

2/10/2014

Nelsonville-York City School District IRN 044446

Ohio Department of Education, Office for Exceptional Children 2013-2014 Onsite Review Summary Report

Introduction

The Ohio Department of Education's Office for Exceptional Children would like to extend appreciation to the district staff for their efforts, attention and time committed to the completion of the review processes.

The following report is a summary of the onsite reviews conducted between November 13 and 20, 2013 by the Ohio Department of Education's Office for Exceptional Children (OEC) and Office of Early Learning and School Readiness (OEL&SR) as part of its general supervision requirements under the Individuals with Disabilities Education Act (IDEA) and Am. Sub. HB1. The onsite visit consisted of the following reviews:

- IDEA Review (Special Education School Age and Special Education Early Childhood)
- IDEA Fiscal Review

IDEA Review

Overview

Educational consultants from the Office for Exceptional Children (OEC) conducted IDEA review activities on November 19 and 20, 2013. During the IDEA Review, OEC consultants monitor the LEA's implementation of IDEA to ensure compliance. The primary focus of the IDEA Review is to:

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

OEC focused the review on the following areas:

- Child Find;
- Delivery of Services;
- Least Restrictive Environment;
- Discipline

Data Sources

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

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

On November 12, 2013, Nelsonville-York School District sent 223 OEC approved letters to all families with students with disabilities in the district. OEC provided the district with a public meeting announcement for inclusion on its website or newsletter. The district posted the information regarding the meeting date on the school website- the Athens Messenger.

On November 19, 2013, OEC consultants held a public meeting for parents and other interested parties. Public parent meeting dates for all districts selected for IDEA Reviews are posted on the ODE website. No parents or family members attended the public meeting. One State Support Team (SST) Region 16 representative attended the public meeting. Attendees could speak to OEC representatives publicly in the meeting or individually, provide written comments, or both. Written comment forms were available before, during and after the meeting. OEC received zero written comments.

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 also 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. "Whose IDEA Is This?" Ohio's procedural safeguards notice, was available for participants who wanted a copy.

2. Pre-Onsite Data Analysis

OEC and SST consultants reviewed district, building and grade level data. District data analyzed included the Special Education Performance Profile, Local Report Cards, and Education Management Information System (EMIS) data. The data analysis assists OEC in determining potential growth areas and district strengths.

3. Record Review

In November of 2013, OEC consultants reviewed 25 records of school age students with disabilities. An OEL&SR consultant reviewed five records as part of the Early Childhood Special Education Review. OEC selected records of a variety of children with disabilities from three buildings.

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

4. Staff/Administrative Interviews

On November 19 and 20, 2013, OEC consultants held four sessions of interviews with four administrators and nineteen (19) teachers, school counselors, related services personnel and school psychologists. OEC interviews focused on the following review areas: Child Find; Delivery of Services; Least Restrictive Environment (LRE) and IEP alignment; and Discipline.

Findings

A finding is made when noncompliance with a specific IDEA requirement is identified through the processes outlined above. All findings of noncompliance must be corrected as soon as possible, but no later than one year from the date of this report.

OEC provides separate written correspondence to the school district and the parent/guardian when action is required to correct findings of non-compliance for individual students.

Noncompliance that is identified in **30% or more** of the records reviewed by OEC and substantiated through other data sources must be included in a comprehensive corrective action plan (CAP) with action steps to address each of the noncompliance findings.

All noncompliance identified by OEC as part of the IDEA review, listed by subject area within this report in the *Review of Findings and District Required Actions* table, must be corrected as set forth below.

Corrective Action Plan (CAP)

The Review of Findings and District Required Actions identifies the noncompliance which must be addressed in the corrective action plan developed by the Nelsonville-York School District. An approved form for the corrective action plan will be provided by OEC or can be accessed on ODE's web site by using the keyword search "OEC Corrective Action Plan". The corrective action plan developed by the district must include the following:

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

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

The district must submit the corrective action plan to Stephanie Falor, OEC Lead Consultant at Stephanie.Falor@education.ohio.gov within 30 school days from the date of this report. OEC will review the action plan submitted by the district for approval. If OEC deems that a revision(s) is necessary, the district will be required to revise and resubmit. The district will be contacted by the OEC Lead Consultant and notified when the action plan has been approved.

CAP Due Date: March 24, 2014

Individual Correction

The district has 60 school days of the issuance of the letter of findings to correct all identified findings of non-compliance for individual students, unless noted otherwise in the report.

Individual Correction Due Date: May 7, 2014

Systemic Correction

The district must correct any noncompliant policies, procedures and/or practices identified through the onsite review. OEC will verify through follow-up review of new data that the noncompliant policies, procedures and/or practices have been revised and the district is correctly implementing the regulatory requirements of IDEA. The follow-up review of new data will include review of individual student records and may include parent/staff/administrative interviews, as needed.

Systemic Correction Due Date: February 9, 2015

For questions about specific components of this report please contact:

- **Special Education School Age:** Stephanie Falor, Educational Consultant, at (614) 387-2236, toll-free at (877) 644-6338, or by e-mail at Stephanie.Falor@education.ohio.gov.
- **Special Education Early Childhood:** Connie Prairie, Educational Consultant, at (614) 995-9934, toll-free at (877) 644-6338, or by e-mail at Connie.Prairie@education.ohio.gov.
- **Fiscal:** Paul Sogan, Educational Consultant, at (614) 728-2098, toll-free at (877) 644-6338, or by e-mail at Paul.Sogan@education.ohio.gov.

<u>Special Education School Age/Preschool Components, OEC's Review Findings, and District Required Actions</u>

Component 1: Child Find

Each school district shall adopt and implement written policies and procedures approved by the Ohio Department of Education, Office for Exceptional Children, that ensure all children with disabilities residing within the district, regardless of the severity of their disability, and who are in need of special education and related services are identified, located, and evaluated as required by the Individuals with Disabilities Education Improvement Act of 2004 and Federal Regulations at 34 C.F.R. Part 300 pertaining to child find, including the regulations at 34 C.F.R. 300.111 and 300.646 and Rule 3301-51-03 of the Operating Standards for Ohio Educational Agencies serving Children with Disabilities.

Record	Regulation 34		Evidence of Correction	Must be
Review Item	CFR or OAC	Evidence of Findings	Required Actions	addressed in CAP
CF-1	300.303(b)(2)	Record Review	Individual Correction	⊠ NA
		All reevaluation records indicated that the child's reevaluation was completed within the three year timeline.	None Systemic Correction None	
CF-2	300.305(a)	Record Review All preschool evaluation records of children transitioning from Part C, utilized child information from the Individual Family Service Plan (IFSP) and other documentation provided by Help Me Grow in suspecting or when determining eligibility for Part B supports and services.	Individual Correction None Systemic Correction None	⊠ NA
CF-3	OAC 3301-51-06 (2) and OAC 3301-51- 06(4)	Record Review Two school age initial evaluations did not appropriately document interventions provided to resolve concerns for the child performing below grade-level standards. Interviews Staff shared an IAT sample folder that was well organized and documented interventions used. It is recommended that the district unify this method district wide.	IEP in place, so no additional individual correction is required. Systemic Correction The district must submit evidence to OEC of written procedures and practices in place regarding	Yes A Corrective Action Plan is required due to meeting the 30% threshold of non-compliance.

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction Required Actions	Must be addressed in CAP
CF-4	300.501(b)(1)	Record Review Eighteen (18) school age and two preschool student records did not show evidence that the evaluation planning team included the parent. Interviews The recently hired school psychologist has helped to improve the evaluation process and documentation. Other Considerations This district has begun a process to include the planning form prior to starting an evaluation process.	Individual Correction The district must provide evidence that the parent was involved or provided the opportunity to participate (multiple documented attempts) in the evaluation planning process. The evidence may include; evaluation planning form, prior written notice, parent invitation, referral form or communication log. If the district cannot provide documentation that the parent was involved or provided the opportunity to participate in the evaluation planning process, the district must conduct evaluation planning with the parent. Systemic Correction The district must submit evidence to OEC of written procedures and practices in place regarding the evaluation planning process to include the parent. OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.	Yes A Corrective Action Plan is required due to meeting the 30% threshold of non-compliance.
CF-5	300.304(c)(4); OAC 3301-51-01; and OAC 3301- 51-06	Record Review Five school age and five preschool student evaluations did not provide evidence that the evaluation addresses all areas related to the suspected disability. Other Considerations It would be efficient for the district to directly connect the IAT generated folder/information to the ETR process.	Individual Correction The district will convene the ETR teams to conduct reevaluations and provide evidence that the evaluations address all areas related to the suspected disability. Systemic Correction The district must submit evidence to OEC of written procedures and practices in place to provide evidence that the evaluation addresses all areas related to the suspected disability. OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.	X Yes A Corrective Action Plan is required due to meeting the 30% threshold of non-compliance.

Record Review	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction Required Actions	Must be addressed in
CF-6	300.306(a)(1)	Record Review Three school age and three preschool students initial 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.	Individual Correction The district must provide evidence that a group of qualified professionals participated in the eligibility determination. If not, the IEP team must reconvene the ETR meeting and provide OEC evidence of group participation. A group of qualified professionals includes the following, but is not limited to: • Parent • Additional group members: • The child's regular education teacher; or a regular classroom teacher qualified to teach a child of his or her age; or • For a preschool child an individual qualified by the SEA to teach a child of his or her age; and • At least one person qualified to conduct individual diagnostic examinations of children. Systemic Correction The district must submit evidence to OEC of written procedures and practices in place regarding the eligibility determination process. OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.	Yes A Corrective Action Plan is required due to meeting the 30% threshold of non-compliance.

Record Review	Regulation 34	Evidence of Findings	Evidence of Correction	Must be addressed in
Item	CFR or OAC		Required Actions	CAP
CF-7	300.306(a)(1); 300.305(a); and 3301-51-01 (B)(21)	Record Review Twelve (12) school age reevaluations 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. Interviews Interviews revealed the need to create a district wide approach to document parental contact. Many contacts with parents are not being documented. The district offers a variety of ways in which parents and teachers communicate; emails, phone calls, home/community visits.	Individual Correction The district must provide evidence that the IEP team and other qualified professionals participated in the eligibility determination. If not, the IEP team must reconvene the ETR meeting and provide OEC evidence of group participation. IEP Team Members include, but are not limited to: 1. Parent 2. Regular Education Teacher 3. Special Education Provider 4. District Representative 5. An individual who can interpret the instructional implications of evaluation results, 6. At the discretion of the parent or school district, other individuals who have knowledge or special expertise regarding the child, including related services personnel as appropriate; 7. Whenever appropriate, the child with a disability. Systemic Correction The district must submit evidence to OEC of written procedures and practices in place regarding the eligibility determination process.	Yes A Corrective Action Plan is required due to meeting the 30% threshold of non-compliance.
			OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.	

Component 2: Delivery of Services

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

Record	Regulation 34	od in accordance was ecc. See amough coc. See	Evidence of Correction	Must be
Review Item	CFR or OAC	Evidence of Findings	Required Actions	addressed in CAP
Review Item DS-1 DS-2		Record Review Eight school age IEPs did not show evidence that the secondary transition plan reported in EMIS during 2011-2012 was in place that meets all 8 required elements of IDEA for the student, specifically in the following area(s): 1. There are appropriate measurable postsecondary goal(s). 2. The postsecondary goals are updated annually. 3. The postsecondary goals were based on age appropriate transition assessment. 4. There are transition services that will reasonably enable the student to meet the postsecondary goal(s). 5. The transition services include courses of study that will reasonably enable the student to meet the postsecondary goal(s).	•	A Corrective Action Plan is required due to meeting the 30% threshold of non-compliance.
		 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. 		

Record Review	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction Required Actions	Must be addressed in CAP
DS-3	300.320(a)(1)	Record Review Thirteen (13) school age and five preschool student IEPs did not contain Present Levels of Academic Achievement and Functional Performance (PLOP) that addressed the needs of the student. Interviews We discussed the need to focus on current student performance, use of data through their short cycle assessments, and how their performance compares to typical peers.	Individual Correction The district must reconvene the IEP teams of the 18 IEPs identified as noncompliant to review and amend the PLOP related to each goal to include: • A summary of current daily academic/behavior and/or functional performance (strengths and needs); • Baseline data provided for developing a measurable goal. • For preschool, the PLOP should relate to the child's developmental domains, functional performance and pre-academic skills. Systemic Correction The district must submit evidence to OEC of written procedures and practices in place regarding the review of current academic/functional data when writing IEPs. OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.	Yes A Corrective Action Plan is required due to meeting the 30% threshold of non-compliance.
DS-4	300.320 (a)(2)(i)(A)	Record Review One school age student IEP did not contain annual goals that address the child's academic area(s) of need. All preschool student IEPs contained annual goals that address the child's academic area(s) of need.	Individual Correction The district must reconvene the IEP team of the one IEP identified as noncompliant to review and amend the IEP to include annual goals that address the academic needs that were identified in the IEP or provide evidence that the IEP team, based on the severity of the needs of the child, decided to prioritize addressing the needs. Systemic Correction OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.	No The district does not need to address this finding in a Corrective Action Plan.

Record	Regulation 34		Evidence of Correction	Must be
Review Item	CFR or OAC	Evidence of Findings	Required Actions	addressed in CAP
DS-5 3	600.320(a)(2)(i) A)	Record Review Three school age student IEPs did not contain annual goals that address the child's functional area(s) of need. All preschool student IEPs contained annual goals that address the child's functional area(s) of need.	Individual Correction The district must reconvene the IEP teams of the three IEPs identified as noncompliant to review and amend the IEP to include annual goals that address the functional needs that were identified in the IEP or provide evidence that the IEP team, based on the severity of the needs of the child, decided to prioritize addressing the needs Systemic Correction OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.	No The district does not need to address this finding in a Corrective Action Plan.

Record	Regulation 34		Evidence of Correction	Must be
Review Item	CFR or OAC	Evidence of Findings	Required Actions	addressed in CAP
		Record Review Fifteen (15) school age and five preschool student IEPs did not contain measurable annual goals. Interviews The district is currently working to better develop their goal writing skills. Other Considerations The district is utilizing a new program to create their special education documentation. Instruction for all teachers was provided, however it is now recognized that all teachers (in particular general education teachers) need additional training in order to access student information and to implement each student's IEP.	Individual Correction The district must reconvene the IEP teams of the 20 IEPs identified as noncompliant to review and amend annual goals to contain the following three critical elements: 1. Clearly defined behavior: the specific action the child will be expected to perform. 2. The condition (situation, setting or given material) under which the behavior is to be performed. 3. Performance criteria desired: the level the child must demonstrate for mastery and the number of times the child must demonstrate the skill or behavior. Systemic Correction The district must implement procedures to ensure that annual goals include the following three critical elements to demonstrate correction: 1. Clearly defined behavior: the specific action the child will be expected to perform. 2. The condition (situation, setting or given material) under which the behavior is to be performed. 3. Performance criteria desired: the level the child must demonstrate for mastery and the number of times the child must demonstrate the skill or behavior. OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.	Yes A Corrective Action Plan is required due to meeting the 30% threshold of non-compliance.

Record	Regulation 34		Evidence of Correction	Must be
Review Item	CFR or OAC	Evidence of Findings	Required Actions	addressed in CAP
DS-7	300.320(a)(4)	Record Review	Individual Correction	
		Eight school age and three preschool student IEPs did not contain a statement of specially designed instruction that addresses the needs of the child and supports annual goals. Interviews	The district must reconvene the IEP teams of the 11 IEPs identified as noncompliant to review and amend the specially designed instruction to describe the adaption of, as appropriate to the needs of the child, the content, methodology, or delivery of instruction. Systemic Correction	A Corrective Action Plan is required due to meeting the 30% threshold of non-compliance.
		A variety of methods and styles are utilized to provide specially designed instruction and support is needed to properly document what is provided.	The district must submit evidence to OEC of written procedures and practices in place regarding the IEP process of determining specially designed instruction.	
			OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.	
DS-8	300.320(a)(7)	Record Review	Individual Correction	⊠ No
		Three school age student IEPs did not indicate the location where the specially designed instruction will be provided. All preschool student IEPs indicated the location where the specially designed instruction will be	The district must reconvene the IEP teams of the three IEPs identified as noncompliant to review and amend the location where the specially designed instruction will be provided. Systemic Correction	The district does not need to address this finding in a Corrective Action Plan.
		provided.	OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.	
DS-9	300.320(a)(7)	Record Review	Individual Correction	⊠ No
		Two school age student IEPs did not indicate the amount of time and frequency of the specially designed instruction. All preschool student IEPs indicated the amount of time and frequency of the specially designed	The district must reconvene the IEP teams of the two IEPs identified as noncompliant to review and amend the amount of time and frequency of the specially designed instruction.	The district does not need to address this finding in a Corrective Action Plan.
		instruction.	Systemic Correction	
			OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.	

Record Review	Regulation 34	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
Item	CFR or OAC	Evidence of Findings	Required Actions	addressed iii CAP
DS-10	300.320(a)(4)	Record Review	Individual Correction	⊠ Yes
		Two school age and four preschool student IEPs did not identify related services that address the needs of the child and support the annual goals.	The district must reconvene the IEP teams of the six IEPs identified as noncompliant to review and amend the IEP to include related services that were identified as needed in the IEP.	A Corrective Action Plan is required due to meeting the 30% threshold of non-compliance.
			Systemic Correction	
			The district must submit evidence to OEC of written procedures and practices in place regarding the IEP process of addressing identified related service needs.	
			OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.	
DS-11	300.320(a)(7)	Record Review	Individual Correction	⊠ No
		Four school age student IEPs did not indicate the location where the related services will be provided. All preschool student IEPs indicated the location where the related services will be provided.	The district must reconvene the IEP teams of the four IEPs identified as noncompliant to review and amend the IEP to include the location where the related services will be provided.	The district does not need to address this finding in a Corrective Action Plan.
			Systemic Correction	
			OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.	

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction Required Actions	Must be addressed in CAP
DS-12	300.320(a)(7)	Record Review One school age student IEPs did not indicate the amount of time and frequency of the related services to be provided. All preschool student IEPs indicated the amount of time and frequency of the related services to be provided.	on the IEP the amount of time and frequency of the	No The district does not need to address this finding in a Corrective Action Plan.

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

Each school district shall ensure that to the maximum extent appropriate, children with disabilities, including children in public or nonpublic institutions or other care facilities, are educated with children who are nondisabled; and that a continuum of alternative placements is available to meet the needs of children with

disabilities for special education and related services.

Record	Regulation 34	LIOTI AND TEIGLED SETVICES.	Evidence of Correction	Must be
Review Item	CFR or OAC	Evidence of Findings	Required Actions	addressed in CAP
LRE-1	300.324(a)(2)(v)	Record Review	Individual Correction	
		Two school age and one preschool student IEPs did not identify assistive technology to enable the child to be involved in and make progress in the general education curriculum. Other Considerations	The district must reconvene the IEP teams of the three 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.	A Corrective Action Plan is required due to meeting the 30% threshold of non-compliance.
		Three records indicated the application of assistive technology for students, but this use was not	Systemic Correction	
		described or referenced in the assistive technology section of the IEP.	The district must submit evidence to OEC of written procedures and practices in place regarding assistive technology.	
			OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.	
LRE-2	300.320(a)(6)(i)	Record Review	Individual Correction	
		Thirteen (13) school age and one preschool student IEPs did not identify accommodations provided to enable the child to be involved in and make progress in the general education curriculum. Interviews	The district must reconvene the IEP teams of the 14 IEPs identified as noncompliant to review the accommodations that would directly assist the child to access the course content without altering the amount or complexity of the information taught and include them on the IEP.	A Corrective Action Plan is required due to meeting the 30% threshold of non-compliance.
		Staff members need support to more accurately identify accommodations for students.	Systemic Correction	
			The district must submit evidence to OEC of written procedures and practices in place regarding accommodations.	
			OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.	

Record	Regulation 34		Evidence of Correction	Must be
Review Item	CFR or OAC	Evidence of Findings	Required Actions	addressed in CAP
LRE-3	300.320(a)(4)	Record Review	Individual Correction	⊠ Yes
		Seven school age student IEPs did not identify modifications to enable the child to be involved in and make progress in the general education curriculum. All preschool student IEPs identified modifications to enable the child to be involved in and make progress in the general education curriculum.	The district must reconvene the IEP teams of the seven IEPs identified as noncompliant to review the modifications that would alter the amount or complexity of materials or the performance expected of the child from grade level curriculum expectations and include them on the IEP.	A Corrective Action Plan is required due to meeting the 30% threshold of non-compliance.
		<u>Interviews</u>	Systemic Correction	
		Staff members need support to more accurately identify modifications for students.	The district must submit evidence to OEC of written procedures and practices in place regarding modifications.	
			OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.	
LRE-4	300.320(a)(4)	Record Review	Individual Correction	⊠ No
		One school age student IEP did not identify supports for school personnel to enable the child to be involved in and make progress in the general education curriculum. All preschool student IEPs identified supports for school personnel to enable the child to be involved in and make progress in the general education curriculum.	The district must reconvene the IEP team of the one IEP identified as noncompliant to review the supports for school personnel that were identified by the IEP team and define on the IEP the support, who will provide it and when the support will take place. Systemic Correction	The district does not need to address this finding in a Corrective Action Plan.
			OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.	

Record Regulation 34		Evidence of Correction	Must be
Review CFR or OAC	Evidence of Findings	Required Actions	addressed in CAP
LRE-5 300.320(a)(5)	Record Review	Individual Correction	
	Five school age and four preschool student IEPs did not include an explanation of the extent to which the child will not participate with nondisabled children in the regular education classroom.	The district must reconvene the IEP teams of the nine IEPs identified as noncompliant to review and include a justification for why the child was removed from the regular education classroom.	A Corrective Action Plan is required due to meeting the 30% threshold of non-compliance.
		The justification should:	non compliance.
		 Be based on the needs of the child, not the disability. Reflect that the team has given adequate consideration to meeting the student's needs in the regular classroom with supplementary aids and services. Document that the nature or severity of the disability is such that education in regular education classes, even with the use of supplementary aids and services, cannot be achieved satisfactorily. Describe potential harmful effects to the child or others, if applicable. Systemic Correction The district must submit evidence to OEC of written procedures and practices in place regarding the least restrictive environment placement decision process. OEC will contact the district for submission of new records and review these records to determine compliance with this regulation. 	

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction Required Actions	Must be addressed in CAP
Item LRE-6	300.321(5)	Record Review Eight school age and three preschool student IEPs did not indicate that the IEP Team included a group of qualified professionals. Interviews The need for obtaining parent signatures was emphasized during all of the interviews.	Individual Correction	Yes A Corrective Action Plan is required due to meeting the 30% threshold of non-compliance.
			Systemic Correction The district must submit evidence to OEC of written procedures and practices in place regarding people qualified to interpret the instructional implications of evaluation results involvement in the IEP process. OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.	

Component 4: Discipline

Each school district shall ensure that, if the child's behavior impedes his or her learning or the learning of others, the IEP team must specifically consider the child's behavioral needs. There were no student records indicating removal for disciplinary reasons.

Fiscal Components, OEC's Review Findings, and District Required Actions

Component 1: Statement of Accounts

The district/school has submitted its FY12 FERs for IDEA Part B and Early Childhood IDEA. The district's financial detail (FINDET) report projects to match the current year budget in the CCIP by subtotaling FINDET transactions according to object codes (100, 200, 400, 500, 600 & 800) for the year to date. The year to date expenditures will be reviewed for coding accuracy. The fiscal reports are evidence that ensure that district children with disabilities have available to them a free appropriate public education (FAPE) that emphasizes special education and related services designed to meet their unique needs.

Findings		Evidence of Correction		Must be
Citation	Evidence	Required Actions	Date Due	addressed in CAP
300.202	Nelsonville-York City School District provided fiscal reports for the FY14 IDEA Part B and early childhood program year. The financial detail report (FINDET) was provided and aligned with the budget.			⊠ No

Component 2: Payroll Expenditures

The district/school is able to document that the 516 and 587 funds were expended in FY14 for an appropriate purpose; payroll expenditures are supported by Personal Activity Reports (PAR) showing the Time and Effort or Semi-Annual Certification; expense were properly coded to the correct function and object code; all staff in certified positions have appropriate licensure; all funded positions have position descriptions; district's ACCRPTs and budget are in agreement.

Findings		Evidence of Correction		Must be
Citation	Evidence	Required Actions	Date Due	addressed in CAP
300.202	The district provided an accounting report (ACCRPT) for six employees being paid out of 516 IDEA funds. The employees consisted of three aides, a secretary, the special education director, and a supervisor of alternative classroom. The staff personnel have multiple cost objectives. Time and effort was demonstrated for these staff. However, the district also used semi-annual certifications that do not apply. Semi-annual sign-offs should only be used for positions with a single cost objective. All staff members in certified positions have appropriate licensures. Job descriptions were provided for the staff members being paid with IDEA funds. The job description for the supervisor of the alternative classroom position did not reference special education. That position serves only	Individual Correction The district will update the job description of the supervisor of the alternative classroom and indicate that the position only serves students with disabilities. Systemic Correction None		No
	special education students. Expenses were properly coded to the correct function and object code.			

Component 3: Non-Payroll Expenditures

The district/school is able to document that the 516 and 587 funds that were expended in FY14 for an appropriate purpose and reasonable for the program; that fiscal coding is appropriate and the funds were charged to the proper fund, function and object; that the district is able to document the expenditure with a purchase order, receipt statement or invoice.

Findings Citation		Evidence of Correction		Must be
	Evidence	Required Actions	Date Due	addressed in CAP
300.202	Twelve (12) vouchers were provided by Nelsonville-York City School District and reviewed for FY14 fund 516. The district is only using 1231 (multi-handicapped) for all special education supply and equipment purchases. Nelsonville-York City School District participates in a consortium with the ESC.	Individual Correction The district will begin this year to code expenditures with more specific and accurate function codes for special education instruction. Systemic Correction		⊠ Yes
	There were not any non-payroll expenditures for fund 587.	The district will develop a plan to ensure the application and use of more precise and accurate function codes and object codes are utilized.		

Component 4: Use of funds for Capital Outlay and equipment purchase

If the district/school expended FY14 516 and 587 funds for Capital Outlay and/or equipment, the district/school evidences that it has followed the board adopted procurement policy. The district must ensure that equipment and supplies placed in the non-public school are used for IDEA purposes only and can be removed from the non-public school without remodeling the school facility.

Findings		Evidence of Correction		Must be
Citation	Evidence	Required Actions	Date Due	addressed in CAP
300.202	The district presented a copy of its procurement policy and followed its procurement policy in the purchase and disposal of the equipment.	Individual Correction None		⊠ No
		Systemic Correction None		

Component 5: Equipment inventory policy and procedures

The district/school retains control and administration of FY14 516 and 587 funds used to purchase materials, equipment and property (i.e.bus) purchased with those funds for the uses and purposes provided in the IDEA. The district is properly identifying equipment purchased with IDEA funds and is complying with Board Policy in cataloguing and inventorying the equipment. The district master list of equipment purchased with IDEA funds was updated within the last two years; the district has an equipment disposal policy; the district requested disposition instructions from ODE prior to disposing of assets with at fair market value of more than \$5,000.00, and sale proceeds were deposited back into the original grant.

Findings		Evidence of Correction		Must be
Citation	Evidence	Required Actions	Date Due	addressed in CAP
300.202	Nelsonville-York City provided an inventory list of 10 items purchased with Part B funds. The list included some items that were purchased prior to FY14. The items reviewed were located. However, the items did not have the correct room number on the list.	Individual Correction The district will provide a corrected inventory list to include the location of items purchased with Part B Funds. Systemic Correction None		⊠ No

Component 6: Non-Public Count and Proportionate Share

The district provides **child find** and ensures equitable participation. The district maintains in its records and provides to the SEA the following information related to parentally-placed private school children covered under 34 CFR 300.130 through 300.144: the number of children evaluated; the number of children determined to be children with disabilities; and the number of children served.

The district has timely and meaningful consultation with representatives of parentally-placed private school children with disabilities (consistent with 34 CFR 300.134); conducts a thorough and complete child find process to determine the number of parentally-placed private school children with disabilities attending private schools located in the school district.

Findings		Evidence of Correction		Must be addressed in CAP
Citation	Evidence	Required Actions	Date Due	
300.130 through 300.144	There are no non-public schools located within the district.	Individual Correction None		⊠ NA
		Systemic Correction None		

Component 7: Notification of Public Participation

In accordance with 34 CFR 300.165, the district/school provided a public hearing, adequate notice of the hearings and an opportunity for comment available to the general public including individuals with disabilities and parents of children with disabilities in planning the use of IDEA Part B funds.

Findings Citation		Evidence of Correction		Must be addressed in CAP No
	Evidence	Required Actions	Date Due	
300.165 and Part 300.201	The district held a public hearing providing opportunity for public input regarding the use of Part B funding.	Individual Correction None Systemic Correction None		

Component 8: Redirection of funds

If the district/school has redirected funds for CEIS, it is able to document the expenditures related to CEIS and to validate that the percent of the IDEA funds used for CEIS is 15% (or less if voluntary) of total allocation, to document the number of students who were served and are able to track and report on the number of students who subsequently received special education services. The district has developed a means through which to track the expenditure of Part B funds for CEIS in its financial system and is able to create a report showing the expenditure of funds for CEIS. The district has a plan in place to utilize the funds for CEIS.

If the district/school reduced its local expenditure, it was by no more than ½ of its additional allocation amount and the district can document the expenditures/reduction and the amount is shown in the CCIP.

Findings		Evidence of Correction		Must be
Citation	Evidence	Required Actions	Date Due	addressed in CAP
300.205	The district did not redirect any of their IDEA funds for Coordinated Early Intervening Services.	Individual Correction None Systemic Correction None		⊠ NA