

Laurel Oaks Career Development Center IRN: 064972
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Ohio Department of Education, Office for Exceptional Children 2018-2019 IDEA Selective Review Summary Report

Introduction

The Ohio Department of Education's Office for Exceptional Children (OEC) would like to extend appreciation to the Laurel Oaks Career Development Center (Laurel Oaks) staff and its associate educational agency 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 October 16 and 17, 2018, 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

Laurel Oaks Career Center mailed 175 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 October 16, 2018, OEC consultants held a public meeting for parents and other interested parties. No parents or family members attended the public meeting. One State Support Team (SST) Region 14 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 received one written comment.

During the public meeting, parents would have been advised by OEC consultants of the formal complaint process under IDEA and that their public comments did not constitute a formal complaint. The participants would have been 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 26 records of students with disabilities. OEC selected records of students with disabilities from a variety of disability categories and grade levels. Eight student records were selected for IEP verification in the classroom setting.

4. Staff/Administrative Interviews

On October 16, 2018, OEC consultants held seven sessions of interviews with 34 administrators, 13 teachers, nine school counselors, and nine school psychologists from 13 associate districts. In addition, OEC consultants interviewed five Laurel Oaks/Great Oaks administrators and eight Laurel Oaks staff members. 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 to OEC by email to john.magee@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: March 6, 2019

OEC Trainings

As part of the OEC monitoring process, personnel from Laurel Oaks Career Center and its associate educational agencies 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: March 6, 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: **April 26, 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: **September 27, 2019***

For questions regarding the review, please contact: John Magee, OEC Contact Consultant, at (614) 728-1115, toll-free at (877) 644-6338, or by e-mail at john.magee@education.ohio.gov.

IDEA Noncompliance

As a result of the selective review, which consisted of record reviews, classroom observations, Laurel Oaks and associate district staff interviews, parent meetings, and an analysis of district data, procedures and student outcomes, OEC identified two areas of IDEA noncompliance by Laurel Oaks and the associate educational agencies, which are outlined below:

1. **Requirement: 34 CFR 300.17 Free appropriate public education. *Free appropriate public education or FAPE means special education and related services that—***
 - (a) Are provided at public expense, under public supervision and direction, and without charge;**
 - (b) Meet the standards of the SEA, including the requirements of this part;**
 - (c) Include an appropriate preschool, elementary school, or secondary school education in the State involved; and**
 - (d) Are provided in conformity with an individualized education program (IEP) that meets the requirements of §§ 300.320 through 300.324. (Authority: 20 U.S.C. 1401(9))**

Also see Ohio Administrative Code (OAC) 3301-51-07 (D) through (K) individualized education program (IEP).

Finding:

Students with disabilities who are entitled to specific Individualized Education Program (IEP) specially designed instruction, related services, accommodations, modifications or other supports and services often must self-advocate for those supports and services outside of the normal setting for instruction. This practice denies the provision of certain IEP supports and services, as it is the responsibility of the educational agency to provide special education and related services in accordance with the IEP, and is not the responsibility of the student to call for (advocate for) the services.

Correction:

Laurel Oaks and its associate educational agency leaders and staff must address these IDEA requirements by providing a Free Appropriate Public Education (FAPE) as documented in the student's IEP without individually changing the nature or extent of the services and supports described. All services and supports must be delivered as described by the student's IEP team and not be changed or altered to fit scheduling, staffing or other restrictions in place at Laurel Oaks. This correction must be completed as soon as possible, but no later than **May 31, 2019 or the end of the 2018-2019 school year**, whichever occurs first.

Finding:

Interview responses and record reviews confirmed that, in some cases, the amount of time for specially designed instruction was unilaterally changed at the request of Laurel Oaks personnel to fit the conditions and scheduling at the career center. This indicates predetermination of services and is not individualized to the needs of each student.

Correction:

Laurel Oaks and its associate educational agencies leaders and staff must ensure that the specially designed instruction needs of students as described in the IEP present levels and goals are addressed with an amount of time and frequency of specially designed instruction or related services that will meet these needs. It cannot be predetermined based upon personnel staffing or scheduling considerations. This correction must be completed as soon as possible, but no later than **May 31, 2019 or the end of the 2018-2019 school year**, whichever occurs first.

2. **Requirement: 34 CFR 300.201 Consistency with State policies. The LEA, in providing for the education of children with disabilities within its jurisdiction, must have in effect policies, procedures, and programs that are consistent with the State policies and procedures established under §§ 300.101 through 300.163, and §§ 300.165 through 300.174.**

OAC 3301-51-01 Applicability of requirements and definitions: (5) *Plan: Each school district, county board of DD, or other educational agency, in providing for the education of children with disabilities within its jurisdiction, must have in effect a plan, written policies and procedures, and programs that are consistent with the state's policies and procedures related to the implementation of Part B of the IDEA; and OAC 3301-51-07 (B) The county boards of developmental disabilities (county boards of DD) and other educational agencies shall adopt and implement written policies and procedures approved by the Ohio Department of Education, Office for Exceptional Children, that ensure services identified in the child's IEP are provided as agreed upon with the child's school district of residence.*

Finding:

Although Laurel Oaks has recently addressed special education policies and procedures through review and revision of these documents, the agency does not have current special education policies and procedures that have been approved by the Ohio Department of Education, Office for Exceptional Children (OEC).

Correction:

In collaboration with the Laurel Oaks associate educational agencies, Laurel Oaks must cooperatively develop, submit for OEC approval and implement special education policies and procedures addressing the enrollment of students with disabilities, and the delivery of special education supports and services for all students with disabilities enrolled in Laurel Oaks career-technical programs and processes. This correction must be completed as soon as possible, but no later than **May 31, 2019 or the end of the 2018-2019 school year**, whichever occurs first.

Other Considerations

1. **Commendation:** The Great Oaks and Laurel Oaks leadership team made recent strides to improve special education instruction, supports and services through employing additional intervention specialists to meet the needs of students with disabilities in career-technical programs. The leadership team is to be commended for these efforts, and they are encouraged to continue the enhancement of instruction, supports and services for students with disabilities in all Great Oaks programs.
2. **Communications Plan:** There is an opportunity for Laurel Oaks to strengthen partnerships and communication with associate educational agencies by focusing on the policies in place for serving students with disabilities. This may be addressed through the development and implementation of a **Laurel Oaks communications plan** which would include the revised and OEC-approved special education policies and procedures.

3. **Concern:** With the transportation restrictions on half-day participation for some students from some districts, not all students with disabilities have equal access to career-technical education at Laurel Oaks. The agency and associate educational agencies have an urgent opportunity to address this issue so that students are not denied equal access to career-technical programs offered by Laurel Oaks. This issue may be addressed in the proposed jointly developed district - Laurel Oaks communications plan and special education policies and procedures.

Requirement: 34 CFR 300.39 Special education. (a) General.

(1) Special education means specially designed instruction, at no cost to the parents, to meet the unique needs of a child with a disability, including—

(i) Instruction conducted in the classroom, in the home, in hospitals and institutions, and in other settings; and (ii) Instruction in physical education.

(2) Special education includes each of the following, if the services otherwise meet the requirements of paragraph (a)(1) of this section—

(i) Speech-language pathology services, or any other related service, if the service is considered special education rather than a related service under State standards;

(ii) Travel training; and

(iii) Vocational education [emphasis added].

34 CFR 300.110 Program options. The State must ensure that each public agency takes steps to ensure that its children with disabilities have available to them the variety of educational programs and services available to nondisabled children in the area served by the agency, including art, music, industrial arts, consumer and homemaking education, and **vocational education** [emphasis added].

4. **Concern:** There is an opportunity for Laurel Oaks to add transparency to the career-tech program application and selection process. Through interviews, it became clear that there was some confusion within the associate educational agencies concerning the application review, selection and acceptance process. The continued development and publishing of specific criteria for application to, and selection for entrance in each career tech program offered is encouraged. This also would include public access to program competencies, end of course assessment procedures, industry credential requirements/examination processes and other relevant information.

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>Laurel Oaks does not provide preschool services.</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>Seven evaluations did not appropriately document interventions provided to resolve concerns for the child performing below grade-level standards.</p> <p><u>Interviews</u></p> <p>Evaluations for entering sophomores are usually done through the home district. Reevaluations are also managed by the home district with input gathered from Laurel Oaks staff members by school psychologists from the associate schools.</p> <p><u>Other Considerations</u></p> <p>The documentation of interventions provided in the ETR is an issue in many school districts – not limited to Laurel Oaks associate districts.</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)	<p><u>Record Review</u></p> <p>Two student records did not show evidence that the parent was afforded the opportunity to participate in the evaluation team planning meeting.</p>	<p><u>Individual Correction</u></p> <p>The educational agency must provide evidence that the parent was involved or provided the opportunity to participate in the evaluation planning process.</p> <p>The evidence may include evaluation planning form, prior written notice, parent invitation, referral form or communication log.</p> <p>If the 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.</p> <p><u>Systemic Correction</u></p> <p>The educational agency must submit evidence to OEC of written procedures and practices that include the parent in the evaluation planning 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>
CF-4	300.300	<p><u>Record Review</u></p> <p>Six student records did not provide evidence of parental consent obtained prior to new testing.</p> <p><u>Other Considerations</u></p> <p>Some records did not document parent consent, or the ETR planning for assessment was changed after the parent granted written, informed consent.</p>	<p><u>Individual Correction</u></p> <p>None</p> <p><u>Systemic Correction</u></p> <p>The educational agency must submit evidence to OEC of written procedures and practices for obtaining parental consent obtained prior to new testing.</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	
CF-5	300.304(c)(4) 3301-51-01 3301-51-06 (E)(2)(a)	<p><u>Record Review</u></p> <p>Seventeen (17) evaluations did not provide evidence that the evaluation addresses all areas related to the suspected disability.</p> <p><u>Other Considerations</u></p> <p>In several cases, assessments included on the planning form were not presented in part 1 of the ETR, and in other cases, assessments were reported in part 1 that were not included on the planning form.</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>
CF-6	300.306(c)	<p><u>Record Review</u></p> <p>Eleven (11) evaluations did not show evidence of clearly stating the summary of assessment results.</p> <p><u>Other Considerations</u></p> <p>ETR part 2 summaries of assessment results were sometimes no more than a copy and paste from all part 1 assessment reports, and not summarized; while in other cases they lacked specificity or omitted areas of concern from part 1.</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>Five 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 education needs in some ETRs was minimal and not appropriately individualized. These did not provide sufficient information to IEP teams needed to develop effective IEPs. Some descriptions left out relevant information related to the reported assessments.</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"/> 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	
CF-8	300.306(c)	<p><u>Record Review</u></p> <p>Twelve (12) evaluation team reports did not contain specific implications for instruction and progress monitoring.</p> <p><u>Other Considerations</u></p> <p>Often the implications portion was not specific to the individual student and left out any reference to 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>	<p><input checked="" type="checkbox"/> Yes</p> <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>Four 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>Other Considerations</u></p> <p>At times there was no indication that the district representative, parent, intervention specialist or general education teacher attended the ETR meeting as required.</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>	<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>

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>Eighteen (18) 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"> 1. There are appropriate measurable postsecondary goal(s). 2. The postsecondary goals are updated annually. 3. The postsecondary goals were based on age appropriate transition assessment (AATA). 4. There are transition services that will reasonably enable the student to meet the postsecondary goal(s). 5. The transition services include courses of study that will reasonably enable the student to meet the postsecondary goal(s). 6. The annual goal(s) are related to the student's transition service needs. 7. There is evidence the student was invited to the IEP Team Meeting where transition services were discussed. 8. When appropriate, there is evidence that a representative of any participating agency was invited to the IEP Team Meeting. <p><u>Interviews</u></p> <p>Transition plans for incoming students are typically completed by the home school, while transition planning for seniors and beyond are updated by the CTC staff, and take into account specific program needs and post-school career intentions.</p>	<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	
		<p><u>Other Considerations</u></p> <p>In many cases, age appropriate transition assessments (AATA) lack focus on the individual student's needs related to post-school goals in education/training, employment and independent living. In addition, transition services are often generic in nature and not developed to address student needs as identified in the AATA.</p>		
DS-2	300.320(a)(1)	<p><u>Record Review</u></p> <p>Sixteen (16) 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 present levels in the IEPs reviewed were inconsistent in quality and content. Measurable baseline data were missing in many cases. Given that IEPs are often reviewed by the district and career center personnel prior to a student entering a career tech program at Laurel Oaks, an internal monitoring and review system would be very helpful to promote compliance in present levels.</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"> • A summary of current daily academic/behavior and/or functional performance (strengths and needs); and comparison to grade-level expectations. • Baseline data provided for developing a measurable goal. <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>	<input checked="" type="checkbox"/> Yes <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>Two 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>	<input checked="" type="checkbox"/> No <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>Often functional needs were described in the ETR or IEP profile section, but were not addressed in goals or other services or supports. The IEP team may prioritize when addressing student needs, but identified needs may not be ignored.</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>	<p><input checked="" type="checkbox"/> Yes</p> <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>Fourteen (14) IEPs did not contain measurable annual goals.</p> <p><u>Other Considerations</u></p> <p>Measurable goals in the IEPs reviewed were inconsistent in quality and content. Often one or more required elements were missing. Given that IEPs are reviewed by district and CTC personnel prior to a student entering a career tech program at Laurel Oaks, an internal monitoring and review system would be very helpful to promote compliance in annual IEP 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"> 1. Clearly <u>defined behavior</u>: the specific action the child will be expected to perform. 2. The <u>condition</u> (situation, setting or given material) under which the behavior is to be performed. 3. <u>Performance criteria</u> desired: the level the child must demonstrate for mastery and the number of times the child must demonstrate the skill or behavior. <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>	<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-6	3301-51-07(B) and (C) 3301-51-07(L) 3301-51-07 (H)(1)(d)	<p><u>Record Review</u></p> <p>Nine IEPs did not show evidence that data were collected and analyzed to monitor performance on each goal and objective.</p> <p><u>Other Considerations</u></p> <p>In several cases, progress monitoring had not yet begun for students at the CTC. In other examples, the monitoring data did not reflect the IEP goal measurement. In addition, some goal measurements were vague in nature, and progress monitoring was outdated or incomplete. Parent input indicated that communication on student progress was lacking in some cases.</p>	<p><u>Individual Correction</u></p> <p>None</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 data were collected and analyzed to determine the present levels of academic and functional performance the student made on each goal and objective.</p>	<p><input checked="" type="checkbox"/> Yes</p> <p>The educational agency needs to address this finding in a Corrective Action Plan.</p>
DS-7	300.320(a)(4) 3301-51-07 (H)(1)(e)(i)	<p><u>Record Review</u></p> <p>Six IEPs did not contain a statement of specially designed instruction that addresses the individual needs of the child and supports the annual goals.</p> <p><u>Interviews</u></p> <p>Interviews confirmed that, in some cases, IEPs are changed to fit the circumstances in place at the career center, and not directly focused on the needs of the student. In some instances, specially designed instruction was generic in nature and did not address the individual needs described in the goal and present levels.</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 specially designed instruction, as appropriate, to address 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 determining specially designed instruction.</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>
DS-8	3301-51-07(L)(2)	<p><u>Record Review</u></p> <p>Four IEPs did not contain measurable annual goals and services/placement consistent with progress made.</p>	<p><u>Individual Correction</u></p> <p>None</p> <p><u>Systemic Correction</u></p> <p>The educational agency must submit evidence to OEC of written procedures and practices regarding measurable annual goals and services consistent with progress made.</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-9	300.320(a)(7) 3301-51-07 (H)(1)(i)	<u>Record Review</u> Three 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> One IEP did not indicate the amount of time and frequency of the specially designed instruction.	<u>Individual Correction</u> The educational agency must reconvene the team of the IEP 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> One IEP did not identify related services that address the needs of the child and support the annual goals. <u>Interviews</u> Interviews confirmed that related services are not provided at the career center, unless the home district opts to send a provider to Laurel Oaks, or the student is brought back to the home school to receive these services.	<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 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	
		<u>Other Considerations</u> The delivery of related services based upon student need must be addressed by Laurel Oaks and the associate educational agencies. An IEP service cannot be removed or omitted to fit the circumstances of enrollment in a career-tech program.		
DS-12	300.320(a)(7) 3301-51-07 (H)(1)(i)	<u>Record Review</u> The IEPs reviewed did not have related services. (See above)	<u>Individual Correction</u> NA <u>Systemic Correction</u> NA	<input checked="" type="checkbox"/> NA
DS-13	300.320(a)(7) 3301-51-07 (H)(1)(i)	<u>Record Review</u> The IEPs reviewed did not have related services. (See above)	<u>Individual Correction</u> NA <u>Systemic Correction</u> NA	<input checked="" type="checkbox"/> NA
DS-14	3301-51-07	<u>IEP Verification</u> Of the 26 IEPs reviewed, OEC conducted eight IEP Verifications in the classroom setting. All eight verification visits provided evidence that the IEPs were being implemented as written. <u>Other Considerations</u> It was evident in classroom walk-throughs that instructors were providing high quality instruction to all students whether they were a student with a disability or not. Instructors were clearly invested in their students' success, and knew their individual academic and social needs. Content and instruction were differentiated for all students, and all students were invested and engaged in the instruction being delivered.	<u>Individual Correction</u> NA <u>Systemic Correction</u> NA	<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-15	3301-51-07(L)	<p><u>Record Review</u></p> <p>Two IEPs did not show evidence that revisions were made based on data indicating changes in student needs or abilities.</p> <p><u>Other Considerations</u></p> <p>Some revisions were based upon career-tech program needs, and not based upon individual student needs.</p>	<p><u>Individual Correction</u></p> <p>The educational agency must reconvene the teams to review and amend the IEPs to reflect changes made based on current needs or abilities.</p> <p><u>Systemic Correction</u></p> <p>The educational agency must submit evidence to OEC of written procedures and practices regarding the use of data to revise IEPs based on changes in student needs or abilities.</p>	<input checked="" type="checkbox"/> Yes <p>The educational agency needs to address this finding in a Corrective Action Plan.</p>
DS-16	300.324(a)(2)(v) 3301-51-01(B)(3)	<p><u>Record Review</u></p> <p>All applicable IEPs reviewed identified assistive technology to enable the child to be involved and make progress in the general education curriculum.</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-17	300.320(a)(6)(i) 3301-51-07(H)(1)(g)	<p><u>Record Review</u></p> <p>Three IEPs did not identify accommodations provided to enable the child to be involved and make progress in the general education curriculum.</p> <p><u>Other Considerations</u></p> <p>Parent input established that accommodations are not always being provided as required in the IEP. When they are provided, they may be situational only and not regularly provided.</p>	<p><u>Individual Correction</u></p> <p>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.</p> <p><u>Systemic Correction</u></p> <p>The educational agency must submit evidence to OEC of written procedures and practices regarding accommodations.</p>	<input checked="" type="checkbox"/> No <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-18	300.320(a)(4) 3301-51-07 (H)(1)(e)	<u>Record Review</u> One IEP 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 team of the IEP 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.
DS-19	3301-51-07 (H)(1)(h)(ii)	<u>Record Review</u> 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. Please Note: The AASCD criteria form is a required document on records written after July 1, 2018.	<u>Individual Correction</u> The educational agency must reconvene the team of the IEP 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. <u>Systemic Correction</u> The educational agency must submit evidence to OEC of written procedures and practices regarding the use and completion of the AASCD Participation Criteria form.	<input checked="" type="checkbox"/> Yes The educational agency needs to address this finding in a Corrective Action Plan.
DS-20	300.320(a)(4) 3301-51-07 (H)(1)(e)	<u>Record Review</u> All applicable IEPs reviewed identified supports for school personnel, as appropriate, to enable the child to be involved and make progress in the general education curriculum.	<u>Individual Correction</u> NA <u>Systemic Correction</u> NA	<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-21	300.321(5) 3301-51-07(l)	<u>Record Review</u> Four 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"> • 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, and • 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 attend the IEP meeting, or • Reconvene the IEP team to review the IEP with all required members present. <u>Systemic Correction</u> The educational agency must submit evidence to OEC of written procedures and practices regarding the involvement of staff 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>Fifteen (15) 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>Interviews</u></p> <p>Various interviews made it clear that a continuum of alternative placements, as required by IDEA, is not always available at the career center. If a student needs a more restrictive placement – one that is not available at Laurel Oaks – it becomes the responsibility of the district of residence to provide an intervention specialist for their students at the CTC, or to bring the student back to the home school for a half day to receive the services. If half-day transportation is not available from the district, the student has no option but to withdraw from the career center and return to the home school full-time. This is a non-compliant limiting of access to career technical education for students with disabilities, and must be addressed by the associate districts and career center leadership.</p> <p><u>Other Considerations</u></p> <p>Some LRE statements mentioned the opportunity to come to the resource area for accommodations. This does not justify a placement outside of the general education setting.</p> <p>Other statements did not explain why instruction and services could not be delivered in the general education setting.</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"> • Be based on the needs of the child, not the disability. • Reflect that the team has given adequate consideration to meeting the student's needs in the general classroom with supplementary aids and services. • 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. • Describe potential harmful effects to the child or others, if applicable. <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"/> Yes</p> <p>The educational agency needs to address this finding in a Corrective Action Plan.</p>