

**2012-2013**

**On-Site Review Guidelines**

**for**

**Local Education Agencies**

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**IDEA Review**  
(Individuals with Disabilities Education Improvement Act)  
**and**  
**Gifted Education Review**

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## Introduction

### General Supervision of Services to Children with Disabilities

Federal Law requires states to establish a system of general supervision that monitors local education agencies' (LEA) implementation of the Individuals with Disabilities Education Improvement Act (IDEA) of 2004 and Am. Sub. HB1, and the provision of Free Appropriate Public Education (FAPE). The Ohio Department of Education (ODE) fulfills this requirement through its Office for Exceptional Children (OEC). OEC, in coordination with the Office for Early Learning and School Readiness (OEL&SR), has developed a Comprehensive Monitoring System for Continuous Improvement that includes three levels of review. The Comprehensive Monitoring System is designed to ensure 100 percent compliance with the statutory requirements of the IDEA and the Ohio Operating Standards for Ohio Educational Agencies Serving Children with Disabilities, and improve services and outcomes for students with disabilities. For more information regarding Ohio's Comprehensive Monitoring System see Ohio's General Supervision document located on the ODE website <http://www.education.ohio.gov/GD/Templates/Pages/ODE/ODEPrimary.aspx?Page=2&TopicID=967&TopicRelationID=1897> under General Supervision and Monitoring Processes.

All LEAs in Ohio participate in some level of monitoring on an annual basis.

### Purpose of this Document

This document provides guidance for LEAs that have been selected for an on-site review. The Guidelines will provide district personnel with information regarding:

- How LEAs are selected for an on-site review;
- How to prepare for the review;
- What to expect during the review; and
- How findings of non-compliance, if any, must be addressed and corrected.

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## Components of Onsite Review

The onsite review includes the following components:

- ❖ Special Education-School Age: focuses on Child Find process in the LEA; the delivery of services to children with disabilities; alignment of children's IEPs to LRE; Discipline, and Data Verification of LEA data submitted to ODE through the Education Management Information System (EMIS). During the review, the OEC team will verify LEA data reported during the school year prior to the current onsite review:
  - a. Dec. 1 Child Count Report (EMIS reporting period M);
  - b. For LEAs reporting 100 percent on the State Performance Plan (SPP) Indicator 11 (Child Find), Indicator 12 (Preschool Transition) and Indicator 13 (Secondary Transition).
- ❖ Special Education-Early Childhood: focuses on ensuring that Child Find activities and services are being implemented by the LEA to support children receiving preschool special education and the transition of preschool children with disabilities to kindergarten.
- ❖ Fiscal: focuses on the management and use of IDEA Part B and Early Childhood Special Education Part B Funds allocated to the LEA. OEC will review: expenditures including payroll; the LEA's procurement and equipment policies; LEA staff licensure; Comprehensive Early

Intervening Services (CEIS); and chartered nonpublic and non-chartered nonpublic LEA requirements.

- ❖ **Gifted Education Review:** focuses on ensuring that LEAs are compliant with Am. Sub. HB 153, and the statutory regulations regarding gifted education in Ohio. OEC will review gifted education budget and expenditures, identification procedures, Written Education Plans (WEPs) and Written Acceleration Plans (WAPs), provision of equitable services across the district, student contact time associated with services, assignment and qualifications of gifted staff and professional development for regular education teachers providing gifted services.

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### LEA On-Site Review Selection and Notification

To minimize disruption to LEAs from multiple forms of monitoring, OEC works in partnership with the Office of Federal Program's (OFP) Program Audit Compliance Tracking System (PACTS) to select LEAs. Both offices will conduct reviews at that same time, when feasible. LEAs are selected randomly (except the 21 urban LEAs, which will be reviewed every three years), based on the PACTS cohort system, for on-site reviews conducted by OEC.

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### Review Teams

OEC onsite review teams consist of staff from OEC's Monitoring, Supports & Services (MSS), Resource Management (RM), Gifted Sections and OEL&SR.

A State Support Team (SST) representative from the LEA's region is required to attend the initial meeting with the LEA, public parent meeting, interviews with LEA staff, and the exit meeting. The SST will also provide technical assistance to the LEA in the corrective action planning process and support the LEA with technical assistance and professional development if required.

The district will identify a **cross-functional team**, whose members will actively participate in the review and corrective action process. Required membership includes:

- District administration; Superintendent, Treasurer (include administrators with authority to direct resources that affect change); community school sponsor and management company representative;
- Special education coordinator;
- Gifted coordinator;
- Early childhood coordinator;
- Curriculum supervisors or coordinators;
- Data management staff (EMIS coordinator);
- Individual(s) familiar with the Comprehensive Continuous Improvement Plan (CCIP);
- Related service providers;
- School psychologists;
- Teachers;
- Parents;
- Students;
- State Support Team (SST) representative;
- ODE representative.

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### Team Coordinator Roles and Responsibilities

OEC designates a review Team Coordinator who coordinates and facilitates onsite review activities with the Office of Federal Programs (OFP), OEC, OEL&SR and the LEA.

#### *Team Coordinator will:*

- Contact the LEA and work with the LEA designated lead contact and OFP lead to apprise of onsite review activities;
- Contact the SST single point of contact person (SPOC) to identify the SST representative for the LEA;
- Conduct an analysis of LEA data (SPP profile, Local Report Cards, EMIS data, etc.) with team members, including SST consultants.
- Use the data analysis, work with stakeholders to identify areas to be targeted for the onsite review;
- Use district data to select records 2-4 weeks prior to the onsite visit and notify LEA contact person what documents are needed so they are available upon OEC's arrival;
- Prepare and send Onsite Summary Report to LEA;
- Assist LEA with the development of the corrective action plan (CAP).

### SST Representative Roles and Responsibilities

A State Support Team (SST) representative will assist the LEA with its preparation for the onsite review visit and will provide technical assistance and professional development as needed.

#### *SST Representative will:*

- Assist OEC with data analysis to identify areas to be targeted for the onsite review.
- Assist LEA with planning and preparation for onsite visit;
- Attend the initial onsite meeting with LEA and OEC review team;
- Attend and assist with the public parent meeting;
- Attend the group interviews with administrators, teachers, and related personnel;
- Attend the exit meeting with LEA and OEC review team;
- Receive and review a copy of the LEA summary report and CAP template;
- Contact LEA within 5 school days of receipt of the summary report and offer assistance with CAP development;
- Assist LEA with development of CAP;
- Contact LEA to plan implementation of required progress monitoring activities for CAP;
- Communicate with LEA to remind them of due dates listed on CAP;
- Follow up monthly and/or quarterly with LEA to determine progress with CAP activities;
- Inform OEC monthly and/or quarterly the SST's involvement with LEA and LEA's progress with CAP activities.

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## **Preparation for On-site Review**

#### *LEA will:*

- Designate a lead contact person to work with OEC Team Coordinator to organize and schedule on-site activities;
- Designate an LEA contact for special education, gifted education, fiscal, and preschool components of the review (may be the same person as the LEA contact);
- Identify and inform OEC of a location for individual parent and public parent meeting(s).

## Parent Public Meeting

### *LEA will:*

- Ensure the room is handicapped accessible;
- Mail parent public meeting notice (provided by OEC on ODE letterhead) to all LEA's parents/guardians of students with disabilities in the school district at least four weeks before the meeting date;
- Retain a copy of the public notice to the parent in the student's special education file;
- Post parent public meeting notice on the LEA's website at least two weeks before the parent public meeting;
- Arrange for any special accommodations, such as interpreters, that are needed for the individual or parent public meetings;
- Submit invoice for postage costs within 30 days of review, but no later than June 1, 2013 to:  
 Attn: Donna Horn  
 Office for Exceptional Children  
 25 S. Front St., 2<sup>nd</sup> Floor  
 Columbus, OH 43215

### *OEC will:*

- **Reimburse** the LEA for postage costs through the district's CCIP as Additional Allocation.
- Schedule individual meetings with parents and take reservations for the parent public meeting;
- Collaborate with the LEA if special accommodations are needed for individual and public parent meetings a week before the scheduled meeting;

## Documents and Student Records Review

To ensure efficiency of the onsite, the elements listed in each category are critical:

### *Fiscal will contact the Treasurer through a separate letter to:*

- Provide the LEA with information on the fiscal areas which will be reviewed, including a copy of the Review On-Site tool and a Quick Reference Guide to assist with the review preparation;
- Request a series of fiscal reports to be provided to OEC prior to the site visit;
- Provide a list of specific items for which fiscal support information must be provided by the district during the site visit;
- Require that items identified in the Review On-site Tool and in the Quick Reference Guide be made available for review during the site visit.

The Review On-site Tool and Quick Reference Guide are available on ODE's website:

<http://www.ode.state.oh.us/GD/Templates/Pages/ODE/OEDDetail.aspx?page=3&TopicRelationID=1897&ContentID=130879&Content=131417>

### *Gifted will:*

- Provide a list of SSID numbers to the LEA of selected student records that will be reviewed during the onsite.

### *OEC/OEL&SR will:*

- Provide a list of SSID numbers to the LEA of selected student records from the LEA's 2011-2012 school year-end report via the EMIS database that will be reviewed during the onsite.

**LEA will:**

- Secure a room for OEC team to conduct on-site activities that allows OEC team to use their laptop computers for review activities (**access to the Internet and IT support is mandatory**);
- Notify OEC Team Coordinator of document and record review location;
- Submit to the appropriate OEC contacts all required documents according to the *OEC Documents Required for On-site Review* (Appendix ii);
- Ensure that all required on-site documents (Appendix ii) are available to review team on the first day of the review. The documents need to be **organized** according to the components identified (special education school-age and preschool, fiscal and gifted education) in Appendix ii.

**Interviews with LEA personnel****LEA will:**

- Work with the OEC Team Coordinator to select LEA personnel who will participate in the interviews (intervention specialists, related service providers and general education teachers who are associated with the records reviewed);
- In collaboration with the on-site review Team Coordinator, determine the district/building-level administrative personnel who will participate in the interview sessions;
- Secure and notify OEC of the location and schedule time for the interview sessions;
- **Submit invoice for substitute costs within 30 days of review, but no later than June 1, 2013 to:**

Attn: Donna Horn  
Office for Exceptional Children  
25 S. Front St., 2<sup>nd</sup> Floor  
Columbus, OH 43215

**OEC will:**

- **Reimburse** the LEA for substitute costs through the district's CCIP as Additional Allocation;
- Determine the length of interview sessions

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## **On-site Review Activities**

On-site Reviews conducted by OEC are comprised of Special Education School Age, Early Childhood, Fiscal and Gifted Education Reviews. All data gathered through the pre-onsite analysis of LEA data will identify targeted areas of focus during the onsite review process. The review process which includes: review of student records and documents, data verification components, and related interview question responses will be triangulated to identify systemic noncompliance. See Appendix iv for Sample Onsite Review Schedule.

**Initial Onsite Meeting with LEA**

- Review onsite schedule and see if any changes have been or need to be made;
- Explain the pre-onsite analysis of data and why/how record and interview questions were selected;
- Address any LEA questions about the review;
- Provide LEA with opportunity to share what the LEA is working on and/or any LEA identified issues;
- Review public meeting requirements and process;
- Determine if an LEA representative will be available to meet with parents who want to talk to the LEA about a concern the parent addresses in an individual meeting.

### Student Record Document Review and Data Verification

A sample number of school age student special education records will be selected to review, based on OEC review team's analysis of the LEA's current SPP Indicator data and other related LEA data. OEC's record selection may be random across grade levels, disability categories, or buildings may be targeted.

Fiscal, Gifted and OEL&SR team members will select documents and specific student records for their components of the review.

#### *LEA will:*

- Will have all OEC requested student records available and organized on Day 1 of the review;
- Provide additional documentation or evidence of policies, procedures or practices, as requested by the review team;
- Verify and/or update student addresses, only if individual cases of non-compliance are identified by the ODE team.

#### *Gifted will:*

- Review student gifted records;
- Review all LEA documents listed for gifted in *Appendix ii*.

#### *OEC and OEL&SR will:*

- Review student school age and preschool special education records;
- Review all LEA documents listed for school age, preschool special education and fiscal in *Appendix ii*;
- Verify accuracy of EMIS data reported to ODE per student records for the 2010-2011 data reporting year. (This is only for school districts who reported 100%).

### Public Meeting

The OEC Team Coordinator facilitates the public meeting where participants have an opportunity to **express concerns** or **support** for the overall special education program in the LEA. There will be time scheduled for individual meetings with parents, if requested. This is not for parents to discuss individual issues or complaints. Parent comments will be considered as part of the qualitative data reviewed by the on-site team.

#### *LEA will:*

- Have a representative at the parent public meeting, who will introduce the OEC review team and be available at the end of the parent public meeting for closing remarks. LEA representative will **not** be present during the parent meeting;
- Provide copies of *Whose IDEA is This?*;
- Provide access to LCD projector.

#### *OEC will:*

- Conduct individual meetings with parents upon parent request, between 3:00 and 5:00 p.m. on the meeting day;
- Facilitate a public parent meeting from 5:30 to 7:00 p.m.

### Individual Meeting with Parent

The OEC Team Coordinator, Team Member, and SST representative will listen to parent(s) and allow them to express concerns or support for the LEA's special education program.

If the LEA has consented to be available during individual meetings to address any concerns or issue a parent has, the review team will ask the parent if they wish to talk to the LEA representative that is available. A team member will introduce the parent to the representative (if needed) and provide a brief overview of the parent's concern to the LEA.

### Interviews with LEA Personnel

Interviewees will answer the questions asked by the OEC review team and provide evidence to support the LEA's responses, if requested.

Interviews will be conducted separately with:

- Teams consisting of special education teachers, regular education teachers, related service providers and all other providers whose records were reviewed on-site. (Teams will be 5 to 10 members);
- Teams of LEA administrators;
- Any other stakeholders involved in the LEAs special education process.

*LEA will:*

- Provide additional documentation or evidence of policies, procedures or practices as requested by OEC in response to information gathered during the interviews;
- Allow up to 90 minutes for each interview group;

*OEC will:*

- Assist LEA in selection of interviewees;
- Conduct interviews with LEA staff, using OEC's on-site review interview protocols;
- Document LEA staff responses during the interviews;
- Ask (when appropriate) for the LEA to provide documentation or evidence to support the responses of the LEA interview team.

### Exit Meeting with LEA

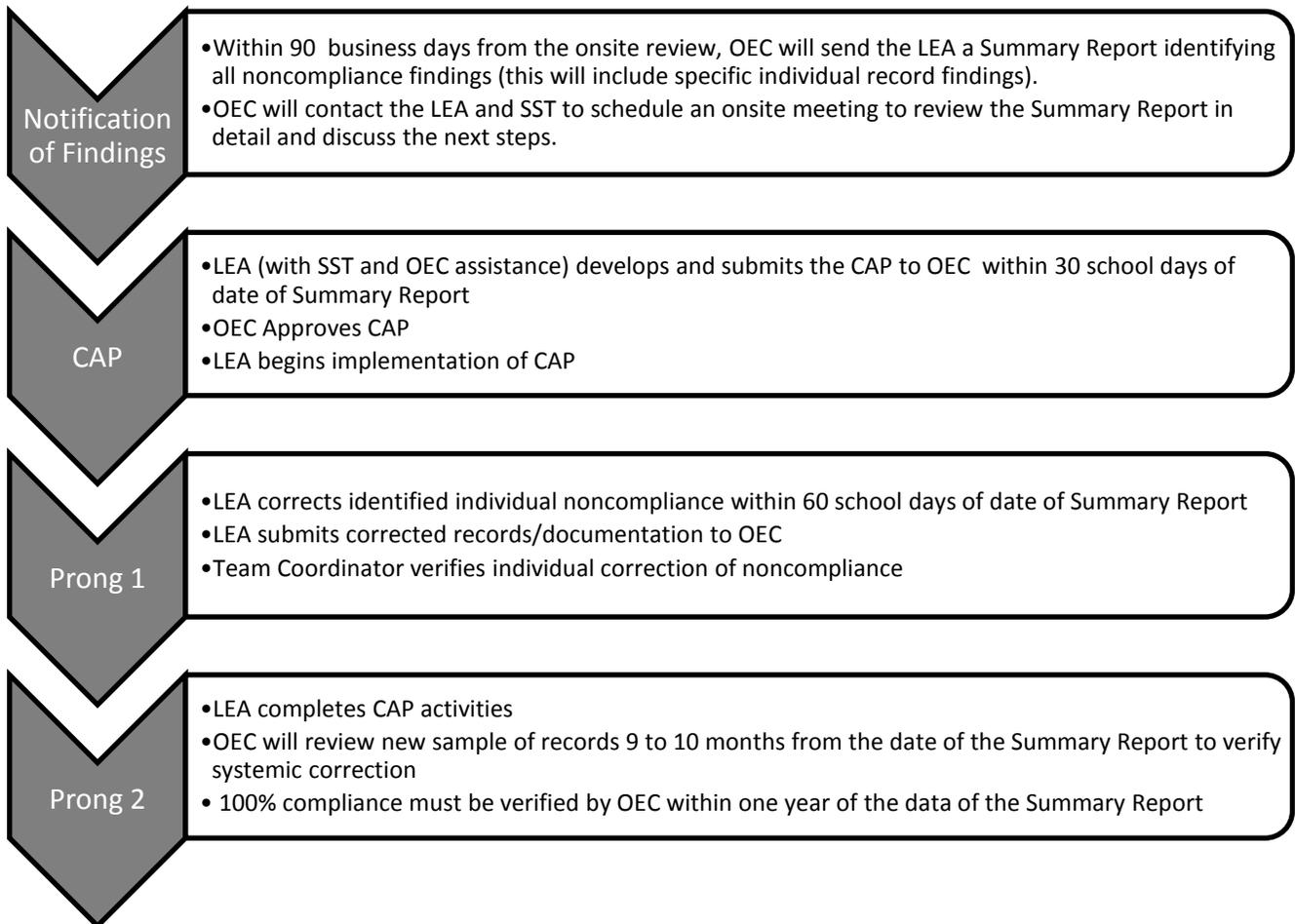
OEC's On-site Review Team will conduct an exit meeting with the LEA's Cross Functional Team. The purpose of the exit meeting is to review the following;

- An explanation of OEC's post-onsite process;
- Provide a general summary of any noncompliance components in the areas of child find, delivery of services, least restrictive environment, discipline and data verification. In addition, fiscal, gifted, and early childhood consultants will give a general summary of their on-site review as well. ***There is limited discussion with the LEA regarding individual records of students, unless it is a FAPE concern that the LEA must attend to on an expedited timeline;***
- Timelines for LEA onsite summary report and corrective action process;
- Role of the OEC and SST in assisting with the development of the CAP and the professional development/technical assistance the SST will provide to the LEA;
- Parent notification and process for individual cases of noncompliance (corrected within 60 school days of parent notification letter);
- Review with LEA if additional documentation or data is to be sent to OEC consultants;
- Remind the LEA of its legal obligation to provide a free appropriate public education (FAPE) to all students with disabilities that have an IEP.

## Post-On-site Activities

The OEC review team will triangulate the data gathered from the on-site review activities to identify findings of noncompliance in the LEA. Noncompliance is identified whenever OEC finds a compliance level **less than 100%** in any area of the onsite review (parent/public comments, student records, data verification, document reviews, or interviews). All identified noncompliance must be corrected by the LEA as soon as possible but no later than one year from the date of the Summary Report.

### Process and Timelines



### Summary Report

OEC will send the LEA the on-site summary report within *90 business days* of the on-site review. The summary report will identify:

- Findings of non-compliance in the LEA;
- Individual Corrections needed
- Systemic Corrections needed.

The report will include supporting evidence gathered during the review used to identify areas of noncompliance:

- Total number of records reviewed, number interviewed and number of parent comments;
- Information gathered through LEA staff interviews and parent meetings;
- Indication of record review item that was found noncompliant;
- Due dates for individual corrections, CAP submission, and systemic correction

## Parent Letters for Individual Cases of Non Compliance

OEC will contact the Superintendent regarding written notification to parents/guardians if findings of non-compliance are identified for individual students during the record review. Copies of the parent notification letter(s) will be sent to the LEA via U.S. mail.

OEC will mail written notification letters to parents/guardians of any individual cases of non-compliance findings identified during the review.

## Follow-up meeting with LEA

After LEA receives the summary report, OEC will contact the LEA and SST to schedule an onsite meeting to review the summary report with the LEA contact. This will provide time to clarify and/or answer any questions the LEA might have regarding the findings in the report and discuss the next steps.

## Corrective Action Plan (CAP)

Whenever a finding of non-compliance is identified in 30% or more of the records reviewed by OEC and substantiated through other data sources, the LEA is required to develop a corrective action plan that addresses identified areas of non-compliance and include improvement strategies to ensure correction.

The LEA is required to use the corrective action plan (CAP) template to develop an action plan to address all areas of non-compliance, and must submit an electronic copy of the plan to the Team Coordinator **within 30 school days** of the LEA's *Onsite Summary Report*.

The SST representative will work with the LEA in developing the CAP. If the LEA does not agree to work with the SST, OEC staff will be available to provide technical assistance and access to resources for development of the CAP.

### *LEA must:*

- Work with OEC staff and a SST representative in developing a CAP;
- Examine the root cause(s) of non-compliance to assist with developing and implementing policies, procedures and practices to ensure 100 percent compliance and ongoing compliance;
- Address all systemic findings of non-compliance identified in the Summary Report in the CAP using the template provided for the CAP (This can be found on ODE's website under Students with Disabilities, Comprehensive Monitoring System, IDEA Onsite Reviews);
- Review and revise LEA policies, procedures, practices or forms to ensure 100 percent compliance which may include: establishing internal controls to ensure ongoing compliance, staff training, increased supervision; changing staff assignments or adding staff and other resources;
- Submit a signed, electronic version of the CAP to OEC Team Coordinator for approval **within 30 school days** from the date of the LEA Summary Report. See Appendix v for instructions on submitting CAP with an electronic signature.

### *OEC and OEL&SR will:*

- Review the CAP submitted to OEC;
- Require the LEA to revise and resubmit the CAP, if a revision is necessary;
- Notify LEA of OEC approval of the action plan via e-mail.

## Implementation of OEC Approved Corrective Action Plan

### *LEA will:*

- Immediately begin implementation of the approved CAP in order to meet the regulatory requirements of IDEA of 100 percent compliance;
- Submit a sample of records to provide evidence of systemic correction that demonstrates that the changes in the LEA system have yielded significantly improved outcomes for children with disabilities in the focused area as soon as possible, but no later than one year from the date of the Summary Report indicating the noncompliant findings.

### The SST will:

- Contact district to plan SST's involvement in implementation of activities;
- Communicate with district to remind them of due dates;
- Communicate with district monthly to determine progress;
- Assist district with documenting their progress toward completing activities on a monthly basis so district can meet quarterly benchmarks;
- Document involvement with implementation of CAP activities on a monthly basis.

### *After LEA implementation of the CAP, OEC will:*

- Review a sample number of records to verify that the LEA is now correctly implementing the specific regulatory requirements (100 percent compliance) cited in the LEA's Summary Report (approximately 9 months from date of summary report);
- Send the LEA a clearance letter, once OEC verifies findings in all sections of the review are corrected and completed at 100%;
- Maintain an open finding of non-compliance for the LEA, if correction is not completed at 100%;
- Address on-going non-compliance resulting in consequences related to OEC's policy for progressive sanctions (See Appendix vi).

## Verification of Correction and Implementation of Regulatory Requirements

LEAs must demonstrate that correction of non-compliance has occurred in accordance with U.S. Department of Education, Office of Special Education Programs (OSEP) Memo 09-02. This means that the LEA must demonstrate correction according to OSEP's "two-pronged test" for correction. LEAs must demonstrate both prongs (individual and systemic) of correction as soon as possible, but no later than one year from the notification of non-compliance.

**INDIVIDUAL CORRECTION (Prong 1):** LEA must correct each individual case of noncompliance; and submit verification of correction of individual cases of non-compliance to OEC within **60 school days** after receiving record review items and parent notification letters. Exception for FAPE findings: LEA will have up to **15 school days** to correct and submit evidence to OEC of completion of correction.

**SYSTEMIC CORRECTION (Prong 2):** LEA must show that it is correctly implementing the specific regulatory requirements, i.e., it has achieved 100% compliance, based on a review of updated data **within one year from the notification of non-compliance.**

## Appendix i

### LEA Checklist for Review Activities

Pre-On-site Activities	On-site Activities	Post On-site Activities
<p><b>Immediately after initial contact from OEC:</b></p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Secure an accessible location for public and individual meetings</li> <li><input type="checkbox"/> Inform OEC of location</li> <li><input type="checkbox"/> Designate an LEA lead contact for the on-site review and:               <ul style="list-style-type: none"> <li><input type="checkbox"/> Fiscal contact</li> <li><input type="checkbox"/> Gifted contact</li> <li><input type="checkbox"/> Special education contact</li> <li><input type="checkbox"/> Preschool contact</li> </ul> </li> <li><input type="checkbox"/> Access on-site review resources on ODE website</li> </ul> <p><b>4 weeks before review date:</b></p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Schedule on-site activities with OEC review team coordinator</li> </ul> <p><b>Public and Parent Meetings</b></p> <p><b>4 weeks before review date:</b></p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Mail OEC prepared parent public meeting notice to all parents of SWD</li> <li><input type="checkbox"/> Copy of notice in student file</li> <li><input type="checkbox"/> Post the parent meeting notice on the LEA website</li> </ul> <p><b>Document and Record Reviews</b></p> <p><b>2-4 weeks prior to review date:</b></p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Secure a room for OEC staff with computer hook-ups and Internet access</li> <li><input type="checkbox"/> Gather and organize all required documents/records as outlined in Appendix ii</li> <li><input type="checkbox"/> Send copies of fiscal reports (ACCRPT and FINDET) to ODE fiscal contact.</li> </ul> <p><b>LEA Interviews</b></p> <p><b>2-4 weeks before review date:</b></p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Identify location and times of interviews</li> <li><input type="checkbox"/> Schedule 90 minutes for each LEA group to be interviewed</li> <li><input type="checkbox"/> Identify, in conjunction with OEC team lead, LEA staff that will participate in interviews</li> </ul>	<p><b>Initial Onsite Meeting</b></p> <ul style="list-style-type: none"> <li><input type="checkbox"/> LEA's Cross Functional Team scheduled to meet on day 1</li> <li><input type="checkbox"/> Review OEC schedule for on-site review activities</li> <li><input type="checkbox"/> LEA Lead Contact to be available remaining days for questions</li> </ul> <p><b>Public/Individual Meetings</b></p> <ul style="list-style-type: none"> <li><input type="checkbox"/> LEA personnel will introduce OEC staff and close meeting</li> <li><input type="checkbox"/> Provide copies of "Whose IDEA is This?" at the parent meeting</li> </ul> <p><b>Document and Record Reviews</b></p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Appendix ii documents are organized and available for OEC review</li> <li><input type="checkbox"/> Selected student records are available for OEC review</li> <li><input type="checkbox"/> LEA fiscal, gifted and special education contacts available to discuss documents reviewed by OEC, as identified per on-site review schedule</li> <li><input type="checkbox"/> Provide additional LEA documentation or evidence of policies, procedures or practices as requested by OEC</li> <li><input type="checkbox"/> Verify student addresses if individual cases of non-compliance are identified</li> </ul> <p><b>LEA Interviews</b></p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Provide additional LEA documentation or evidence of policies, procedures or practices as requested by OEC</li> <li><input type="checkbox"/> 90 minute interviews with selected staff and groups</li> </ul> <p><b>Exit Meeting</b></p> <ul style="list-style-type: none"> <li><input type="checkbox"/> LEA's Cross Functional Team scheduled for exit meeting with OEC's on-site team</li> </ul> <p><b>FAPE</b></p> <ul style="list-style-type: none"> <li><input type="checkbox"/> LEA will address any FAPE issues brought to their attention by OEC during the on-site review and follow up with OEC upon completion of correction. (LEA will have up to 15 school days to correct)</li> </ul>	<p><b>FAPE Correction</b></p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Submit evidence to OEC of completion (LEA will have up to 15 school days to correct)</li> </ul> <p><b>Summary Report</b></p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Review summary report of findings (Individual and Systemic Correction)</li> <li><input type="checkbox"/> Review Record Review Items and Parent Notification Letters of non-compliance for each child</li> <li><input type="checkbox"/> Review Record Review Items that require Corrective Action Plans outlined in Summary Report</li> </ul> <p><b>Corrective Action Plan (CAP)</b></p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Meet with SST consultant and OEC Team Coordinator to develop a Corrective Action Plan after receiving summary report.</li> <li><input type="checkbox"/> Utilize SST for Technical Assistance and/or Professional Development</li> <li><input type="checkbox"/> Utilize OEC approved CAP template (located on ODE/OEC website)</li> <li><input type="checkbox"/> Develop CAP</li> <li><input type="checkbox"/> LEA's Superintendent &amp; SST consultant electronically signs cover page of CAP</li> <li><input type="checkbox"/> Submit CAP to OEC for approval within <b>30 school days</b> after receiving summary report (email)</li> </ul> <p><b>CAP Activities</b></p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Utilize SST for Technical Assistance and/or Professional Development</li> <li><input type="checkbox"/> Communicate with SST consultant and OEC consultant on CAP progress (monthly or quarterly)</li> </ul> <p><b>Individual Correction</b></p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Utilize SST for Technical Assistance and/or Professional Development</li> <li><input type="checkbox"/> Correct and submit verification of correction of Individual Findings within <b>60 school days</b> after receiving record review items and parent notification letters</li> </ul> <p><b>Systemic Correction</b></p> <p><b>Within 9 months of noncompliance notification:</b></p> <ul style="list-style-type: none"> <li><input type="checkbox"/> OEC will contact LEA to Submit <b>new sample</b> of LEA student records for verification on implementation of corrective actions in the LEA and 100 percent compliance with IDEA regulations</li> </ul>

## Appendix ii

### OEC Documents Required for On-site Review

#### Special Education School-Age Components

*Documents for review on-site:*

- Student special education records as requested by OEC Team Coordinator.
- List of special education service providers for out-of district placements, such as: private schools; correspondence schools; juvenile detention facilities; alternative education programs; adult correctional facilities; or other appropriate settings.

#### Special Education Early Childhood Components

*Documents for review on-site:*

- A number of records (usually 6-8) related to the SSID numbers ODE provides to the district before the visit.
- Records of two children who were identified and served as preschool children with disabilities in 2011-12 who moved to kindergarten in 2012-2013 and were eligible and are being served as school-age special education students.
- Student roster and records of all preschool children with disabilities enrolled continuously through the 2010-2011 and 2011-2012 school years. Records will be randomly selected on site to examine evidence of data utilized to complete the Early Childhood Outcomes Summary Form.

#### Fiscal Components

At least **two weeks before** the on-site review, send the following to the Resource Management team member:

- ACCRPT and FINDET reports showing all expenditures for IDEA Part B for the fiscal year to date.

*Documents for review on-site:*

- Evidence of Public Participation in the planning for the use IDEA Funds
- Non-payroll vouchers (identified by fiscal staff prior to review), position descriptions, license or teaching certificates, payroll time and effort documentation or semiannual certification for employees funded through IDEA fiscal year to date.
- Equipment Policy, Equipment Inventory List, Procurement Policy, Disposal Policy, Evidence of Procurement, if applicable.
- Budget ledger for expenses related to Coordinated Comprehensive Early Intervening Services (CEIS), if applicable.
- Fiscal documents related to replacement of local funds, if district used IDEA to replace local funds.

The Review On-site Tool and Quick Reference Guide are available on ODE's website: <http://www.ode.state.oh.us/GD/Templates/Pages/ODE/ODEDetail.aspx?page=3&TopicRelationID=1897&ContentID=130879&Content=131417>

***Documents that substantiate the number of children evaluated; the number of children determined to be children with disabilities; and the number of children served year to date.***

## Gifted Education Review

At least **two weeks before** the on-site review, send the following to the gifted team member:

- List of all students (SSID only) reported as being served for the current year.
- List of all students (SSID only) reported as being accelerated, sorted by type of acceleration (early entrance to kindergarten, whole grade acceleration, subject acceleration, early graduation) for the current year.

*Documents for review on-site:*

- Gifted education expenditures for 2011-2012, including a description of any contracted services.
- Current gifted identification brochure and district's list of instruments used for gifted identification. Note that these must be updated to reflect current services and tests prior to the onsite review.
- A paragraph explaining how the district assures inclusion in screening and assessment procedures for minority and disadvantaged students, children with disabilities and children for whom English is a second language.
- List of all gifted services provided by the LEA, sorted by building and grade level for the current year.
- 10 WEPs selected by OEC for review.
- One WAP selected by OEC for review from each type of acceleration: early entrance; whole grade; subject acceleration; and early graduation. For the SSIDs selected for early entrance and whole grade acceleration, please bring the Iowa Acceleration Scale Form used to evaluate those students.
- Evidence that parents and staff are informed about early entrance to kindergarten, whole grade acceleration, subject acceleration and early graduation.
- Evidence that the Iowa Acceleration Scale, Third Edition, is used (or will be used) for early entrance and whole grade acceleration.
- Any forms or procedures used by the district related to early entrance to kindergarten, whole grade acceleration, subject acceleration and early graduation.
- Copies of schedules for all gifted intervention specialist (GIS) for the current year.
- Copies of licensure for gifted coordinators and gifted intervention specialists.
- Brief description of the high quality professional development and ongoing assistance that regular education teachers who provide gifted services receive.
- Completed spreadsheet provided by OEC which confirms that each of the regular education teachers providing gifted services receives high quality professional development and ongoing assistance.
- Signed Attestation Form (Appendix iii).

## Appendix iii

### Gifted Education Attestation Form

Name of District: \_\_\_\_\_ IRN: \_\_\_\_\_

- 1a. \_\_\_\_\_ We attest that we have reviewed the Written Education Plans (WEPs) for all students receiving gifted service and found that each student receiving gifted service has a current WEP.  
 \_\_\_\_\_ In the review we discovered that \_\_\_\_\_ percent of the WEPs for students receiving gifted service were not in place.
- 1b. \_\_\_\_\_ We attest that all students receiving service from a gifted intervention specialist receive at least 225 minutes of instruction per week (grades K-5) or 240 minutes of instruction per week (grades 6-12) from the gifted intervention specialist.  
 \_\_\_\_\_ In the review we discovered that \_\_\_\_\_ percent of students receiving gifted service were not receiving the required minutes of instruction.
- 1c. \_\_\_\_\_ We attest that all general education teachers providing gifted services receive professional development in teaching gifted students, receive ongoing assistance with curriculum development and instruction from a gifted specialist and that curriculum related to gifted services is differentiated in one or more of the following ways: (a) providing access to appropriately advanced curriculum content, including replacement or extension of the regular curriculum; (b) modifying the learning process to provide an appropriate level of challenge, including the use of strategies for curriculum compacting; or, (c) modifying or replacing assignments and projects with alternatives based on the student's needs and abilities.  
 \_\_\_\_\_ In the review we discovered that \_\_\_\_\_ percent of our general education teachers providing gifted services do not meet these requirements.
2. \_\_\_\_\_ We attest that each gifted service offered in our district is available to all eligible students in each building in our district at that grade level.  
 \_\_\_\_\_ In the review we discovered that \_\_\_\_\_ percent of the gifted services offered in our district are not available in all buildings at that grade level.
3. \_\_\_\_\_ We attest that we have reviewed the Written Acceleration Plans (WAPs) for all accelerated students and found that each student has a current WAP.  
 \_\_\_\_\_ In the review we discovered that \_\_\_\_\_ percent of the WAPs for accelerated students were not in place.
4. \_\_\_\_\_ We attest that all of our staff members assigned as gifted intervention specialists spend at least 75 percent of their time providing instruction directly to gifted students and that the remainder of their time is spent on other duties related to gifted education.  
 \_\_\_\_\_ In the review we discovered that \_\_\_\_\_ percent of our staff members assigned as gifted intervention specialists do not spend at least 75 percent of their time providing instruction directly to gifted students or do not spend the remainder of their time on other duties related to gifted education.

\_\_\_\_\_  
 Signature of District Representative

\_\_\_\_\_  
 Date

If you have questions about this form, please contact one of the ODE consultants for gifted education at (614) 466-2650.

### Appendix iv: Sample Onsite Schedule

Time, Place, Activity	District Staff	Ohio Department of Education	Lead District Staff
Monday April 2, 2012 10:00 AM <ul style="list-style-type: none"> <li>• Pre-visit introductions</li> <li>• Record Review</li> <li>• Gifted</li> </ul> 3:00 PM – 4:00 PM  Elementary School <b>Room 100</b>  Address:  5:30 – 7:00 PM <ul style="list-style-type: none"> <li>• Public Meeting</li> </ul> Elementary School <b>Library</b>  Address	Superintendent  Special Education Director  Gifted  *As many of the Exit meeting staff that is available.	Program Supports, Procedural Safeguards, Gifted, Early Childhood    ,State Support Team Region	Superintendent Special Education Director
Tuesday April 3, 2012 9:00 AM <ul style="list-style-type: none"> <li>• Record Review</li> <li>• District staff interviews</li> <li>• Early Childhood</li> <li>• IDEA Fiscal Review</li> </ul> Elementary School <b>Room 100</b>  Address	, Special Education Director Treasurer: Early Childhood: (ESC) who should be in attendance? <b>Interviews:</b> <b>Elementary Staff</b> Intervention Specialists, Related Service Providers, General Education Teachers Para-professionals, Other Staff <b>11:30-12:30</b> <b>Middle School Staff</b> Intervention Specialists, Related Service Providers, General Education Teachers Para-professionals, Other Staff <b>1:00-2:00</b>	Program Supports, Procedural Safeguards, Gifted, Early Childhood, Resource Management	Special Education Director
Wednesday 4, 2012 9:00 AM <ul style="list-style-type: none"> <li>• District staff interviews</li> <li>• Early Childhood</li> <li>• Fiscal</li> </ul> 1:00 PM Exit Meeting  Address  Exit Meeting  Elementary School <b>Room 100</b>	, Special Education Director <b>Interviews:</b> <b>9:30-10:30</b> <b>High School Staff</b> Intervention Specialists, Related Service Providers, General Education Teachers Para-professionals, Other Staff  <b>11:00-12:00</b> <b>Administrators</b> <b>Leadership Team</b> Superintendent, Treasurer Early Childhood: (ESC) , Gifted	Program Supports, Procedural Safeguards, Gifted, Early Childhood, Resource Management	Special Education Director

Notes:

\* Scheduling for On-site Reviews for Fiscal, Early Childhood and Gifted Reviews will vary according to logistics. (Their schedules will be jointly determined prior to the review by the LEA, OEC Team Coordinator, and OEC Fiscal/EC/Gifted Consultant)

OEC Team Coordinator will work with LEAs to adjust the number of days required to complete the on-site review in order to schedule activities that meet the needs of the LEA and OEC.

The above schedule represents an Urban District review, so a smaller district may be completed in fewer days.

## Appendix v

### Instructions for Signing and Submitting Corrective Action Plan (CAP) to ODE/OEC

To facilitate the approval process for LEA CAPs, the Ohio Department of Education (ODE), Office for Exceptional Children (OEC) designed the CAP as an Adobe .pdf form. Once your LEA has completed the CAP, it is ready for signature by the Superintendent using a self-signed digital ID.

**Note: The CAP signature page is formatted with an electronic signature process so districts do not need to print the page for signatures. Once signed electronically, the district can email it to their OEC Lead Consultant (without printing and scanning the document).**

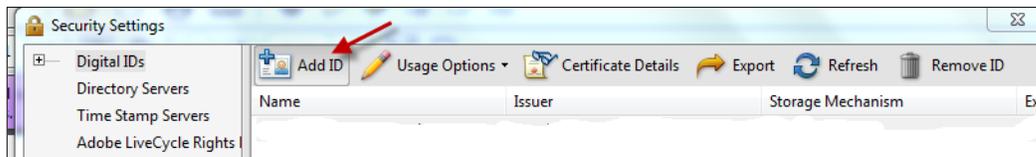
#### Create a self-signed digital ID

A *digital ID* is like an electronic driver's license or passport that proves your identity. A digital ID usually contains your name and email address, the name of the organization that issued it, a serial number, and an expiration date. Digital IDs are used for certificate security and digital signatures.

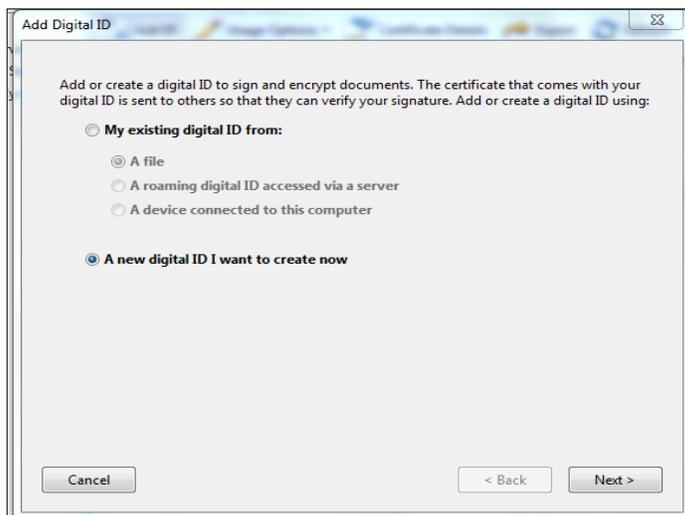
1. Do one of the following:
  - Click in the Superintendent Signature box and continue to Step 3
  - In Acrobat, choose View >Tools > Sign & Certify > More Sign & Certify > Security Settings.
  - In Reader, choose Edit > Protection > Security Settings.



2. Select Digital IDs on the left, and then click the Add ID button .



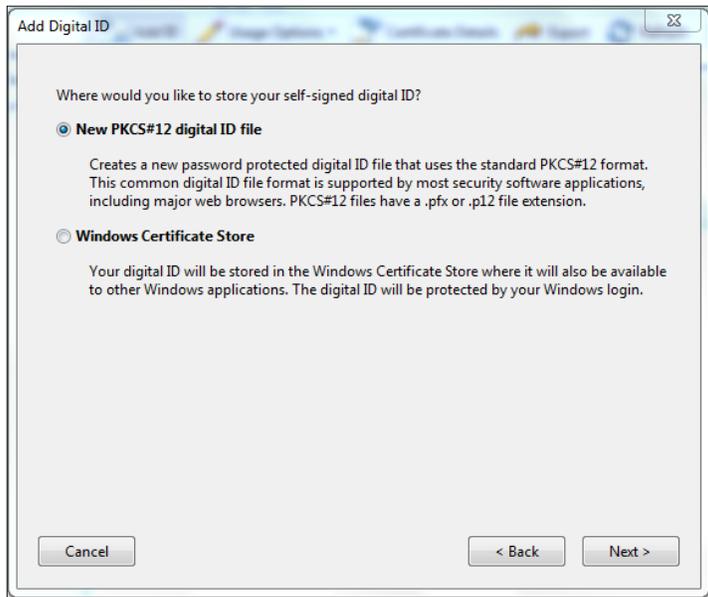
3. Select the option "A New Digital ID I Want To Create Now", and click Next.



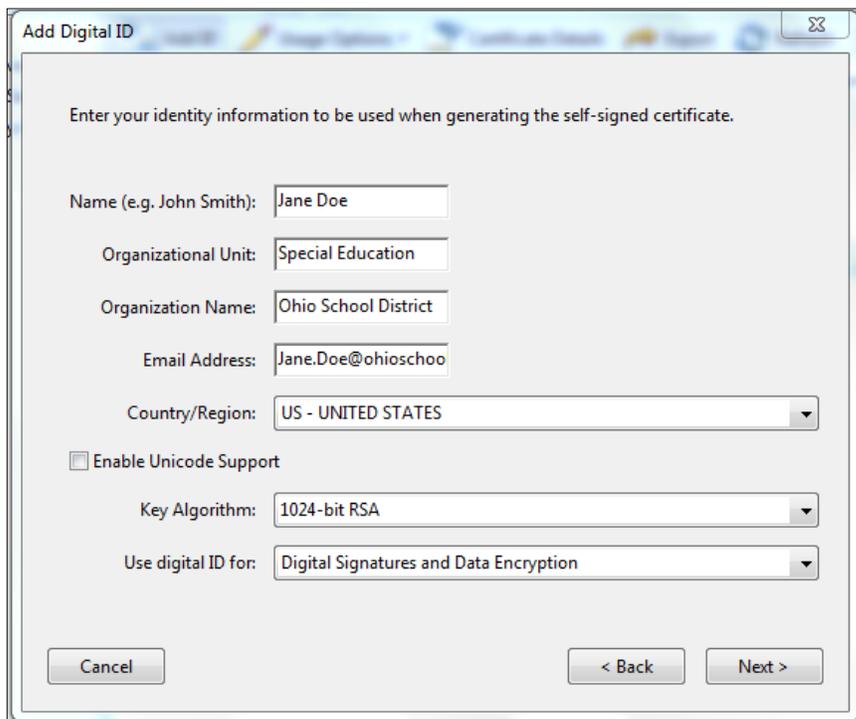
4. Specify where to store the digital ID, and click Next.

**New PKCS#12 Digital ID File:** Stores the digital ID information in a file, which has the extension .pfx in Windows and .p12 in Mac OS. You can use the files interchangeably between operating systems. If you move a file from one operating system to another, Acrobat still recognizes it.

**Windows Certificate Store (Windows only):** Stores the digital ID to a common location from where other Windows applications can also retrieve it.

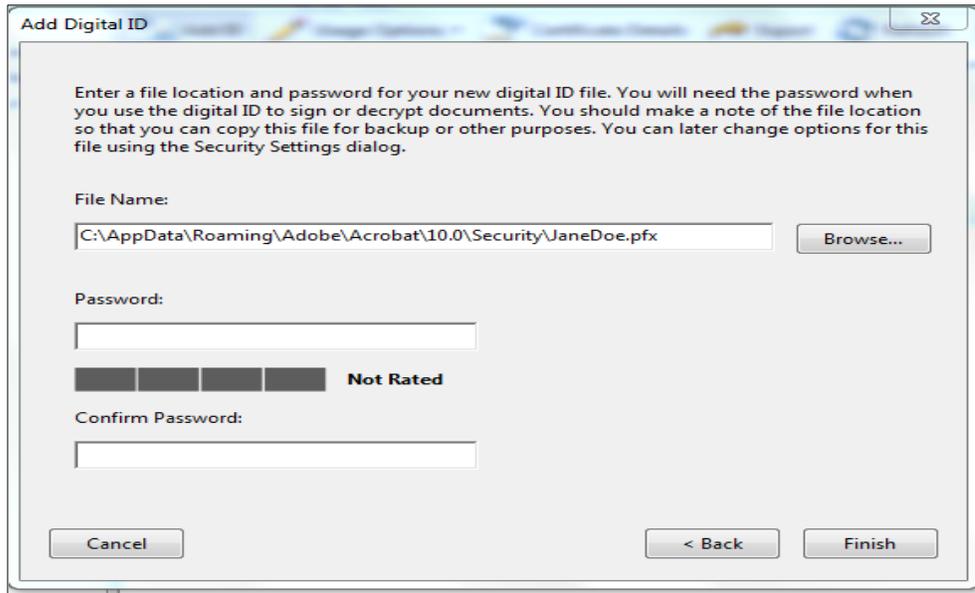


5. Type a name, email address, and other personal information for your digital ID. When you certify or sign a document, the name appears in the Signatures panel and in the Signature field.



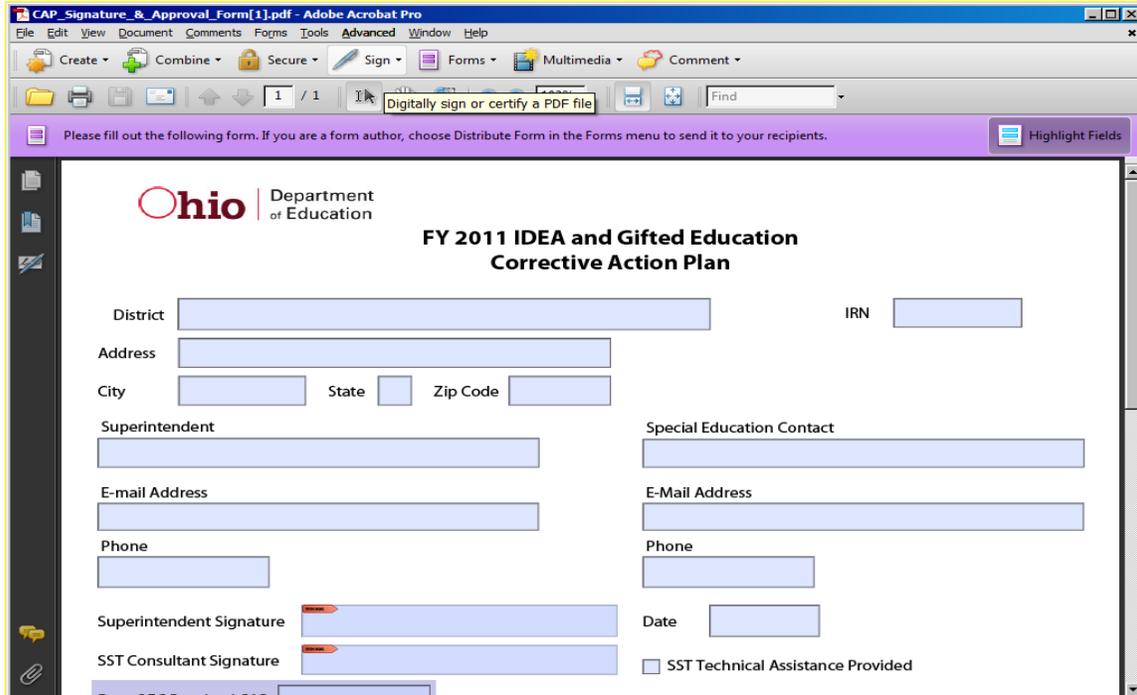
6. (Optional) To use Unicode values for extended characters, select Enable Unicode Support, and then specify Unicode values in the appropriate boxes.
7. Choose an option from the Key Algorithm menu. The 2048-bit RSA option offers more security than 1024-bit RSA, but 1024-bit RSA is more universally compatible.

8. From the Use Digital ID For menu, choose whether you want to use the digital ID for signatures, data encryption, or both.
9. Type a password for the digital ID file. For each keystroke, the password strength meter evaluates your password and indicates the password strength using color patterns. Reconfirm your password.

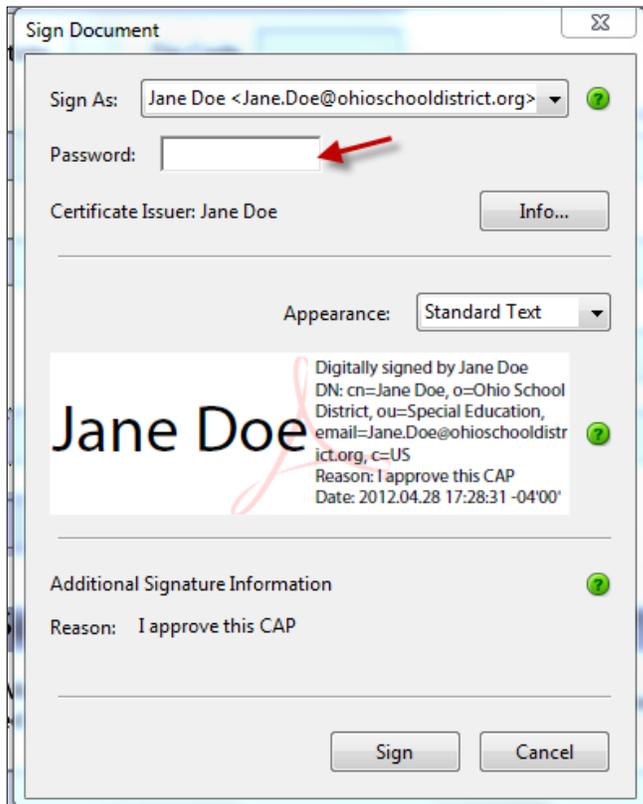


**To sign the Corrective Action Plan using your digital ID**

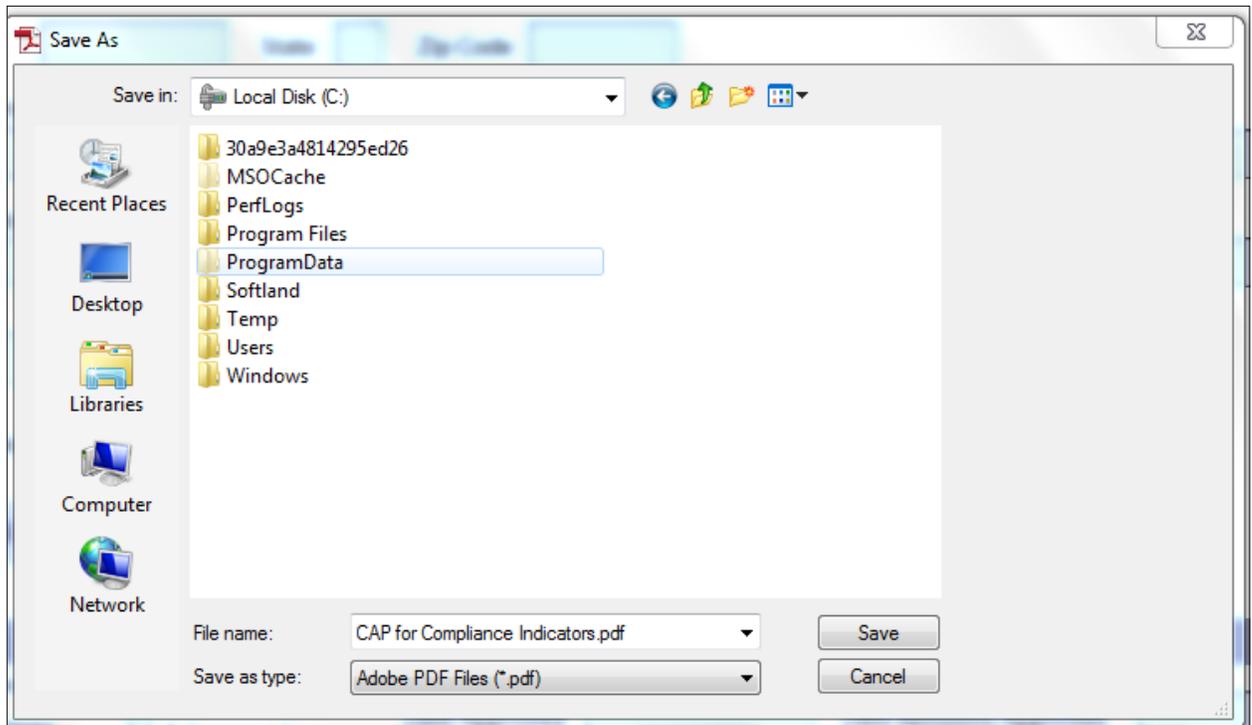
1. Click in the Superintendent Signature box



2. Enter your password and then click "Sign".



3. Save the file.



4. Attach the saved file to an email and send to your assigned ODE/OEC contact.

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## Appendix vi

### OEC System of Progressive Sanctions

The Ohio Department of Education (ODE), Office for Exceptional Children (OEC) strives to ensure all children, including students with disabilities and students identified as gifted, achieve positive educational outcomes. To accomplish this, OEC supports professional development and technical assistance provided at the state, regional, and local levels for districts and other providers. OEC also utilizes a system of progressive sanctions to help ensure compliance with state and federal regulations. This system is described next.

#### Oversight Components

Specific oversight components utilized by OEC to ensure compliance with state and federal requirements include the following:

- Special Education Focused Monitoring system, including early childhood monitoring conducted by the ODE Office of Early Learning & School Readiness
  - o On-site monitoring visits
  - o Self-assessment
- Management Assistant Reviews (MAR) & Special Education Fiscal Accountability Report
- Complaints / Due Process Hearings
- Gifted Identification and Service Provision
  - o District self-reports
  - o Identification and service data audits
  - o Unit funding eligibility monitoring
  - o Complaint investigations

#### Non-compliance

Districts identified as noncompliant will receive written notification from OEC, describing the noncompliance and the requirement to create and implement a corrective action plan. The corrective action plan will include a step-by-step process that the district will follow to address the area(s) of non-compliance, including benchmark dates for completion, as well as the method for documenting the completion of these steps.

Components of corrective action plans may include the following

Educational records review to address systemic issues discovered during a complaint investigation or during monitoring;

**Doe Consent Order, Ex. A, p. 1**

Professional development and technical assistance for district personnel, complete with records of these activities and documentation that district practices have been corrected;

Fiscal records review;

Recovery of funds by ODE to address misappropriation of either state or federal funds;

Should a district or other provider fail to meet the timeline in their corrective action plans, ODE/OEC may delay and ultimately move to withhold applicable state and/or federal funds.

### Sanction Process

When a district or other provider does not complete the required corrective activities within the required timeline, the following steps will be taken by ODE/OEC staff:

- 1) District/provider will be sent a letter signed by the OEC Director documenting its failure to comply with its corrective action plan. The letter will provide a revised benchmark date for completing the remaining items. The letter will also indicate whether and which applicable funds (state and/or federal) will be delayed should the revised benchmark dates not be met.

Applicable funds include

- i. IDEA Part-B funds (Pre-K and School-age)
  - ii. Gifted Identification funds (GRF)
  - iii. Gifted Unit funds (GRF)
  - iv. State weighted special education funds (GRF foundation funds).
- 2) Should the district/provider again fail to meet the benchmark date, it will receive a second letter, this time from the Associate Superintendent, Center for School Options and Finance, indicating which funds (state and or federal) will be delayed. The letter will also include steps the district/provider must take to secure release of these funds.
  - 3) Subsequent non-compliance will result in ODE/OEC moving to withhold or recover additional district funds after providing the opportunity for an R.C. Chapter 119 hearing.

### Authority to Implement Sanctions

The following citations outline ODE/OEC's authority to impose these sanctions:

A. Ohio Revised Code (ORC) Section 3317.01 establishes that ODE/OEC has the authority to administer and supervise the allocation and, subject to Controlling Board approval, distribution of all state payments under Chapter 3317.

**Doe Consent Order, Ex. A, p. 2**

ORC 3317.01 (C) further establishes that a board of education or governing board of an educational service center which has not conformed with other law [other than the sections of law specified in divisions (A) and (B) of ORC Section 3317.01] and the rules pursuant thereto, shall not participate in the distribution of funds authorized by sections 3317.022 to 3317.0211, 3317.11, 3317.16, 3317.17, and 3317.19 of the Revised Code, except for good and sufficient reason established to the satisfaction of the State Board of Education and the Controlling Board.

B. The Individuals with Disabilities Education Improvement Act of 2004 (IDEA 04) and the federal regulations at 34 C.F.R. Part 300 provide that the State Educational Agency (SEA) has the authority to administer and supervise the allocation and distribution of federal Part B moneys for the education of children with disabilities.

The federal law at 20 U.S.C. 1413(d), federal regulation at 34 C.F.R. 300.222, and state rule, Rule 3301-51-01(A)(8), provide that if the superintendent of public instruction, after reasonable notice and an opportunity for a hearing, finds that a state agency, school district, county board of MR/DD, or other educational agency that has been determined to be eligible under Part B of the IDEA is failing to comply with any requirement in sections 34 C.F.R. 300.201 to 34 C.F.R. 300.213:

The superintendent of public instruction must reduce or must not provide any further payment to the state agency, school district, county board of MR/DD, or other educational agency until the state superintendent is satisfied that the state agency, school district, county board of MR/DD, or other educational agency is complying with that requirement.

**Doe Consent Order, Ex. A, p. 3**

## Appendix vii

### Definitions

Following are definitions of terms encountered during IDEA review activities:

**Accountability/Interactive Local Report Card Workbooks** – This series of files and workbooks summarizes the accountability data that LEAs submit to the Ohio Department of Education (ODE) Education Management Information System (EMIS). The workbooks are designed to help LEAs and buildings understand how the data they submit will be used in calculations of achievement rates, attendance rates, graduation rates and other factors.

**Benchmarks** – These are expected levels of performance. Some benchmarks are indicated on the LEA and building Local Report Cards and include the Adequate Yearly Progress (AYP) goals associated with the *No Child Left Behind Act*.

Example: Federal AYP requirements identify a series of standards that each school and LEA must reach.

**CCIP** – The Comprehensive Continuous Improvement Plan (CCIP) is a unified grants application and verification system that consists of two parts: the Planning Tool and the Funding Application. The Planning Tool contains the goals, strategies, action steps and LEA goal amounts for all grants in the CCIP. The Funding Application contains the budget, budget details, nonpublic services and other related pages. There are six Funding Applications in the CCIP: Consolidated; Competitive; Student Intervention; Career-Technical and Adult Education; Adult Basic and Literacy Education; and Community School.

**Disaggregated Data** – Disaggregated data points are those that have been separated into components. For example, LEA data can be disaggregated to show individual building data, and student data can be separated into various demographic subgroups (e.g. LEA's current SPP Indicator data).

**Disproportionality** – This term refers to the disproportionate representation of children from various racial or ethnic groups in the areas of disability identification, restrictive educational placements and disciplinary actions.

**EMIS** – The Education Management Information System (EMIS) is the statewide data collection system for Ohio's primary and secondary education programs. Staff, student, LEA, building and financial data are collected through this system. Staff data include demographic, attendance and course information. General school LEA and school building data, including financial data, are also reported through EMIS. Demographic, attendance, program, course and test data about students are submitted to OEC.

**FAPE** — a free appropriate public education—is an entitlement of a child with a disability, as IDEA defines that term, with the IEP serving as a means by which this entitlement is mapped out. What is not immediately clear about FAPE, but what is true nonetheless, is that for each child with a disability, FAPE is different. While each child's education must be free and while a public agency provides and pays for that education, what is "appropriate" for one child will not necessarily be

appropriate for another. Determining what is appropriate for a specific child requires an individualized evaluation in which the child's strengths and weaknesses are identified in detail.

**Finding of Non-compliance** – A finding is defined as a written notification from the state to an LEA that contains the state's conclusion that the LEA is in non-compliance, and that includes the citation of the regulation and a description of the quantitative and/or qualitative data supporting the state's conclusion of non-compliance with the regulation.

**Formative Assessment** – When incorporated into classroom practice, formative assessments provide information that teachers can use to assess student understanding of grade-level content standards while instruction is occurring. This type of assessment provides information that allows the teacher to adjust instruction at a time when adjustments can enhance student learning. It also informs the student about his or her progress in mastering grade-level content standards. A formative assessment does not replace summative assessment, since the two types of assessment differ in purpose. The primary purpose of a formative assessment is to measure student understanding during instruction, while a summative assessment measures student mastery after instruction has occurred.

**Indicator** – An indicator is a data point that measures how well an LEA or the state is performing within a priority area. The State Performance Plan (SPP) includes 20 indicators designed to measure state and LEA efforts to implement the requirements and purposes of the Individuals with Disabilities Education Improvement Act of 2004 (IDEA).

Example: The performance of students with disabilities on statewide reading achievement tests is an indicator.

**Parent** - Under FERPA, a "parent" means a parent of a student and includes a natural parent, a guardian, or an individual acting as a parent in the absence of a parent or guardian. 34 CFR § 99.3 definition of "Parent." Additionally, in the case of the divorce or separation of a student's parents, schools are required to give full rights under FERPA to either parent, unless the school has been provided with evidence that there is a court order, State statute, or legally binding document relating to such matters as divorce, separation, or custody that specifically revokes these rights. 34 CFR § 99.4.

**Scientifically-Based Research** – Defined in both the *No Child Left Behind* Act of 2001 and IDEA as "research that involves the application of rigorous, systematic and objective procedures to obtain reliable and valid knowledge relevant to education activities and programs."

**Supplemental Aides and Services** – means aids, services, and other supports that are provided in regular education classes, other education-related settings, and in extracurricular and nonacademic settings, to enable children with disabilities to be educated with nondisabled children to the maximum extent appropriate.

**Summative Assessment** – Summative assessment provides a measurement of student mastery of grade-level content standards after instruction has occurred. Unlike formative assessment,

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summative assessment does not provide information that can assist teachers in making instructional adjustments during the actual learning process, but it does help measure the overall effectiveness of instructional practices and programs. Examples of summative assessments include standardized state-level assessments and interim LEA and classroom assessments, such as end-of-unit or semester exams. The results of summative assessments can be used as part of the LEA and state accountability measures, as in the case of standardized statewide assessments. They also can be used in the grading process, as in the case of LEA and classroom developed assessments.

**State Performance Plan (SPP)** – IDEA requires each state to have a Part B State Performance Plan to evaluate the state’s efforts to implement the requirements and purposes of Part B of IDEA and to describe how the state will improve such implementation. The SPP includes rigorous and measurable targets for 20 indicators.

**State Support Teams (SST)** –Ohio’s state support system includes 16 regional State Support Teams who use a connected set of tools to improve instructional practice and student performance on a continuing basis.

**Triangulation** – Also called “cross examination,” triangulation relies on more than one method in a study to double (or triple) check results. The on-site review uses a triangulation of data from public input, record reviews and staff interviews to draw conclusions. This process is referred to as “conducting evidence-based investigations.”