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| <b>Ohio Connections Academy</b><br><b>IRN: 000236</b> |
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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 Ohio Connections Academy staff for their efforts, attention and time committed to the completion of the review processes.

The following report is a summary of the selective review conducted by OEC on October 10 and 11, 2018 as part of its general supervision requirements under the Individuals with Disabilities Education Act (IDEA) and Am. Sub. HB1.

### **Overview**

During the 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 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.

The 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

Ohio Connections Academy mailed 598 OEC approved letters on September 7, 2018 to all families with students with disabilities in the educational agency. OEC provided Ohio Connections Academy with a public meeting announcement to post on the district website.

On October 10, 2018, OEC consultants held three public meetings (Cleveland, OH, Worthington, OH and Mason, OH) for parents and other interested parties. Public parent meeting dates for all educational agencies selected for onsite reviews are posted on the ODE website. One parent and student and two OEC consultants attended the public meeting at Mason, OH. Attendees could speak to OEC representatives publicly in the meeting, speak to OEC representatives individually, provide written comments or both. Two attendees made comments during the public meeting (Mason, OH). No one attended the Cleveland and Worthington public meetings. Written comment forms were available before, during and after the meeting. OEC received two written comments and two phone calls.

During the public meeting, parents were advised by OEC consultants of the formal complaint process under IDEA and that their public comments did not constitute a formal complaint. The participants were also informed that while the information they provided may be helpful to the review, it may not necessarily

be acted upon as part of the review process. Ohio's procedural safeguards notice was available for participants who wanted a copy.

## 2. Pre-Onsite Data Analysis

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

## 3. Record Review/IEP Verification

Prior to the onsite visit, OEC consultants reviewed 25 school-age records of students with disabilities. These records included a variety of disability categories and ages. OEC conducted four IEP verifications during each student's LiveSession.

## 4. Staff/Administrative Interviews

On October 10, 2018, OEC consultants held two group sessions of interviews with nine administrators and eight teachers, school counselors, related services personnel and school psychologists. From October 29 to 31, 2018, OEC held seven individual phone interviews with related service providers 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 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 selective review, listed by subject area in the *Review of Findings and educational agency Required Actions Table*, must be corrected as indicated in the *Evidence/Required Actions* column.

OEC provides separate written correspondence to the educational agency and the parent/guardian 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 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.

An approved form for the CAP will be provided by OEC or can be accessed on ODE's website by using the keyword search "IDEA 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 by email to [Joseph.Kujkowski@education.ohio.gov](mailto:Joseph.Kujkowski@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 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 18, 2019**

## **OEC Trainings**

As part of the OEC monitoring process, personnel from Ohio Connections Academy 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 18, 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: **May 6, 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 2, 2019***

For questions regarding the review, please contact: Joe Kujkowski, OEC Contact Consultant at (614) 387-0377, toll-free at (877) 644-6338, or by e-mail at [Joseph.Kujkowski@education.ohio.gov](mailto:Joseph.Kujkowski@education.ohio.gov).

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

**Component 1: Child Find**

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

| Record Review Item | Regulation 34 CFR or OAC            | Evidence of Findings   | Evidence of Correction  | Must be addressed in CAP   |
|--------------------|-------------------------------------|--|---|--|
|                    |                                     |  | Required Actions  |  |
| CF-1               | 300.305(a) and 3301-51-11 (c)(1)(a) | <p><u>Record Review</u></p> <p>Ohio Connections Academy does not serve preschool students.</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>Nine 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>In the staff and administrative interviews, it was shared that interventions were available and utilized by teachers. In some cases, the interventions were not identified and other cases they were not documented clearly.</p> <p><u>Other Considerations</u></p> <p>For <b>initial evaluations</b>, the summary of interventions provided must include:</p> <ol style="list-style-type: none"> <li>1. A description of the research-based intervention(s) used,</li> <li>2. How long the intervention was provided (how many weeks),</li> </ol> | <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<br>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  |   |
|                    |  | <p>3. The intensity of the intervention – how often, and for how many minutes,</p> <p>4. A description of the results compared to the baseline data, and</p> <p>5. The decision was made as a result of the intervention(s).</p> <p>For <b>reevaluations</b>, the summary of interventions provided would include:</p> <p>1. A description as delineated above if interventions were provided in addition to the specially designed instruction, related services and other supports contained in the IEP.</p> <p><b>2. If no additional interventions were provided, a statement that it was determined by the ETR team that the IEP special education supports and services were appropriate to meet the child’s needs.</b></p> |   |   |
| CF-3               | 300.501(b)(1)<br>3301-51-06<br>(E)(2)(a) | <p><u>Record Review</u></p> <p>One student record 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><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   |  |
|                    |  |  | <u>Systemic Correction</u><br>The educational agency must submit evidence to OEC of written procedures and practices that include the parent in the evaluation planning process.   |  |
| CF-4               | 300.300  | <u>Record Review</u><br>Two student records did not provide evidence of parental consent obtained prior to new testing.  | <u>Individual Correction</u><br>None<br><br><u>Systemic Correction</u><br>The educational agency must submit evidence to OEC of written procedures and practices for obtaining parental consent obtained prior to new testing.   | <input checked="" type="checkbox"/> No<br>The educational agency does <u>not</u> need to address this finding in a Corrective Action Plan. |
| CF-5               | 300.304(c)(4)<br>3301-51-01<br>3301-51-06<br>(E)(2)(a) | <u>Record Review</u><br>Twenty-one (21) evaluations did not provide evidence that the evaluation addresses all areas related to the suspected disability.<br><br><u>Interviews</u><br>It was shared during the phone interviews (school psychologists) that “all” assessments took place “face-to-face” in one session. Therefore, it was documented that observations took place during testing. A separate observation must be conducted when it is indicated on the Planning Form.<br><br><u>Other Considerations</u><br>Include the school psychologist and related service providers in the planning meeting. | <u>Individual Correction</u><br>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.<br><br><u>Systemic Correction</u><br>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. | <input checked="" type="checkbox"/> Yes<br>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-6               | 300.306(c)               | <p><u>Record Review</u></p> <p>Nine evaluations did not show evidence of clearly stating the summary of assessment results.</p> <p><u>Other Considerations</u></p> <p>The ETRs did not contain a clear summary of the results of all the data and assessments conducted.</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>Six 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>Thirteen (13) evaluation team reports did not contain specific implications for instruction and progress monitoring.</p> <p><u>Other Considerations</u></p> <p>In some cases, there were no description or lack of clarity (the implications description was generic in nature and did not address the specific needs of the child) of the implications for instruction or for 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>               |

| 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)<br>3301-51-01<br>(B)(21) | <u>Record Review</u><br>One 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. | <u>Individual Correction</u><br>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.<br><br><u>Systemic Correction</u><br>The educational agency must submit evidence to OEC of written procedures and practices regarding the eligibility determination process. | <input checked="" type="checkbox"/> No<br>The educational agency does <u>not</u> need to address this finding in a Corrective Action Plan. |



**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<br>300.320 (b)<br>3301-51-07<br>(H)(2) | <p><u>Record Review</u></p> <p>Eight IEPs did not show evidence that the postsecondary transition plan met all eight required elements of the IDEA for the student, specifically in the following area(s):</p> <ol style="list-style-type: none"> <li>1. There are appropriate measurable postsecondary goal(s).</li> <li>2. The postsecondary goals are updated annually.</li> <li>3. The postsecondary goals were based on age appropriate transition assessment (AATA).</li> <li>4. There are transition services that will reasonably enable the student to meet the postsecondary goal(s).</li> <li>5. The transition services include courses of study that will reasonably enable the student to meet the postsecondary goal(s).</li> <li>6. The annual goal(s) are related to the student's transition service needs.</li> <li>7. There is evidence the student was invited to the IEP Team Meeting where transition services were discussed.</li> <li>8. When appropriate, there is evidence that a representative of any participating agency was invited to the IEP Team Meeting.</li> </ol> <p><u>Interviews</u></p> <p>It was shared in the interviews that age appropriate transition assessments (AATAs) were conducted for those "age appropriate" students, but the outcomes/data were not clearly captured/</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>documented in the student's IEPs. Also, the transition services were generic and not individualized to the student's needs.</p> <p><u>Other Considerations</u></p> <p>All eight components defined under IDEA must be found to be in compliance for the IEP Transition Plan to be considered compliant.</p> <p>Opportunity for further professional development in the selection of AATAs and individualizing transition services to each student's unique needs.</p> |   |   |
| DS-2               | 300.320(a)(1)            | <p><u>Record Review</u></p> <p>Twenty-one (21) 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>Baseline data that relates to the measurable annual goal must be included in the PLOP.</p>   | <p><u>Individual Correction</u></p> <p>The educational agency must reconvene the IEP teams of the IEPs identified as noncompliant to review and amend the PLOP related to each goal to include:</p> <ul style="list-style-type: none"> <li>• A summary of current daily academic/ behavior and/or functional performance (strengths and needs); and comparison to nondisabled peers.</li> <li>• Baseline data provided for developing a measurable goal.</li> </ul> <p><u>Systemic Correction</u></p> <p>The educational agency must submit evidence to OEC of written procedures and practices regarding the review of current academic/functional data when writing IEPs.</p> | <input checked="" type="checkbox"/> Yes<br><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>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>     | <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>Six IEPs did not contain annual goals that address the child's functional area(s) of need.</p> <p><u>Other Considerations</u></p> <p>If functional needs were addressed in the ETR as being an area of concern, they must be addressed in the IEP in some capacity. It can either be addressed as a goal, a related service or a statement that indicates the team has prioritized other needs or found that it is not an area of concern at this time.</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>Sixteen (16) IEPs did not contain measurable annual goals.</p> <p><u>Other Considerations</u></p> <p>In some instances, goals did not contain the required three elements (defined behavior, the condition, and performance criteria) when developing a compliant goal. Other records, combined more than one defined behavior which should be separated or prioritized based on student need and team discussion.</p> | <p><u>Individual Correction</u></p> <p>The educational agency must reconvene the teams of the IEPs identified as noncompliant to review and amend annual goals to contain the following critical elements:</p> <ol style="list-style-type: none"> <li>1. Clearly <u>defined behavior</u>: the specific action the child will be expected to perform.</li> <li>2. The <u>condition</u> (situation, setting or given material) under which the behavior is to be performed.</li> <li>3. <u>Performance criteria</u> desired: the level the child must demonstrate for mastery <b>and</b> the number of times the child must demonstrate the skill or behavior.</li> </ol> <p><u>Systemic Correction</u></p> <p>The educational agency must submit evidence to OEC of written procedures and practices regarding the development of measurable annual IEP goals.</p> | <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)<br>3301-51-07(L)<br>3301-51-07(H)(1)(d) | <p><u>Record Review</u></p> <p>Three IEPs did not show evidence that data were collected and analyzed to monitor performance on each goal and objective.</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"/> 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-7               | 300.320(a)(4)<br>3301-51-07<br>(H)(1)(e)(i) | <p><u>Record Review</u></p> <p>Seven 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>Other Considerations</u></p> <p>The nature of instruction must align with the student's individual needs and skills. In many instances, the specially designed instruction was very broad and did not specifically relate to the student.</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>                | <input checked="" type="checkbox"/> Yes<br><p>The educational agency needs to address this finding in a Corrective Action Plan.</p>               |
| DS-8               | 3301-51-07(L)(2)                            | <p><u>Record Review</u></p> <p>One IEP 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>  | <input checked="" type="checkbox"/> No<br><p>The educational agency does <u>not</u> need to address this finding in a Corrective Action Plan.</p> |
| DS-9               | 300.320(a)(7)<br>3301-51-07<br>(H)(1)(i)    | <p><u>Record Review</u></p> <p>Two IEPs did not indicate the location where the specially designed instruction will be provided.</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 location where the specially designed instruction will be provided.</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 the location where specially designed instruction will occur.</p> | <input checked="" type="checkbox"/> No<br><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-10              | 300.320(a)(7)<br>3301-51-07<br>(H)(1)(i) | <u>Record Review</u><br>One IEP did not indicate the amount of time and frequency of the specially designed instruction.              | <u>Individual Correction</u><br>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.<br><br><u>Systemic Correction</u><br>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<br>The educational agency does <u>not</u> need to address this finding in a Corrective Action Plan. |
| DS-11              | 300.320(a)(4)<br>3301-51-07<br>(H)(1)(e) | <u>Record Review</u><br>Five IEPs did not identify related services that address the needs of the child and support the annual goals. | <u>Individual Correction</u><br>The educational agency must reconvene the teams of the IEPs identified as noncompliant to review and amend the IEP to include related services that were identified as needed in the IEP.<br><br><u>Systemic Correction</u><br>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<br>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-12              | 300.320(a)(7)<br>3301-51-07<br>(H)(1)(i) | <p><u>Record Review</u></p> <p>Two IEPs did not indicate the location where the related services will be provided.</p> <p><u>Other Considerations</u></p> <p>The location of service must be explicitly stated in terms the parent will understand. Simply stating "Direct Speech/Occupational Therapy or services" does not specify the location where services are being delivered.</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 to include the location where the related services will be provided.</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 the location where related services will occur.</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-13              | 300.320(a)(7)<br>3301-51-07<br>(H)(1)(i) | <p><u>Record Review</u></p> <p>Two IEPs did not indicate the amount of time, duration and frequency of the related services to be provided.</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 on the IEP the amount of time and frequency of the related services to be provided.</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 the amount and frequency of related services to be provided.</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-14              | 3301-51-07                           | <p><u>IEP Verification</u></p> <p>OEC conducted four IEP Verifications in the virtual classroom setting.</p> <p>IEP verifications to observe IEP services delivered at Ohio Connections Academy were not conducted in a typical manner. Four IEP verifications were conducted on September 26, 2018 during the “pre-onsite meeting” at the Worthington office.</p> <p>The IEP verifications were conducted during; virtual speech therapy, virtual occupational therapy, one-on-one academic LiveSession with an Intervention Specialist and group academic LiveSession with the general education teacher.</p> | <p><u>Individual Correction</u></p> <p>NA</p> <p><u>Systemic Correction</u></p> <p>NA</p>  | <input checked="" type="checkbox"/> NA   |
| DS-15              | 3301-51-07(L)                        | <p><u>Record Review</u></p> <p>All IEPs showed evidence that revisions were made based on data indicating changes in student needs or abilities.</p>  | <p><u>Individual Correction</u></p> <p>NA</p> <p><u>Systemic Correction</u></p> <p>NA</p>  | <input checked="" type="checkbox"/> NA   |
| DS-16              | 300.324(a)(2)(v)<br>3301-51-01(B)(3) | <p><u>Record Review</u></p> <p>One IEP did not identify 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>The educational agency must reconvene the team of the IEP identified as noncompliant to review assistive technology and/or services that would directly assist the child with a disability to increase, maintain, or improve their functional capabilities and include them on the IEP.</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"/> No<br>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-17              | 300.320(a)(6)(i)<br>3301-51-07<br>(H)(1)(g) | <u>Record Review</u><br>Eight IEPs did not identify accommodations provided to enable the child to be involved and make progress in the general education curriculum.<br><br><u>Other Considerations</u><br>The condition(s) and/or extent were not clearly explained (who, when, where services provided).                                | <u>Individual Correction</u><br>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.<br><br><u>Systemic Correction</u><br>The educational agency must submit evidence to OEC of written procedures and practices regarding accommodations. | <input checked="" type="checkbox"/> Yes<br>The educational agency needs to address this finding in a Corrective Action Plan. |
| DS-18              | 300.320(a)(4)<br>3301-51-07<br>(H)(1)(e)    | <u>Record Review</u><br>All applicable IEPs reviewed identified modifications to enable the child to be involved and make progress in the general education curriculum.  | <u>Individual Correction</u><br>NA<br><br><u>Systemic Correction</u><br>NA  | <input checked="" type="checkbox"/> NA   |
| DS-19              | 3301-51-07<br>(H)(1)(h)(ii)                 | <u>Record Review</u><br>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.<br><br><b>Please Note: The AASCD criteria form is a required document on records written after July 1, 2018.</b> | <u>Individual Correction</u><br>NA<br><br><u>Systemic Correction</u><br>NA  | <input checked="" type="checkbox"/> NA   |
| DS-20              | 300.320(a)(4)<br>3301-51-07<br>(H)(1)(e)    | <u>Record Review</u><br>All IEPs reviewed identified supports for school personnel to enable the child to be involved and make progress in the general education curriculum.   | <u>Individual Correction</u><br>NA<br><br><u>Systemic Correction</u><br>NA  | <input checked="" type="checkbox"/> NA   |
| DS-21              | 300.321(5)<br>3301-51-07(l)                 | <u>Record Review</u><br>All IEPs indicated that the IEP Team included a group of qualified professionals.  | <u>Individual Correction</u><br>NA<br><br><u>Systemic Correction</u><br>NA  | <input checked="" type="checkbox"/> NA   |

### 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<br>300.320(a)(5)<br>3301-51-07<br>(H)(1)(f) | <p><u>Record Review</u></p> <p>One IEP 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 team of the IEP identified as noncompliant to review and include a justification as to why the child was removed from the general education classroom.</p> <p>The justification should:</p> <ul style="list-style-type: none"> <li>• Be based on the needs of the child, not the disability.</li> <li>• Reflect that the team has given adequate consideration to meeting the student's needs in the general classroom with supplementary aids and services.</li> <li>• Document that the nature or severity of the disability is such that education in general education classes, even with the use of supplementary aids and services, cannot be achieved satisfactorily.</li> <li>• Describe potential harmful effects to the child or others, if applicable.</li> </ul> <p><u>Systemic Correction</u></p> <p>The educational agency must submit evidence to OEC of written procedures and practices regarding the least restrictive environment placement decision process.</p> | <p><input checked="" type="checkbox"/> No</p> <p>The educational agency does <u>not</u> need to address this finding in a Corrective Action Plan.</p> |