEC of written procedures and practices regarding the IEP process of addressing identified academic needs.</p>	<p><input checked="" type="checkbox"/> No</p> <p>The educational agency 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-4	300.320(a)(2)(i)	<p><u>Record Review</u></p> <p>Seven IEPs did not contain annual goals that address the child's functional area(s) of need.</p> <p><u>Other Considerations</u></p> <p>There was a common misunderstanding by the staff that all functional needs addressed in the ETR must be aligned to the IEP and addressed. If the team agrees to prioritize needs, a statement must be included explaining the prioritization.</p>	<p><u>Individual Correction</u></p> <p>The educational agency must reconvene the teams of the IEPs identified as noncompliant to review and amend the IEP. Annual goals must address the functional needs of the child unless the team provides evidence that the goals were prioritized based on the severity of the needs of the child.</p> <p><u>Systemic Correction</u></p> <p>The educational agency must submit evidence to OEC of written procedures and practices regarding the IEP process of addressing identified functional needs.</p>	<input checked="" type="checkbox"/> Yes <p>The educational agency needs to address this finding in a Corrective Action Plan.</p>
DS-5	300.320(a)(2)(i)	<p><u>Record Review</u></p> <p>Eighteen (18) IEPs did not contain measurable annual goals.</p>	<p><u>Individual Correction</u></p> <p>The educational agency must reconvene the teams of the IEPs identified as noncompliant to review and amend annual goals to contain the following critical elements:</p> <ol style="list-style-type: none"> <li>1. Clearly <u>defined behavior</u>: the specific action the child will be expected to perform.</li> <li>2. The <u>condition</u> (situation, setting or given material) under which the behavior is to be performed.</li> <li>3. <u>Performance criteria</u> desired: the level the child must demonstrate for mastery <b>and</b> the number of times the child must demonstrate the skill or behavior.</li> </ol> <p><u>Systemic Correction</u></p> <p>The educational agency must submit evidence to OEC of written procedures and practices regarding the development of measurable annual IEP goals.</p>	<input checked="" type="checkbox"/> Yes <p>The educational agency needs 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-6	3301-51-07(B) and (C) 3301-51-07(L) 3301-51-07(H)(1)(d)	<u>Record Review</u>  Fifteen (15) IEPs did not show evidence that data were collected and analyzed to monitor performance on each goal and objective.	<u>Individual Correction</u>  None  <u>Systemic Correction</u>  The educational agency must submit evidence to OEC of written procedures and practices to provide evidence that the data were collected and analyzed to determine the present levels of academic and functional performance the student made on each goal and objective.	<input checked="" type="checkbox"/> Yes  The educational agency needs to address this finding in a Corrective Action Plan.
DS-7	300.320(a)(4) 3301-51-07(H)(1)(e)(i)	<u>Record Review</u>  Fifteen (15) IEPs did not contain a statement of specially designed instruction that addresses the individual needs of the child and supports the annual goals.  <u>Other Considerations</u>  All goals must contain a statement of specially designed instruction (SDI). All goals must be addressed individually. It was noted SDI descriptions were often generic statements based on the area of need rather than based on the individual needs of the student.	<u>Individual Correction</u>  The educational agency must reconvene the teams of the IEPs identified as noncompliant to review and amend the specially designed instruction, as appropriate, to address the needs of the child.  <u>Systemic Correction</u>  The educational agency must submit evidence to OEC of written procedures and practices regarding the IEP process of determining specially designed instruction.	<input checked="" type="checkbox"/> Yes  The educational agency needs to address this finding in a Corrective Action Plan.
DS-8	3301-51-07(L)(2)	<u>Record Review</u>  Four IEPs did not contain measurable annual goals and services/placement consistent with progress made.	<u>Individual Correction</u>  None  <u>Systemic Correction</u>  The educational agency must submit evidence to OEC of written procedures and practices regarding measurable annual goals and services consistent with progress made.	<input checked="" type="checkbox"/> No  The educational agency 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-9	300.320(a)(7) 3301-51-07 (H)(1)(i)	<u>Record Review</u> Four IEPs did not indicate the location where the specially designed instruction will be provided.	<u>Individual Correction</u> The educational agency must reconvene the teams of the IEPs identified as noncompliant to review and amend the location where the specially designed instruction will be provided.  <u>Systemic Correction</u> The educational agency must submit evidence to OEC of written procedures and practices regarding the IEP process of determining the location where specially designed instruction will occur.	<input checked="" type="checkbox"/> No The educational agency does <u>not</u> need to address this finding in a Corrective Action Plan.
DS-10	300.320(a)(7) 3301-51-07 (H)(1)(i)	<u>Record Review</u> Three IEPs did not indicate the amount of time and frequency of the specially designed instruction.	<u>Individual Correction</u> The educational agency must reconvene the teams of the IEPs identified as noncompliant to review and amend the amount of time and frequency of the specially designed instruction.  <u>Systemic Correction</u> The educational agency must submit evidence to OEC of written procedures and practices regarding the IEP process of determining the amount and frequency of specially designed instruction to be provided.	<input checked="" type="checkbox"/> No The educational agency does <u>not</u> need to address this finding in a Corrective Action Plan.
DS-11	300.320(a)(4) 3301-51-07 (H)(1)(e)	<u>Record Review</u> Three IEPs did not identify related services that address the needs of the child and support the annual goals.  <u>Other Considerations</u> All related services provided to students must be included in this section and include the skills and methods that are going to be addressed. The ETRs indicated that students had specific needs that may require related services. However, these services were not always addressed in the IEPs.	<u>Individual Correction</u> The educational agency must reconvene the teams of the 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> The educational agency must submit evidence to OEC of written procedures and practices regarding the IEP process of addressing identified related service needs.	<input checked="" type="checkbox"/> Yes The educational agency needs 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-12	300.320(a)(7) 3301-51-07 (H)(1)(i)	<u>Record Review</u> One IEP did not indicate the location where the related services will be provided.	<u>Individual Correction</u> The educational agency must reconvene the team of the IEP identified as noncompliant to review and amend the IEP to include the location where the related services will be provided.  <u>Systemic Correction</u> The educational agency must submit evidence to OEC of written procedures and practices regarding the IEP process of determining the location where related services will occur.	<input checked="" type="checkbox"/> No The educational agency does <u>not</u> need to address this finding in a Corrective Action Plan.
DS-13	300.320(a)(7) 3301-51-07 (H)(1)(i)	<u>Record Review</u> Three IEPs did not indicate the amount of time, duration and frequency of the related services to be provided.	<u>Individual Correction</u> The educational agency must reconvene the teams of the 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> The educational agency must submit evidence to OEC of written procedures and practices regarding the IEP process of determining the amount and frequency of related services to be provided.	<input checked="" type="checkbox"/> Yes The educational agency needs 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-14	3301-51-07	<p><u>IEP Verification</u></p> <p>Of the 20 IEPs reviewed, OEC conducted 11 IEP Verifications in the classroom setting.</p> <p>For all the IEP verifications that took place, the OEC team members, as well as the State Support Team members, were very complimentary of the services taking place in the classrooms across all buildings within the district. Some team members noted that in many instances the services being delivered went above and beyond what was listed in the IEP. This is a great opportunity for the district to become more conscious of the information that is being put into the documents ensuring the IEPs include all the successful interventions and systems the staff has put in place to help that student be successful. This is crucial in instances where students may switch districts, or move to a different building/grade level to allow the teacher to best serve that student.</p>	<p><u>Individual Correction</u></p> <p>NA</p> <p><u>Systemic Correction</u></p> <p>NA</p>	<input checked="" type="checkbox"/> NA
DS-15	3301-51-07(L)	<p><u>Record Review</u></p> <p>All IEPs showed evidence that revisions were made based on data indicating changes in student needs or abilities.</p>	<p><u>Individual Correction</u></p> <p>NA</p> <p><u>Systemic Correction</u></p> <p>NA</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-16	300.324(a)(2)(v) 3301-51-01(B)(3)	<u>Record Review</u> One IEP did not identify assistive technology to enable the child to be involved and make progress in the general education curriculum.	<u>Individual Correction</u> The educational agency must reconvene the team of the 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.  <u>Systemic Correction</u> The educational agency must submit evidence to OEC of written procedures and practices regarding assistive technology.	<input checked="" type="checkbox"/> Yes The educational agency needs to address this finding in a Corrective Action Plan.
DS-17	300.320(a)(6)(i) 3301-51-07(H)(1)(g)	<u>Record Review</u> Seventeen (17) IEPs did not identify accommodations provided to enable the child to be involved and make progress in the general education curriculum.	<u>Individual Correction</u> The educational agency must reconvene the teams of the IEPs identified as noncompliant to review the accommodations that would directly assist the child to access the course content without altering the scope or complexity of the information taught and include them on the IEP.  <u>Systemic Correction</u> The educational agency must submit evidence to OEC of written procedures and practices regarding accommodations.	<input checked="" type="checkbox"/> Yes The educational agency needs to address this finding in a Corrective Action Plan.
DS-18	300.320(a)(4) 3301-51-07(H)(1)(e)	<u>Record Review</u> Eight IEPs did not identify modifications to enable the child to be involved and make progress in the general education curriculum.	<u>Individual Correction</u> The educational agency must reconvene the teams of the IEPs identified as noncompliant to review the modifications that would alter the amount or complexity of grade-level materials and would enable the child to be involved and make progress in the general education curriculum and include them in the IEP  <u>Systemic Correction</u> The educational agency must submit evidence to OEC of written procedures and practices regarding modifications.	<input checked="" type="checkbox"/> Yes The educational agency needs 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-19	3301-51-07 (H)(1)(h)(ii)	<p><u>Record Review</u></p> <p>This area was not reviewed. The records reviewed were prior to the requirement of the AASCD Participation Criteria form when deciding if the alternate assessment is appropriate for the student.</p> <p><b>Please Note: The AASCD criteria form is a required document on records written after July 1, 2018.</b></p>	<p><u>Individual Correction</u></p> <p>The educational agency must reconvene the teams of the IEPs identified as noncompliant to review and complete the AASCD Participation Criteria form. The team must decide if the alternate assessment is appropriate for the student.</p> <p><u>Systemic Correction</u></p> <p>The educational agency must submit evidence to OEC of written procedures and practices regarding the use and completion of the AASCD Participation Criteria form.</p>	<input checked="" type="checkbox"/> NA
DS-20	300.320(a)(4) 3301-51-07 (H)(1)(e)	<p><u>Record Review</u></p> <p>Five IEPs did not identify supports for school personnel to enable the child to be involved and make progress in the general education curriculum.</p> <p><u>Other Considerations</u></p> <p>The IEPs did not describe the support to school personnel who may need assistance in implementing the student's IEP. This is adult support detailing who will receive the support, what support will be provided, who will provide that support, and where the support will take place.</p>	<p><u>Individual Correction</u></p> <p>The educational agency must reconvene the teams of the IEPs identified as noncompliant to review the supports for school personnel that were identified by the IEP team and define the supports on the IEP including who will provide the support and when it will take place."</p> <p><u>Systemic Correction</u></p> <p>The educational agency must submit evidence to OEC of written procedures and practices regarding supports for school personnel.</p>	<input checked="" type="checkbox"/> Yes <p>The educational agency needs 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-21	300.321(5) 3301-51-07(l)	<u>Record Review</u> Three IEPs did not indicate that the IEP Team included a group of qualified professionals.	<u>Individual Correction</u> For the IEPs identified as noncompliant, the educational agency must: <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 educational agency 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 with all required members present.</li> </ul> <u>Systemic Correction</u> The educational agency must submit evidence to OEC of written procedures and practices regarding the involvement of people qualified to interpret the instructional implications of evaluation results in the IEP process.	<input checked="" type="checkbox"/> No The educational agency does <u>not</u> need to address this finding in a Corrective Action Plan.

### Component 3: Least Restrictive Environment (LRE) and IEP Alignment

Each educational agency 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	300.114 300.320(a)(5) 3301-51-07 (H)(1)(f)	<p><u>Record Review</u></p> <p>Four IEPs did not include an explanation of the extent to which the child will not participate with nondisabled children in the general education classroom.</p>	<p><u>Individual Correction</u></p> <p>The educational agency must reconvene the teams of the IEPs identified as noncompliant to review and include a justification as to why the child was removed from the general 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 general classroom with supplementary aids and services.</li> <li>• Document that the nature or severity of the disability is such that education in general education classes, even with the use of supplementary aids and services, cannot be achieved satisfactorily.</li> <li>• Describe potential harmful effects to the child or others, if applicable.</li> </ul> <p><u>Systemic Correction</u></p> <p>The educational agency must submit evidence to OEC of written procedures and practices regarding the least restrictive environment placement decision process.</p>	<p><input checked="" type="checkbox"/> No</p> <p>The educational agency does <u>not</u> need to address this finding in a Corrective Action Plan.</p>

## Other Findings and Considerations

1. Jackson City Schools services approximately 422 students with disabilities, 39 who are preschoolers, 383 school-aged (25 speech only). Currently, there are only 1.4 school psychologists (1 full time, and one 2 days a week), which exceeds the caseload ratio identified in the *Ohio Operating Standards for the Education of Children with Disabilities* (3301-51-09). This rule states: *A school psychologist shall provide services to no more than: One Hundred twenty-five school-aged children with disabilities, or Seventy-five preschool children with disabilities.*

### Corrective Action

Jackson City Schools must address the caseload ratio in its Corrective Action Plan (CAP) to ensure the caseload ratio falls within the requirements of the Operating Standards. In addition, Jackson City Schools will develop a plan to ensure that School Psychologists services are immediately available as required in the Operating Standards.

2. Staff members spoke very highly of the “red folder” system that the school psychologists have designed and implemented across the buildings. This system is used as part of the RTI process for students who are being considered for special education services. Staff members appeared to be on board and familiar with the methods used to collect data on students for the evaluation process. There is an opportunity here to put this process into formal policy to ensure continuity of implementation.