

**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 Urbana City School District staff for their efforts, attention and time committed to the completion of the review process.

The following report is a summary of the onsite review conducted by OEC on November 7 and 8, 2018, as part of its general supervision requirements under the Individuals with Disabilities Education Act (IDEA) and Am. Sub. HB1.

Overview

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

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

Onsite reviews are targeted to include the following specific areas:

- Child Find;
- Delivery of Services;
- Least Restrictive Environment;
- IEP Verification of delivery of services;
- Parent Input; and
- Teacher and Administrator Interviews.

Data Sources

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

1. Public Parent Meeting and Written Comments

Urbana City School District mailed 470 OEC approved letters to all families with students with disabilities in the educational agency. OEC provided the educational agency with a public meeting announcement to post on the district website. Public parent meeting dates for all educational agencies selected for onsite reviews are also posted on the ODE website.

On November 7, 2018, OEC consultants held a public meeting for parents and other interested parties. One parent /family member and one State Support Team (SST) Region 6 representative attended the public meeting. Attendees could speak to OEC representatives publicly in the meeting, speak to OEC representatives individually, and provide written comments or both. One attendee made comments during the public meeting. Written comment forms were available before, during and after the meeting. OEC received no written comments.

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. 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 determining potential growth areas and educational agency strengths.

3. Record Review/IEP Verification

Prior to the onsite visit, OEC consultants reviewed 16 records of students with disabilities. OEC selected records of students with disabilities from a variety of disability categories and ages. Four student records were selected for IEP verification in the classroom setting.

4. Staff/Administrative Interviews

On November 6th, 2018, OEC consultants held nine sessions of interviews with nine administrators and 44 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.

Findings of Noncompliance

A finding is made when noncompliance is identified with evaluation team report (ETR) and/or individualized education program (IEP) requirements. Noncompliance that is systemic in nature or that is identified in **30% or more** of the records reviewed by OEC and/or substantiated through other data sources must be included in a comprehensive corrective action plan (CAP) with action steps to address each of the noncompliance findings. All noncompliance identified by OEC as part of the review (listed by subject area in the *OEC's Review Findings and Educational Agency Required Actions Table*) must be corrected as indicated in the *Evidence of Correction/Required Actions* column.

OEC provides separate written correspondence to the parent/guardian when action is required to correct findings of noncompliance for individual students. The educational agency will receive copies of this correspondence.

Corrective Action Plan (CAP)

The educational agency will develop a CAP to address any items identified in this summary report. An approved form for the CAP will be provided by OEC or can be accessed on ODE's website by using the keyword search "Monitoring". The CAP developed by the educational agency must include the following:

- Activities to address all areas identified in this summary report;
- Documentation/evidence of implementation of the activities;
- Individuals responsible for implementing the activities;
- Resources needed;
- Completion dates; and
- Continued Plan for Improvement and/or Compliance.

The educational agency must submit the CAP by email to raymond.mccain@education.ohio.gov within 30 school days from the date of this report. OEC will review the action plan submitted by the educational agency for approval. If OEC deems that a revision(s) is necessary, the educational agency will be required to revise and resubmit. The educational agency will be contacted by OEC and notified when the action plan has been approved.

CAP Due Date: March 11th, 2019

OEC Trainings

As part of the OEC monitoring process, Urbana 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 State Support Team (SST) for additional training.

*Completion of LMS Training Modules Due Date: **March 11th, 2019***

Individual Correction

The educational agency has **60 school days** from the date of this summary report to correct all identified findings of noncompliance for individual students, unless noted otherwise in the report. Detailed information on individual findings are provided in a separate report.

*Individual Correction Due Date: **April 30th, 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: **October 1st, 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 with the OEC and SST assistance.

For questions regarding the review, please contact: Raymond McCain, OEC Contact Consultant, at (614) 752-1398, toll-free at (877) 644-6338, or by e-mail at raymond.mccain@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>Preschool records were not reviewed.</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>Four 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>It was stated in several of the interviews that the new Response to Intervention (RtI) manual seems vague, unmanageable and hard to follow. Others stated the process lasts too long and students never seem to “get out” of the RtI tiers. Lack of Intervention Specialists’ involvement in any of the RtI processes seemed to be an issue as well. Staff also commented that the new updated RtI manual was just provided to them via email with no training scheduled or available.</p> <p><u>Other Considerations</u></p> <p>The district needs to strengthen their RtI process as well as provide some professional development and training to their staff.</p>	<p><u>Individual Correction</u></p> <p>OEC has verified that these students have a current ETR in place, so no additional individual correction is required.</p> <p><u>Systemic Correction</u></p> <p>The educational agency must submit evidence to OEC of written procedures and practices regarding documentation of intervention and supports provided prior to completion of the initial evaluation team report.</p>	<input checked="" type="checkbox"/> Yes The educational agency 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	
CF-3	300.501(b)(1) 3301-51-06 (E)(2)(a)	<p><u>Record Review</u></p> <p>Three student records did not show evidence that the parent was afforded the opportunity to participate in the evaluation team planning meeting.</p> <p><u>Interview</u></p> <p>During the interview sessions with the intervention specialists, it was stated that planning meetings were not scheduled with the parents. Instead planning forms were sent home to the parent for their signatures.</p>	<p><u>Individual Correction</u></p> <p>The educational agency must provide evidence that the parent was involved or provided the opportunity to participate in the evaluation planning process.</p> <p>The evidence may include evaluation planning form, prior written notice, parent invitation, referral form or communication log.</p> <p>If the educational agency cannot provide documentation that the parent was involved or provided the opportunity to participate in the evaluation planning process, the educational agency must conduct evaluation planning with the parent.</p> <p><u>Systemic Correction</u></p> <p>The educational agency must submit evidence to OEC of written procedures and practices that include the parent in the evaluation planning process.</p>	<input checked="" type="checkbox"/> No <p>The educational agency does <u>not</u> need to address this finding in a Corrective Action Plan.</p>
CF-4	300.300	<p><u>Record Review</u></p> <p>Six student records did not provide evidence of parental consent obtained prior to new testing.</p> <p><u>Other Considerations</u></p> <p>Some records did not document parent consent, or the ETR planning form for assessments was changed after the parent granted written, informed consent.</p>	<p><u>Individual Correction</u></p> <p>None</p> <p><u>Systemic Correction</u></p> <p>The educational agency must submit evidence to OEC of written procedures and practices for obtaining parental consent obtained prior to new testing.</p>	<input checked="" type="checkbox"/> Yes <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-5	300.304(c)(4) 3301-51-01 3301-51-06 (E)(2)(a)	<p><u>Record Review</u></p> <p>Fifteen (15) evaluations did not provide evidence that the evaluation addresses all areas related to the suspected disability.</p> <p><u>Interviews</u></p> <p>It was mentioned in the interview process that intervention specialists did not know or were not clear on the ETR process and would like to be more involved in the entire ETR process.</p> <p>They want to be able to provide direct feedback about student assessments. Instead they are only given a questionnaire to complete from the school psychologist.</p> <p><u>Other Considerations</u></p> <p>Urbana City Schools must develop an internal monitoring process which contains procedures to ensure:</p> <ul style="list-style-type: none"> • Active team participation in the ETR planning process and; • That appropriate evaluation data are available. <p>In several cases, assessments included on the planning form were not presented in Part 1 of the ETR, and, in other cases, assessments were reported in Part 1 that were not included on the planning form.</p>	<p><u>Individual Correction</u></p> <p>The educational agency will convene the ETR teams to conduct a reevaluation and provide evidence that the evaluation addresses all areas related to the suspected disability.</p> <p><u>Systemic Correction</u></p> <p>The educational agency must submit evidence to OEC of written procedures and practices to provide evidence that the evaluation addresses all areas related to the suspected disability.</p>	<input checked="" type="checkbox"/> Yes <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-6	300.306(c)	<p><u>Record Review</u></p> <p>Ten (10) evaluations did not show evidence of clearly stating the summary of assessment results.</p> <p><u>Other Considerations</u></p> <p>The information from Part 1 was not summarized in a clear and concise manner in Part 2. In some instances, the information was entirely omitted. Information in Part 1 must be brought forward to Part 2 in a manner that can be clearly understood by the parent and used by the IEP team to develop meaningful goals and services.</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>Eight ETRs did not contain a clear and succinct description of educational needs.</p> <p><u>Other Considerations</u></p> <p>The description of education needs in some ETRs was minimal and not appropriately individualized. These did not provide sufficient information to IEP teams needed to develop effective IEPs. Some descriptions left out relevant information related to the reported assessments.</p>	<p><u>Individual Correction</u></p> <p>The educational agency will reconvene the ETR teams to conduct a reevaluation and provide a clear and succinct description of the student's educational needs. The IEP team must consider the results of this reevaluation.</p> <p><u>Systemic Correction</u></p> <p>The educational agency must submit evidence to OEC of written procedures and practices regarding description of educational needs.</p>	<p><input checked="" type="checkbox"/> 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-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>Records reviewed were missing implications for progress monitoring. This would provide the parents with an understanding of where their child is regarding their academic growth. Often the implications portion was not specific to the individual student.</p>	<p><u>Individual Correction</u></p> <p>The educational agency will reconvene the ETR teams to conduct a reevaluation and provide a clear description of specific implications for instruction and progress monitoring. The IEP team must consider the results of this reevaluation.</p> <p><u>Systemic Correction</u></p> <p>The educational agency must submit evidence to OEC of written procedures and practices regarding implications for instruction and progress monitoring.</p>	<p><input checked="" type="checkbox"/> Yes</p> <p>The educational agency needs to address this finding in a Corrective Action Plan.</p>
CF-9	300.306(a)(1) 3301-51-01 (B)(21)	<p><u>Record Review</u></p> <p>Two evaluations did not show evidence that a group of qualified professionals, as appropriate to the suspected disability, were involved in determining whether the child is a child with a disability as well as the child's educational needs.</p>	<p><u>Individual Correction</u></p> <p>The educational agency must provide evidence that the ETR teams and other qualified professionals, as appropriate, participated in the determination of eligibility and educational needs. If not, the ETR team must reconvene and the agency must provide evidence of group participation to OEC.</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>Nine 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>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, graduation or exit from services date..</p> <p><u>Systemic Correction</u></p> <p>The educational agency must submit evidence to OEC of written procedures and practices regarding transition services.</p>	<p><input checked="" type="checkbox"/> Yes</p> <p>The educational agency needs to address this finding in a Corrective Action Plan.</p>

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
		<p><u>Interviews</u></p> <p>During the interview sessions, it was noted that transition-aged students typically were not invited to the ETR / IEP meetings when transition plans were being introduced or reviewed. Teachers also stated only students who were at least 17 received an invitation.</p> <p><u>Other Considerations</u></p> <p>Urbana City Schools must document services in the transition plan for each student; and continue to use AATAs to obtain data and information, especially preferences, interests, needs, and strengths (PINS). This will allow the IEP team to construct meaningful goals and services for students' transition plans.</p> <p>Students must be invited to attend their own IEP meeting when transition planning is being considered, starting at age 14 or younger if appropriate.</p> <p>Training must be provided to all members responsible for writing transition plans to ensure they are compliant and beneficial to the student.</p> <p>In addition, transition services were often generic in nature and not developed to address individual student needs as identified in the AATA. The phrase "provided an opportunity for" is not appropriate for transition services.</p>		

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
DS-2	300.320(a)(1)	<p><u>Record Review</u></p> <p>Sixteen (16) IEPs did not contain Present Levels of Academic Achievement and Functional Performance (PLOP) that addressed the needs of the student.</p> <p><u>Interviews</u></p> <p>Several staff members indicated they use common assessment data in order to create a current baseline for the Present Levels of Performance. However, these data are not specific to the deficits described in the goals.</p> <p>Responses to questions about present levels of performance indicated that the intervention specialists were not confident in developing goals from the present levels.</p> <p><u>Other Considerations</u></p> <p>The present levels in the IEPs reviewed were inconsistent in quality and content. Measurable baseline data were missing in many cases. Often, the present levels of performance did not relate to the annual goal. An internal monitoring and review system would be very helpful to promote compliance in present levels.</p>	<p><u>Individual Correction</u></p> <p>The educational agency must reconvene the IEP teams of the IEPs identified as noncompliant to review and amend the PLOP related to each goal to include:</p> <ul style="list-style-type: none"> • Summary of current daily academic/behavior and/ or functional performance (strengths and needs) compared to expected grade-level standards in order to provide a frame of reference; • Baseline data provided for developing a measurable goal. <p><u>Systemic Correction</u></p> <p>The educational agency must submit evidence to OEC of written procedures and practices regarding the review of current academic/functional data when writing IEPs.</p>	<input checked="" type="checkbox"/> Yes <p>The educational agency needs to address this finding in a Corrective Action Plan.</p>
DS-3	300.320(a)(2)(i)	<p><u>Record Review</u></p> <p>Two IEPs did not contain annual goals that address the child's academic area(s) of need.</p>	<p><u>Individual Correction</u></p> <p>The educational agency must reconvene the teams of the IEPs identified as noncompliant to review and amend the IEP. Annual goals must address the academic needs of the child unless the team provides evidence that the goals were prioritized based on the severity of the needs of the child.</p> <p><u>Systemic Correction</u></p> <p>The educational agency must submit evidence to OEC of written procedures and practices regarding the IEP process of addressing identified academic needs.</p>	<input checked="" type="checkbox"/> No <p>The educational agency does <u>not</u> need to address this finding in a Corrective Action Plan.</p>

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
DS-4	300.320(a)(2)(i)	<p><u>Record Review</u></p> <p>One IEP did not contain annual goals that address the child's functional area(s) of need.</p>	<p><u>Individual Correction</u></p> <p>The educational agency must reconvene the team of the IEP 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"/> No</p> <p>The educational agency does <u>not</u> need to address this finding in a Corrective Action Plan.</p>
DS-5	300.320(a)(2)(i)	<p><u>Record Review</u></p> <p>Fourteen (14) IEPs did not contain measurable annual goals.</p> <p><u>Other Considerations</u></p> <p>Measurable goals in the IEPs reviewed were inconsistent in quality and content. Often one or more required elements were missing. An internal monitoring and review system would be very helpful to promote compliance in annual IEP goals.</p>	<p><u>Individual Correction</u></p> <p>The educational agency must reconvene the teams of the IEPs identified as noncompliant to review and amend annual goals to contain the following critical elements:</p> <ol style="list-style-type: none"> 1. Clearly <u>defined behavior</u>: the specific action the child will be expected to perform. 2. The <u>condition</u> (situation, setting or given material) under which the behavior is to be performed. 3. <u>Performance criteria</u> desired: the level the child must demonstrate for mastery and the number of times the child must demonstrate the skill or behavior. <p><u>Systemic Correction</u></p> <p>The educational agency must submit evidence to OEC of written procedures and practices regarding the development of measurable annual IEP goals.</p>	<p><input checked="" type="checkbox"/> Yes</p> <p>The educational agency needs to address this finding in a Corrective Action Plan.</p>

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
DS-6	3301-51-07(B) and (C) 3301-51-07(L) 3301-51-07(H)(1)(d)	<p><u>Record Review</u></p> <p>Seven IEPs did not show evidence that data were collected and analyzed to monitor performance on each goal and objective.</p> <p><u>Interviews</u></p> <p>Teachers stated that progress monitoring is a work in progress. Since school started late due to construction, many progress reports have not been completed. They also acknowledged there is not a standardized policy in place for monitoring student progress. A formal progress monitoring policy may improve the communication between/ among teachers, students, parents and other stakeholders.</p> <p><u>Other Considerations</u></p> <p>Several of the progress reports reviewed contained multiple errors; student grade levels were not accurate; incorrect information, typos, wrong providers' names; as well as missing qualitative data to support the "AP" (Adequate Progress) reported.</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 written procedures and practices to provide evidence that 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)	<p><u>Record Review</u></p> <p>Four IEPs did not contain a statement of specially designed instruction that addresses the individual needs of the child and supports the annual goals.</p> <p><u>Interviews</u></p> <p>Intervention specialists stated that they do not have a good grasp on the concept of specially designed instruction (SDI).</p> <p><u>Other Considerations</u></p> <p>Training on writing compliant SDIs will be beneficial to the intervention specialist staff at Urbana City Schools. Some SDIs were either simply a list of accommodations or not specific to the student's 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 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 <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>Three IEPs did not contain measurable annual goals and services/placement consistent with progress made.</p>	<p><u>Individual Correction</u></p> <p>None</p> <p><u>Systemic Correction</u></p> <p>The educational agency must submit evidence to OEC of written procedures and practices regarding measurable annual goals and services consistent with progress made.</p>	<input checked="" type="checkbox"/> No <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) 3301-51-07 (H)(1)(i)	<p><u>Record Review</u></p> <p>All IEPs indicated the location where the specially designed instruction will be provided.</p>	<p><u>Individual Correction</u></p> <p>NA</p> <p><u>Systemic Correction</u></p> <p>NA</p>	<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-10	300.320(a)(7) 3301-51-07 (H)(1)(i)	<u>Record Review</u> All 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
DS-11	300.320(a)(4) 3301-51-07 (H)(1)(e)	<u>Record Review</u> Four IEPs did not identify related services that address the needs of the child and support the annual goals. <u>Interviews</u> There was a misunderstanding regarding some related service providers or therapists being included as part of the ETR meeting. Urbana School District would like these individuals to participate in ETR meetings. This concern should be addressed with the Educational Service Center (ESC).	<u>Individual Correction</u> 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. <u>Systemic Correction</u> The educational agency must submit evidence to OEC of written procedures and practices regarding the IEP process of addressing identified related service needs.	<input checked="" type="checkbox"/> Yes The educational agency needs to address this finding in a Corrective Action Plan.
DS-12	300.320(a)(7) 3301-51-07 (H)(1)(i)	<u>Record Review</u> All IEPs indicated the location where the 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> All IEPs indicated the amount of time, duration and frequency of the related services to be provided.	<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-14	3301-51-07	<p><u>IEP Verification</u></p> <p>Of the sixteen (16) IEPs reviewed, OEC conducted four IEP Verifications in the classroom setting.</p> <p>All four verifications showed evidence that the IEPs were being implemented as written.</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>One IEP did not show evidence that revisions were made based on data indicating changes in student needs or abilities.</p> <p><u>Other Considerations</u></p> <p>Through the review of records, it appears Urbana's special education staff is not familiar with the IEP amendment process. Urbana City Schools can address this issue by providing additional training through the SST.</p>	<p><u>Individual Correction</u></p> <p>The educational agency must reconvene the team to review and amend the IEP to reflect changes made based on current needs or abilities.</p> <p><u>Systemic Correction</u></p> <p>The educational agency must submit evidence to OEC of written procedures and practices regarding using data to revise IEPs based on changes in student needs or abilities.</p>	<input checked="" type="checkbox"/> Yes The educational agency needs to address this finding in a Corrective Action Plan.
DS-16	300.324(a)(2)(v) 3301-51-01(B)(3)	<p><u>Record Review</u></p> <p>All IEPs identified assistive technology to enable the child to be involved and make progress in the general education curriculum.</p>	<p><u>Individual Correction</u></p> <p>NA</p> <p><u>Systemic Correction</u></p> <p>NA</p>	<input checked="" type="checkbox"/> NA

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) 3301-51-07 (H)(1)(g)	<p><u>Record Review</u></p> <p>Four IEPs did not identify accommodations provided to enable the child to be involved and make progress in the general education curriculum.</p> <p><u>Interview</u></p> <p>Intervention Specialists stated they provided accommodations to the students in the co-teaching classroom but found it difficult to provide accommodations for students who were not in their co-teaching classroom.</p> <p><u>Other Considerations</u></p> <p>IEP accommodations listed were not explained regarding conditions and extent of the accommodation. Words like “as needed” and “may need” are not acceptable in describing accommodations. Accommodations cannot be the choice of the teacher or 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 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"/> Yes <p>The educational agency needs to address this finding in a Corrective Action Plan.</p>
DS-18	300.320(a)(4) 3301-51-07 (H)(1)(e)	<p><u>Record Review</u></p> <p>Two IEPs did not identify modifications to enable the child to be involved and make progress in the general education curriculum.</p> <p><u>Other Considerations</u></p> <p>The extent of modifications must be clearly explained.</p>	<p><u>Individual Correction</u></p> <p>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</p> <p><u>Systemic Correction</u></p> <p>The educational agency must submit evidence to OEC of written procedures and practices regarding modifications.</p>	<input checked="" type="checkbox"/> Yes <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-19	3301-51-07 (H)(1)(h)(ii)	<p><u>Record Review</u></p> <p>One student record provided evidence that the IEP team used the AASCD Participation Criteria form when deciding if the alternate assessment is appropriate for the student.</p> <p>OEC did not review this area in records that were completed prior to the requirement of the AASCD Participation Criteria form.</p> <p>Please Note: The AASCD criteria form is a required document in records written after July 1, 2018.</p> <p><u>Other Consideration</u></p> <p>During the interview sessions, it was mentioned alternate assessment participation was decided by the school psychologist from the high school. Alternate assessment decisions must be made during the IEP team meeting when the parents are in attendance. This decision must be a team decision and the AASCD Participation Criteria form must be completed and signed by all members present.</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-20	300.320(a)(4) 3301-51-07 (H)(1)(e)	<p><u>Record Review</u></p> <p>All IEPs identified supports for school personnel to enable the child to be involved and make progress in the general education curriculum.</p>	<p><u>Individual Correction</u></p> <p>NA</p> <p><u>Systemic Correction</u></p> <p>NA</p>	<input checked="" type="checkbox"/> NA

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
DS-21	300.321(5) 3301-51-07(l)	<u>Record Review</u> Four IEPs did not indicate that the IEP Team included a group of qualified professionals.	<u>Individual Correction</u> For the IEPs identified as noncompliant, the educational agency must: <ul style="list-style-type: none"> • Provide documentation that the parent was informed prior to the IEP meeting that the person qualified to interpret the instructional implications of evaluation results would not participate in the meeting, and • Provide a written excuse signed by the parents and the educational agency that allowed the person qualified to interpret the instructional implications of evaluation results not to 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>Five IEPs did not include an explanation of the extent to which the child will not participate with nondisabled children in the general education classroom.</p> <p><u>Interviews</u></p> <p>Staff commented they had limited knowledge on Least Restricted Environments and how to develop LREs for the different types of services offered.</p> <p>The size of some of inclusion classrooms appeared to be heavily populated with students with disabilities, percentages reaching 50% and one with 100%. These are not general education classrooms.</p> <p><u>Other Considerations</u></p> <p>Several LREs for related services indicated the student “May receive services in special areas or outside the general education setting.” LREs need to be specific, precise and clear about why the student is removed and when they are removed.</p>	<p><u>Individual Correction</u></p> <p>The educational agency must reconvene the teams of the IEPs identified as noncompliant to review and include a justification as to why the child was removed from the general education classroom.</p> <p>The justification should:</p> <ul style="list-style-type: none"> • Be based on the needs of the child, not the disability. • Reflect that the team has given adequate consideration to meeting the student’s needs in the general classroom with supplementary aids and services. • Document that the nature or severity of the disability is such that education in general education classes, even with the use of supplementary aids and services, cannot be achieved satisfactorily. • Describe potential harmful effects to the child or others, if applicable. <p><u>Systemic Correction</u></p> <p>The educational agency must submit evidence to OEC of written procedures and practices regarding the least restrictive environment placement decision process.</p>	<p><input checked="" type="checkbox"/> Yes</p> <p>The educational agency needs to address this finding in a Corrective Action Plan.</p>

Other Considerations

The Urbana City Schools Co-Teaching / Inclusion format for students with disabilities raises several areas of concern:

- Lack of a common planning time for both the general education teacher and intervention specialist to plan the co-teaching. This is an essential element needed for co-teaching to be beneficial to all involved.
- When there is common planning time scheduled, 30 minutes are dedicated for Teacher-Based Teams (TBTs). TBTs should not take priority over educators being able to co-plan their lessons. Some other arrangements need to be in place to allow for co-planning time.
- Some subjects were not offered as a co-teaching option, for example Algebra II. Staff felt this subject was especially needed to be co-taught.
- When an intervention specialist was absent for the day, a substitute was not provided. This made it difficult for the general education teacher to properly carry out all the responsibilities of the co-teaching model, including providing accommodations, modifications and particularly specially designed instruction. This could become a FAPE violation if services are not being provided.
- The continuum of alternative placements must be provided, and at Urbana it is insufficient. Newly-identified students could not be placed in a resource room setting, due to the large number of students already in resource rooms, and some settings labelled “inclusion” did not fit this description. There is an opportunity for Urbana to restructure its scheduling and personnel assignments to more appropriately fit the needs of individual students. Urbana may benefit from clarifying the expectations for intervention specialists, aides, and classroom teachers. Ideally, duties would differ depending on the needs of individual students. Conversations with staff revealed some inconsistency about responsibilities for instruction, progress monitoring, and discipline in classroom situations.

These issues need to be addressed along with professional development in the areas of implementing a successful co-teaching environment. Professional development is also needed in instructional strategies, universal design for learning and differentiated instruction for students with a disability. These need to be attended by all members of the Urbana district staff who are currently co-teaching.