

**Mt. Healthy City School District
IRN: 044412****Ohio Department of Education, Office for Exceptional Children
2018-2019 IDEA Monitoring Review Summary Report****Introduction**

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

The following report is a summary of the onsite review conducted by OEC on February 5 and 6, 2019, as part of its general supervision requirements under the Individuals with Disabilities Education Act (IDEA) and Am. Sub. HB1.

Overview

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

- Improve educational results and functional outcomes for all children 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 children with disabilities.

Onsite selective reviews 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

Mt. Healthy City School District mailed 325 OEC-approved letters to families of 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 posted on the ODE website.

On February 5, 2019, OEC consultants held a public meeting for parents and other interested parties. Attendees could speak to OEC representatives publicly in the meeting or provide written comments. Three parents and family members and one State Support Team (SST) Region 13 representative attended the public meeting, where two attendees made comments. Written comment forms were available before, during and after the meeting. No written comments were received.

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

2. Pre-Onsite Data Analysis

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

3. Record Review/IEP Verification

Prior to the onsite visit, OEC consultants reviewed 19 records of students with disabilities. OEC selected records of students with disabilities from a variety of disability categories and grades. Six (6) student records were selected for IEP verification in the classroom setting.

4. Staff/Administrative Interviews

On February 5, 2019, OEC consultants conducted eight sessions of interviews with six administrators and 41 teachers, paraprofessionals, school counselors, related services personnel and school psychologists. OEC interviews focused on the following review areas: Child Find; Delivery of Services; Least Restrictive Environment (LRE) and IEP alignment and Discipline.

Findings of Noncompliance

A finding is made when noncompliance is identified with ETR and/or IEP requirements. Noncompliance that is systemic in nature or that is identified in **30% or more** of the records reviewed by OEC and/or substantiated through other data sources must be included in a Corrective Action Plan (CAP) with action steps to address each of the noncompliance findings. All noncompliance identified by OEC is listed by subject area in the *Review of Findings and Educational Agency Required Actions* table and must be corrected by the educational agency as indicated in the *Evidence/Required Actions* column.

OEC provides separate written correspondence to the educational agency and the parent when action is required to correct findings of noncompliance for individual students.

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 the 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 for approval to Shauna Schramke, OEC Contact Consultant, at shauna.schramke@education.ohio.gov within 30 school days from the date of this report. If revisions are necessary, the educational agency will be required to revise and resubmit. The educational agency will be contacted by OEC and notified when the CAP has been approved.

CAP Due Date: September 20, 2019

OEC Trainings

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

Completion of LMS Training Modules Due Date: September 20, 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: November 7, 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: December 6, 2019

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

For questions regarding school-age records, please contact: Shauna Schramke, OEC Education Program Specialist, at (614) 466-5801, toll-free at (877) 644-6338, or by e-mail at shauna.schramke@education.ohio.gov.

Other Considerations:

1. Progress Monitoring: Progress Monitoring is extremely important in creating IEPs that are best suited for individual student needs. It is clear, as evidenced by discussion and interviews, that district staff know how their students are progressing and are in the habit of collecting multiple points of data regarding that progress. There is still a pattern that suggests a need for professional development with regard to what must be monitored and how that information connects to student need and the tracking of success toward annual IEP goals.
2. Response to Intervention (RTI): The spirit and energy for RTI shown by staff at Mt. Healthy City Schools is clear, and district resources are being directed to data collection, RTI training and specialized, RTI-focused personnel. Based on observations and interviews, the vision of the district's framework and implementation process is disconnected at the building-level and data collected is not being shared beyond administration. Additionally, RTI building-leaders in the district are not provided time to meet and analyze data, share instructional strategies and practices or communicate regarding the coordination of tools and effective processes. The district will need to deploy more inclusive policies and processes regarding their vision of RTI (formulated framework, practices, professional development, data-based decisions, and communication protocol to all stakeholders) at a district-wide level. The district may also consider the input of professionals hired at the building-level and afford these leaders the opportunity to share their collective work and experiences with one another. When the building-level RTI leaders are permitted to hone their expertise by sharing and reflecting as a group, they will prove even more valuable to enhancing student performance. This collaboration will also serve as a chance for the district to improve the practice and expectations surrounding data collection for students with disabilities and all students, as well as bridge the communication between general and special education staff members
3. Positive Behavioral Interventions and Supports (PBIS): The need for behavior supports was a prominent topic in interviews with all staff. District administration has stated their awareness of need for professional development in this area and have mentioned embracing PBIS and Trauma-Informed Care. Interviews with staff have revealed a supportive culture and general readiness for fine-tuning these supports on a district-wide level.
4. Achieve Program: The Achieve Program is currently located off-campus. District administration has voiced concern that the location is not ideal, and that moving the program back into the high school building is a goal of current leadership. The district has already identified this as a worthwhile concern and OEC leadership is interested in the district's plan for integrating the students of this program back into their home school. While onsite staff seem to know and have a good rapport with their students, there are

concerns that must be addressed by the district immediately. Beyond matters of transition involving staff, students are not afforded access to the gymnasium, bathrooms are shared with the public and matters specific to the shared building can be disruptive to students' school day. As evidenced by our onsite visit, discussion with staff and record reviews, our team noted that some IEPs were reflective of the program rather than addressing individual student needs. There is also a concern that student services are sometimes contingent on insurance access and eligibility, rather than addressing individual student need. It may also benefit the district to consider allowing the Dean of this program to have a voice in matters like choosing staff and identifying professional development needs. Staff insight, district-wide PBIS initiatives and other professional development will prove invaluable to the district as they work to improve the Achieve Program.

5. Co-Teaching: District leadership values the co-teaching model, and interviews suggest that both general education and special education staff are supportive of the practice. Taking this interest and investing in a solid approach to co-teaching may prove effective for the district in multiple ways. Continuing to advance the practice of co-teaching would ensure that all teachers are provided necessary training and afforded shared planning and communication time. Co-teaching may also serve as a means to strengthen the communication between general education and special education personnel at both the classroom and administration levels, leading to greater success for all students.

Special Education School-age/Preschool Components, 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)	<u>Record Review</u> Preschool records were not reviewed.	<u>Individual Correction</u> NA <u>Systemic Correction</u> NA	<input checked="" type="checkbox"/> NA
CF-2	3301-51-06	<u>Record Review</u> One (1) school-age evaluation did not appropriately document interventions provided to resolve concerns for the child performing below grade-level standards.	<u>Individual Correction</u> OEC has verified that this student has a current ETR in place, so no additional individual correction is required. <u>Systemic Correction</u> 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.	<input checked="" type="checkbox"/> No The educational agency does <u>not</u> need to address this finding in a Corrective Action Plan.
CF-3	300.501(b)(1) 3301-51-06 (E)(2)(a)	<u>Record Review</u> Four (4) student records showed evidence that the parent was not afforded the opportunity to participate in the evaluation team planning meeting.	<u>Individual Correction</u> The educational agency must provide evidence that the parent was involved or provided the opportunity to participate in the evaluation planning process. The evidence may include evaluation planning form, prior written notice, parent invitation, referral form or communication log.	<input checked="" type="checkbox"/> No The educational agency does <u>not</u> need to address this finding in a Corrective Action Plan.

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
			<p>If the educational agency cannot provide documentation that the parent was 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> The educational agency must submit evidence to OEC of written procedures and practices that include the parent in the evaluation planning process.</p>	
CF-4	300.300	<p><u>Record Review</u> Three (3) student records provided no evidence of parental consent obtained prior to new testing.</p>	<p><u>Individual Correction</u> None</p> <p><u>Systemic Correction</u> The educational agency must submit evidence to OEC of written procedures and practices for obtaining parental consent obtained prior to new testing.</p>	<p><input checked="" type="checkbox"/> No The educational agency does <u>not</u> need to address this finding in a Corrective Action Plan.</p>
CF-5	300.304(c)(4) 3301-51-01 3301-51-06 (E)(2)(a)	<p><u>Record Review</u> Twelve (12) student evaluations did not provide evidence that the evaluation addresses all areas related to the suspected disability.</p> <p><u>Other Considerations</u> The district should be vigilant that part 1 of the ETR reflects the planning form and that all applicable evaluations are noted on the document. Additionally, please remember that all evaluations should be signed and dated by the evaluator, and observations must be conducted in the student's instructional setting.</p>	<p><u>Individual Correction</u> 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> 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 The educational agency needs to address this finding in a Corrective Action Plan.</p>

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
CF-6	300.306(c)	<p><u>Record Review</u></p> <p>Four (4) school-age evaluations did not show evidence of clearly stating the summary of assessment results.</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"/> No</p> <p>The educational agency does <u>not</u> need to address this finding in a Corrective Action Plan.</p>
CF-7	300.306(c)	<p><u>Record Review</u></p> <p>Five (5) school-age evaluation team reports did not contain a clear and succinct description of educational needs.</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>
CF-8	300.306(c)	<p><u>Record Review</u></p> <p>Five (5) school-age evaluations team reports did not contain specific implications for instruction and 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"/> 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-9	300.306(a)(1) 3301-51-01 (B)(21)	<p><u>Record Review</u></p> <p>One (1) school-age evaluation did not show evidence that a group of qualified professionals, as appropriate to the suspected disability, were involved in determining whether the child is a child with a disability as well as the child's educational needs.</p>	<p><u>Individual Correction</u></p> <p>The educational agency must provide evidence that the ETR team 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>Six (6) school age 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>Interviewers indicated that suitable post-secondary transition supports are not available to staff. It is understood that a full-time transition coordinator was recently hired by the district, but a plan that affords post-secondary transition services the attention required by law has not been finalized. In Ohio, it is mandatory that a student with a disability be provided transition services "beginning no later than the first IEP to</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>be in effect when the child turns 14 (or younger, if determined appropriate by the IEP team), and updated annually.” See 3301-51-07(H)(2). It is imperative that processes surrounding postsecondary transition services be established and prioritized.</p> <p><u>Other Considerations</u></p> <p>In some instances, reviewers found that transition goals and services would go unchanged from previous IEPs to current IEPs. Services described were often unclear and based on either undocumented AATA information or dated information from the last ETR. Additionally, students were sometimes not invited to participate in meetings that discuss their post-secondary transition services. Training and support in this area is essential.</p>		
DS-2	300.320(a)(1)	<p><u>Record Review</u></p> <p>Fourteen (14) school-age IEPs did not contain Present Levels of Academic Achievement and Functional Performance that addressed the needs of the student.</p> <p><u>Other Considerations</u></p> <p>Knowledge of present levels is important when writing an effective, individualized and actionable goal. The data must be specific, current, related to the appropriate grade-level standards and coincide with the goal’s topic and measurement.</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 present levels 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 nondisabled peers. • 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>	<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-3	300.320(a)(2)(i)	<p><u>Record Review</u></p> <p>Four (4) school-age IEPs did not contain annual goals that address the child's academic area(s) of need.</p>	<p><u>Individual Correction</u></p> <p>The educational agency must reconvene the teams of the IEPs identified as noncompliant to review and amend the IEP. Annual goals must address the academic needs of the child unless the team provides evidence that the goals were prioritized based on the severity of the needs of the child.</p> <p><u>Systemic Correction</u></p> <p>The educational agency must submit evidence to OEC of written procedures and practices regarding the IEP process of addressing identified academic needs.</p>	<p><input checked="" type="checkbox"/> No</p> <p>The educational agency does <u>not</u> need to address this finding in a Corrective Action Plan.</p>
DS-4	300.320(a)(2)(i)	<p><u>Record Review</u></p> <p>Ten (10) school-age IEPs did not contain annual goals that address the child's functional area(s) of need.</p> <p><u>Other Considerations</u></p> <p>Record reviews suggest that the district's attention to a student's functional needs in the ETR and IEP profile did not always transfer to the areas of the IEP that would permit monitoring of progress toward addressing these needs.</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>

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
DS-5	300.320(a)(2)(i)	<p><u>Record Review</u></p> <p>Fourteen (14) school-age IEPs did not contain measurable annual goals.</p> <p><u>Other Considerations</u></p> <p>In many instances, the intended instructional level of the goal was unclear or multiple expectations were written into one goal, which makes it difficult to measure. Some goals appear to be written from present level information taken directly from raw or standard scores or percentile ranks of assessments. This information, when used in isolation, leads to a goal that challenges the student to perform higher on the rank or score of the assessment but does little to provide a clear idea of the student's specific needs and strengths. While these assessments are helpful tools, they must be critically analyzed and used in concert with other measures to be useful for filling the gap between deficits and standard expectations.</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>
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>Eleven (11) school-age 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 some instances, data was not provided for some or all current goals in the IEP. In other instances, data was collected but presented vaguely and not in a way that would provide meaningful information for future instruction. In at least one record, a behavior goal was being monitored contingent upon the student's ability to "turn in" or "not lose" his own data. This is not acceptable.</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>

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
DS-7	300.320(a)(4) 3301-51-07 (H)(1)(e)(i)	<u>Record Review</u> Four (4) school-age IEPs did not contain a statement of specially designed instruction that addresses the individual needs of the child and supports the annual goals.	<u>Individual Correction</u> The educational agency must reconvene the teams of the IEPs identified as noncompliant to review and amend the specially designed instruction, as appropriate, to address the needs of the child. <u>Systemic Correction</u> The educational agency must submit evidence to OEC of written procedures and practices regarding the IEP process of determining specially designed instruction.	<input checked="" type="checkbox"/> No The educational agency does <u>not</u> need to address this finding in a Corrective Action Plan.
DS-8	3301-51-07(L)(2)	<u>Record Review</u> Two (2) school-age IEPs did not contain measurable annual goals and services/placement consistent with progress made.	<u>Individual Correction</u> None <u>Systemic Correction</u> The educational agency must submit evidence to OEC of written procedures and practices regarding measurable annual goals and services consistent with progress made.	<input checked="" type="checkbox"/> No The educational agency does <u>not</u> need to address this finding in a Corrective Action Plan.
DS-9	300.320(a)(7) 3301-51-07 (H)(1)(i)	<u>Record Review</u> All school age records indicated the location where specially designed instruction will be provided.	<u>Individual Correction</u> NA <u>Systemic Correction</u> NA	<input checked="" type="checkbox"/> NA
DS-10	300.320(a)(7) 3301-51-07 (H)(1)(i)	<u>Record Review</u> All school-age IEPs indicated the amount of time and frequency of the specially designed instruction.	<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-11	300.320(a)(4) 3301-51-07 (H)(1)(e)	<u>Record Review</u> One (1) school-age IEP did not identify related services that address the needs of the child and support the annual goals.	<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"/> No The educational agency does <u>not</u> need to address this finding in a Corrective Action Plan.
DS-12	300.320(a)(7) 3301-51-07 (H)(1)(i)	<u>Record Review</u> All school-age IEPs indicated the location where related services will be provided.	<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> One (1) school-age IEP did not indicate the amount of time, duration and frequency of the related services to be provided.	<u>Individual Correction</u> The educational agency must reconvene the team of the IEP identified as noncompliant to review and amend on the IEP the amount of time and frequency of the related services to be provided. <u>Systemic Correction</u> The educational agency must submit evidence to OEC of written procedures and practices regarding the IEP process of determining the amount and frequency of related services to be provided.	<input checked="" type="checkbox"/> No The educational agency does <u>not</u> need to address this finding in a Corrective Action Plan.
DS-14	3301-51-07	<u>IEP Verification</u> Of the 19 IEPs reviewed, OEC conducted six (6) IEP Verifications in the classroom setting. All IEP Verifications provided evidence that the IEPs are being implemented as written.	<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>All school-age IEPs showed evidence that revisions were made based on data indicating changes in student needs or abilities.</p>	<p><u>Individual Correction</u></p> <p>NA</p> <p><u>Systemic Correction</u></p> <p>NA</p>	<input checked="" type="checkbox"/> NA
DS-16	300.324(a)(2)(v) 3301-51-01(B)(3)	<p><u>Record Review</u></p> <p>Two (2) school-age IEPs did not identify assistive technology to enable the student to be involved and make progress in the general education curriculum.</p> <p><u>Other Considerations</u></p> <p>In both instances, Assistive Technology was mentioned in the IEP profile and/or recent ETR but not included in section 7 of the IEP. It is important to include that information in section 7.</p>	<p><u>Individual Correction</u></p> <p>The educational agency must reconvene the teams of the IEPs identified as noncompliant to review assistive technology and/or services that would directly assist the child with a disability to increase, maintain, or improve their functional capabilities and include them on the IEP.</p> <p><u>Systemic Correction</u></p> <p>The educational agency must submit evidence to OEC of written procedures and practices regarding assistive technology.</p>	<input checked="" type="checkbox"/> Yes The educational agency needs to address this finding in a Corrective Action Plan.
DS-17	300.320(a)(6)(i) 3301-51-07(H)(1)(g)	<p><u>Record Review</u></p> <p>Four (4) school-age IEPs did not identify accommodations provided to enable the child to be involved and make progress in the general education curriculum.</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 The educational agency does <u>not</u> need to address this finding in a Corrective Action Plan.

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
DS-18	300.320(a)(4) 3301-51-07 (H)(1)(e)	<u>Record Review</u> Two (2) school-age IEPs did not identify modifications to enable the child to be involved and make progress in the general education curriculum.	<u>Individual Correction</u> The educational agency must reconvene the teams of the IEPs identified as noncompliant to review the modifications that would alter the amount or complexity of grade-level materials and would enable the child to be involved and make progress in the general education curriculum and include them in the IEP <u>Systemic Correction</u> The educational agency must submit evidence to OEC of written procedures and practices regarding modifications.	<input checked="" type="checkbox"/> No The educational agency does <u>not</u> need to address this finding in a Corrective Action Plan.
DS-19	3301-51-07 (H)(1)(h)(ii)	<u>Record Review</u> All applicable student records provided evidence the AASCD Participation Criteria form was used when deciding the appropriateness of the alternate assessment for the student.	<u>Individual Correction</u> NA <u>Systemic Correction</u> NA	<input checked="" type="checkbox"/> NA
DS-20	300.320(a)(4) 3301-51-07 (H)(1)(e)	<u>Record Review</u> Two (2) school-age IEPs did not identify supports for school personnel to enable the child to be involved and make progress in the general education curriculum.	<u>Individual Correction</u> The educational agency must reconvene the teams of the IEPs identified as noncompliant to review the supports for school personnel that were identified by the IEP team and define the supports on the IEP including who will provide the support and when it will take place." <u>Systemic Correction</u> The educational agency must submit evidence to OEC of written procedures and practices regarding supports for school personnel.	<input checked="" type="checkbox"/> No The educational agency does <u>not</u> need to address this finding in a Corrective Action Plan.

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
DS-21	300.321(5) 3301-51-07(l)	<u>Record Review</u> One (1) school-age IEP did not indicate that the IEP Team included a group of qualified professionals.	<u>Individual Correction</u> For the IEP 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 be in attendance at 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 people qualified to interpret the instructional implications of evaluation results in the IEP process.	<input checked="" type="checkbox"/> No The educational agency does <u>not</u> need to address this finding in a Corrective Action Plan.

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

Each educational agency shall ensure that to the maximum extent appropriate, children with disabilities, including children in public or nonpublic institutions or other care facilities, are educated with children who are nondisabled; and that a continuum of alternative placements is available to meet the needs of children with disabilities for special education and related services.

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
LRE-1	300.114 300.320(a)(5) 3301-51-07 (H)(1)(f)	<p><u>Record Review</u></p> <p>Four (4) school-age IEPs did not include an explanation of the extent to which the child will not participate with nondisabled children in the general education classroom.</p>	<p><u>Individual Correction</u></p> <p>The educational agency must reconvene the teams of the IEPs identified as noncompliant to review and include a justification as to why the child was removed from the general education classroom.</p> <p>The justification should:</p> <ul style="list-style-type: none"> • 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"/> No</p> <p>The educational agency does <u>not</u> need to address this finding in a Corrective Action Plan.</p>