

Westerville City School District IRN: 045047

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 Westerville City School District staff for their efforts, attention and time committed to the completion of the onsite portion of the review process.

The following report is a summary of the onsite review conducted by OEC and the Office of Early Learning and School Readiness (OEL&SR) on November 1 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 and OEL&SR consultants monitor the educational agency's implementation of IDEA to ensure compliance and positive results for students with disabilities. The primary focus of such reviews is to:

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

Onsite selective reviews include the following specific areas:

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

Data Sources

During the review, OEC and OEL&SR considered information from the following sources:

1. Public Parent Meeting and Written Comments

Westerville City School District mailed 2,167 OEC and OEL&SR approved letters to all families with students with disabilities in the educational agency. OEC and OEL&SR provided the educational agency with a public meeting announcement to post on the district website.

On November 1, 2018 and November 8, 2018, OEC and OEL&SR consultants held a public meeting for parents and other interested parties. Public parent meeting dates for all educational agencies selected for onsite reviews are posted on the ODE website. Attendees could speak to OEC and OEL&SR representatives publicly in the meeting or individually or provide written comments. On November 1, 2018, 30 parents and family members and one State Support Team (SST) Region 11 representative attended the public meeting, where four attendees made comments. On November 8, 2018, 24 parents and family members and one SST Region 11 representative attended the public meeting, where ten attendees made comments. Written comment forms were available before, during and after the meeting. OEC received a total of three written comments, three phone calls, and 15 email comments. OEL&SR received a total of 0 written comments, 0 phone calls, and two email comments.

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

2. Pre-Onsite Data Analysis

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

3. Record Review/IEP Verification

Prior to the onsite visit, OEC consultants reviewed 31 records of school-age students with disabilities. OEL&SR consultant reviewed eight (8) records as part of the Early Childhood Special Education Review. OEC and OEL&SR selected records of students with disabilities from a variety of disability categories and grades. Thirteen (13) school-age and three preschool student records were selected for IEP verification in the classroom setting.

4. Staff/Administrative Interviews

On November 1 and 8, 2018, OEC and OEL&SR consultants conducted a total of 24 sessions of interviews with 20 administrators and 115 teachers, paraprofessionals, school counselors, related services personnel and school psychologists. OEC and OEL&SR 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 or OEL&SR and/or substantiated through other data sources must be included in a Corrective Action Plan (CAP) with action steps to address each of the noncompliance findings. All noncompliance identified by OEC and OEL&SR is listed by subject area in the *Review of Findings and Educational Agency Required Actions* table and must be corrected by the educational agency as indicated in the *Evidence/Required Actions* column.

OEC and OEL&SR 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 and OEL&SR, or can be accessed on ODE's website by using the keyword search "OEC Selective Reviews". The corrective action plan 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 corrective action plan to Shauna Schramke, OEC Contact Consultant, at shauna.schramke@education.ohio.gov within 30 school days from the date of this report. OEC and OEL&SR will review the CAP submitted by the educational agency for approval. If OEC and OEL&SR deem revisions are necessary, the educational agency will be required to revise and resubmit. The educational agency will be contacted by OEC and notified when the action plan has been approved.

CAP Due Date: February 26, 2019

OEC Trainings

As part of the OEC monitoring process, Westerville 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 12, 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 15, 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: June 3, 2019

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

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

For questions regarding preschool records, please contact: Margie Spino, Early Childhood Consultant, by e-mail at margie.spino@education.ohio.gov.

Special Education School-age/Preschool Components, Review Findings, and Educational Agency Required Actions

Component 1: Child Find

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

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
CF-1	300.305(a) and 3301-51-11 (c)(1)(a)	<p><u>Record Review</u></p> <p>All preschool evaluation records of a child 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.</p>	<p><u>Individual Correction</u></p> <p>NA</p> <p><u>Systemic Correction</u></p> <p>NA</p>	<input checked="" type="checkbox"/> NA
CF-2	3301-51-06	<p><u>Record Review</u></p> <p>Seven (7) school-age 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>Interviews (informal and formal) and parent comments revealed that the intervention process is building-specific. It would benefit the district to explore which buildings are most successful in handling the intervention process and consider adopting those best-practices on a district-wide level.</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>	<p>School Age only:</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	
		<u>Other Considerations</u> Frequently, the district's initial ETRs did not contain a summary of interventions implemented to include description, intensity, time and results. The district must provide a summary of actual interventions and not simply a list of possible accommodations. For reevaluations, if no additional interventions were provided, simply noting that the team agreed the current IEP supports and services are suitable to meet the student's needs will suffice.		
CF-3	300.501(b)(1) 3301-51-06 (E)(2)(a)	<u>Record Review</u> All school-age and preschool student records showed evidence that the parent was afforded the opportunity to participate in the evaluation team planning meeting.	<u>Individual Correction</u> NA <u>Systemic Correction</u> NA	<input checked="" type="checkbox"/> NA
CF-4	300.300	<u>Record Review</u> All school-age records and all preschool records provided evidence of parental consent obtained prior to new testing.	<u>Individual Correction</u> NA <u>Systemic Correction</u> NA	<input checked="" type="checkbox"/> NA
CF-5	300.304(c)(4) 3301-51-01 3301-51-06 (E)(2)(a)	<u>Record Review</u> Sixteen (16) school-age and eight (8) preschool evaluations did not provide evidence that the evaluation addresses all areas related to the suspected disability. <u>Other Considerations</u> In many instances, evaluations were conducted and included in Part 1, but not listed on the planning form, or vice versa. It appears that required forms in Part 1 of the ETR were either not being used or were being altered by using multiple choice questions or checklists provided to evaluators without the option to summarize or provide more detail. Modifying required forms to omit essential components on the forms is not permitted.	<u>Individual Correction</u> The educational agency will convene the ETR teams to conduct a reevaluation and provide evidence that the evaluation addresses all areas related to the suspected disability. <u>Systemic Correction</u> The educational agency must submit evidence to OEC of written procedures and practices to provide evidence that the evaluation addresses all areas related to the suspected disability.	School Age & Preschool: <input checked="" type="checkbox"/> Yes The educational agency needs to address this finding in a Corrective Action Plan.

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
CF-6	300.306(c)	<p><u>Record Review</u></p> <p>Eleven (11) school-age and two (2) preschool evaluations did not show evidence of clearly stating the summary of assessment results.</p> <p><u>Other Considerations</u></p> <p>It is important that the summary of assessments in Part 2 of the ETR be clear to parents and address data from all evaluators in Part 1. In many cases, only the school psychologist's evaluation was represented and, in other cases, related service providers or other evaluators were omitted from the summary.</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>School Age only:</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 (6) school-age evaluation team reports did not contain a clear and succinct description of educational needs.</p> <p>All preschool evaluation team reports contained 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>Twenty-one (21) school-age and eight (8) preschool evaluation team reports did not contain specific implications for instruction and progress monitoring.</p> <p><u>Other Considerations</u></p> <p>In some instances, only the school psychologist's idea of implications for instruction was represented without a clear summary representing other evaluators from the team. Progress monitoring techniques were not suggested or mentioned in many of the records.</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>School Age & Preschool:</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) 3301-51-01 (B)(21)	<p><u>Record Review</u></p> <p>Three (3) school-age 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>All preschool evaluations showed 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 provide OEC evidence of group participation.</p> <p><u>Systemic Correction</u></p> <p>The educational agency must submit evidence to OEC of written procedures and practices regarding the eligibility determination process.</p>	<p><input checked="" type="checkbox"/> No</p> <p>The educational agency does <u>not</u> need to address this finding in a Corrective Action Plan.</p>

Component 2: Delivery of Services

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

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
DS-1	SPP Indicator 13 300.320 (b) 3301-51-07 (H)(2)	<p><u>Record Review</u></p> <p>Seven (7) school-age IEPs did not show evidence that the postsecondary transition plan met all eight required elements of the IDEA for the student, specifically in the following area(s):</p> <ol style="list-style-type: none"> 1. There are appropriate measurable postsecondary goal(s). 2. The postsecondary goals are updated annually. 3. The postsecondary goals were based on age appropriate transition assessment (AATA). 4. There are transition services that will reasonably enable the student to meet the postsecondary goal(s). 5. The transition services include courses of study that will reasonably enable the student to meet the postsecondary goal(s). 6. The annual goal(s) are related to the student's transition service needs. 7. There is evidence the student was invited to the IEP Team Meeting where transition services were discussed. 8. When appropriate, there is evidence that a representative of any participating agency was invited to the IEP Team Meeting. <p><u>Interviews</u></p> <p>During IEP Verifications and interviews, district staff on all levels seemed to be very knowledgeable and proactive regarding post-secondary transition programming. This, however, did not translate into student records. Reviewers noted that when this section of the record was compliant, they were only minimally so and did not truly represent available supports and services.</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>School Age only:</p> <p><input checked="" type="checkbox"/> Yes</p> <p>The educational agency needs to address this finding in a Corrective Action Plan.</p>

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
		<p><u>Other Considerations</u></p> <p>In most cases, post-secondary transition services and goals were generically represented in student records. Transition services were either not listed in the IEP, or lacked clarity and individualization. Reviewers noted instances where the student seemed to be responsible for his or her own transition services, which is not appropriate. Other records demonstrated missing information with regard to strengths and needs.</p>		
DS-2	300.320(a)(1)	<p><u>Record Review</u></p> <p>Fourteen (14) school-age IEPs and one (1) preschool IEP 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>Current, baseline data is necessary for writing actionable goals that are meaningful for student growth. Some records used STAR assessment scores as the sole determiner for current, baseline data. While these assessments can be a useful tool in concert with other instruments, a computer-adaptive assessment is not, by itself, an appropriate measure for identifying current skills and specific areas of weakness.</p>	<p><u>Individual Correction</u></p> <p>The educational agency must reconvene the IEP teams of the IEPs identified as noncompliant to review and amend the PLOP related to each goal to include:</p> <ul style="list-style-type: none"> • A summary of current daily academic/ behavior and/or functional performance (strengths and needs); and comparison to nondisabled peers. • Baseline data provided for developing a measurable goal. <p><u>Additional for Preschool</u></p> <ul style="list-style-type: none"> • IEP must describe how the disability affects the child's participation in appropriate activities to access, participate, and progress in the general curriculum and/or participation in developmentally appropriate activities. • PLOP has to relate to the child's developmental domains, functional performance and pre-academic skills. <p><u>Systemic Correction</u></p> <p>The educational agency must submit evidence to OEC of written procedures and practices regarding the review of current academic/functional data when writing IEPs.</p>	<p>School Age only:</p> <p><input checked="" type="checkbox"/> Yes</p> <p>The educational agency needs to address this finding in a Corrective Action Plan.</p>

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
DS-3	300.320(a)(2)(i)	<p><u>Record Review</u></p> <p>Seven (7) school-age IEPs did not contain annual goals that address the child's academic area(s) of need.</p>	<p><u>Individual Correction</u></p> <p>The educational agency must reconvene the teams of the IEPs identified as noncompliant to review and amend the IEP. Annual goals must address the academic needs of the child unless the team provides evidence that the goals were prioritized based on the severity of the needs of the child.</p> <p><u>Systemic Correction</u></p> <p>The educational agency must submit evidence to OEC of written procedures and practices regarding the IEP process of addressing identified academic needs.</p>	<p><input checked="" type="checkbox"/> No</p> <p>The educational agency does <u>not</u> need to address this finding in a Corrective Action Plan.</p>
DS-4	300.320(a)(2)(i)	<p><u>Record Review</u></p> <p>Five (5) school-age IEPs did not contain annual goals that address the child's functional area(s) of need.</p> <p>All preschool IEPs contained 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 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"/> 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-5	300.320(a)(2)(i)	<p><u>Record Review</u></p> <p>Nineteen (19) school-age and six (6) preschool IEPs did not contain measurable annual goals.</p> <p><u>Other Considerations</u></p> <p>In many instances, goals demanded multiple actions within a single goal. This does not allow for accurate measurement of a clearly defined behavior, which is necessary for clarity in defining criteria and mastery for a particular goal.</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>School Age & Preschool:</p> <p><input checked="" type="checkbox"/> Yes</p> <p>The educational agency needs to address this finding in a Corrective Action Plan.</p>
DS-6	3301-51-07(B) and (C) 3301-51-07(L) 3301-51-07(H)(1)(d)	<p><u>Record Review</u></p> <p>Two (2) school-age and eight (8) preschool IEPs did not show evidence that data were collected and analyzed to monitor performance on each goal and objective.</p> <p><u>Other Considerations</u></p> <p>Regarding all preschool records sampled, no evidence was presented to suggest that data was being collected and analyzed for measuring student progress toward goals.</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>Preschool only:</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 (4) school-age IEPs and one (1) preschool IEP 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>Individual Correction</u></p> <p>The educational agency must reconvene the teams of the IEPs identified as noncompliant to review and amend the specially designed instruction, as appropriate, to address the needs of the child.</p> <p><u>Systemic Correction</u></p> <p>The educational agency must submit evidence to OEC of written procedures and practices regarding the IEP process of determining specially designed instruction.</p>	<p><input checked="" type="checkbox"/> No</p> <p>The educational agency does <u>not</u> need to address this finding in a Corrective Action Plan.</p>
DS-8	3301-51-07(L)(2)	<p><u>Record Review</u></p> <p>Four (4) school-age IEPs did not contain measurable annual goals and services/placement consistent with progress made.</p> <p>All preschool IEPs contained measurable annual goals and services/placement consistent with progress made.</p>	<p><u>Individual Correction</u></p> <p>None</p> <p><u>Systemic Correction</u></p> <p>The educational agency must submit evidence to OEC of written procedures and practices regarding measurable annual goals and services consistent with progress made.</p>	<p><input checked="" type="checkbox"/> No</p> <p>The educational agency does <u>not</u> need to address this finding in a Corrective Action Plan.</p>
DS-9	300.320(a)(7) 3301-51-07 (H)(1)(i)	<p><u>Record Review</u></p> <p>Four (4) school-age IEPs did not indicate the location where the specially designed instruction will be provided.</p> <p>All preschool IEPs indicated 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>	<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-10	300.320(a)(7) 3301-51-07 (H)(1)(i)	<p><u>Record Review</u></p> <p>Four (4) school-age IEPs and one (1) preschool IEP did not indicate the amount of time and frequency of the specially designed instruction.</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 amount of time and frequency of the specially designed instruction.</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 specially designed instruction 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>
DS-11	300.320(a)(4) 3301-51-07 (H)(1)(e)	<p><u>Record Review</u></p> <p>Two (2) school-age IEPs did not identify related services that address the needs of the child and support the annual goals.</p> <p>All preschool IEPs identified related services that address the needs of the child and support the annual 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 the IEP to include related services that were identified as needed 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 the IEP process of addressing identified related service needs.</p>	<p><input checked="" type="checkbox"/> No</p> <p>The educational agency does <u>not</u> need to address this finding in a Corrective Action Plan.</p>

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
DS-12	300.320(a)(7) 3301-51-07 (H)(1)(i)	<p><u>Record Review</u></p> <p>Three (3) school-age IEPs and one (1) preschool IEP did not indicate the location where the related services 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 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) 3301-51-07 (H)(1)(i)	<p><u>Record Review</u></p> <p>Nine (9) school-age and seven (7) preschool IEPs did not indicate the amount of time, duration and frequency of the related services to be provided.</p> <p><u>Other Considerations</u></p> <p>In most cases, APE and related service providers were grouping multiple goals under one explanation of specially designed instruction without specifying the individual time and frequency meant for each goal. Goals must be listed separately.</p> <p>Although describing the amount of time and frequency of specially designed instruction by quarterly or yearly terms is technically permitted, the district should consider that such a broad explanation is unclear to all parties involved and tends to satisfy administrative needs rather than those of the individual student. This seems to be restricted only to APE and related service providers. The district is urged to review this practice.</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>School Age & Preschool:</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-14	3301-51-07	<p><u>School Age IEP Verification</u></p> <p>Of the 31 school-age IEPs reviewed, OEC conducted 13 IEP Verifications in the classroom setting.</p> <p>School Age Notes: Evidence of all staff working together to benefit the student was a common trend in the classrooms OEC staff visited. Staff was knowledgeable about student needs and accommodations, as written in the IEP.</p> <p><u>Preschool IEP Verification</u></p> <p>Of the eight (8) preschool IEPs reviewed, OEL&SR conducted three (3) IEP Verifications in the classroom setting.</p> <p>Preschool Notes: Regarding one preschool student, not all accommodations were being provided, as listed on the IEP.</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 school-age IEPs showed evidence that revisions were made based on data indicating changes in student needs or abilities.</p> <p>One (1) preschool IEP did not show evidence that revisions were made based on data indicating changes in student needs or abilities.</p>	<p><u>Individual Correction</u></p> <p>The educational agency must reconvene the teams to review and amend the IEPs to reflect changes made based on current needs or abilities.</p> <p><u>Systemic Correction</u></p> <p>The educational agency must submit evidence to OEC of written procedures and practices regarding using data to revise IEPs based on changes in student needs or abilities.</p>	<input checked="" type="checkbox"/> No The educational agency does <u>not</u> need to address this finding in a Corrective Action Plan.

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
DS-16	300.324(a)(2)(v) 3301-51-01(B)(3)	<p><u>Record Review</u></p> <p>Two (2) school-age IEPs did not identify assistive technology to enable the student to be involved and make progress in the general education curriculum.</p>	<p><u>Individual Correction</u></p> <p>The educational agency must reconvene the teams of the IEPs identified as noncompliant to review assistive technology and/or services that would directly assist the child with a disability to increase, maintain, or improve their functional capabilities and include them on the IEP.</p> <p><u>Systemic Correction</u></p> <p>The educational agency must submit evidence to OEC of written procedures and practices regarding assistive technology.</p>	<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-17	300.320(a)(6)(i) 3301-51-07 (H)(1)(g)	<p><u>Record Review</u></p> <p>Nine (9) school-age and three (3) preschool IEPs did not identify accommodations provided to enable the child to be involved and make progress in the general education curriculum.</p> <p><u>Other Considerations</u></p> <p>Records demonstrate a pattern of qualifying language when listing accommodations in student IEPs (“if necessary,” “may be used,” “as needed”). When accommodations are conditional, the specifics and circumstances of those situations must be clearly qualified in the IEP.</p> <p>In other records, explanations for accommodations were presented in vague terms that did not specify the extent of the accommodations (“adult supports,” “behavior charts,” “fading prompts,” “behavior intervention,” “positive supports”). These items should be explained. Not doing so may prevent the student from receiving needed accommodations due to a lack of communication. The conditions for and the extent of student accommodations must always</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>	<p>School Age & Preschool:</p> <p><input checked="" type="checkbox"/> Yes</p> <p>The educational agency needs to address this finding in a Corrective Action</p>

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
		<p>be clear, specific and transferable to another district.</p> <p>Language such as “suggested” and “consider providing” should never be used with regard to accommodations. Student accommodations are not optional. Such language gives permission for individuals to make decisions about the student without documentation and without the team.</p> <p>Lastly, it is important to remember that accommodations cannot be written in such a way that students are responsible for their peers’ access to the general education curriculum (e.g., peer scribe).</p>		
DS-18	300.320(a)(4) 3301-51-07 (H)(1)(e)	<p><u>Record Review</u></p> <p>Six (6) school-age 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>It is necessary to provide a more detailed description of modifications regarding curriculum content and instructional levels.</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>	<p>School Age Only:</p> <p><input checked="" type="checkbox"/> Yes</p> <p>The educational agency needs to address this finding in a Corrective Action Plan.</p>
DS-19	3301-51-07 (H)(1)(h)(ii)	<p><u>Record Review</u></p> <p>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.</p> <p>Please Note: The AASCD criteria form is a required document on records written after July 1, 2018.</p>	<p><u>Individual Correction</u></p> <p>NA</p> <p><u>Systemic Correction</u></p> <p>NA</p>	<p><input checked="" type="checkbox"/> NA</p>

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
DS-20	300.320(a)(4) 3301-51-07 (H)(1)(e)	<u>Record Review</u> Three (3) school-age IEPs did not identify supports for school personnel to enable the child to be involved and make progress in the general education curriculum.	<u>Individual Correction</u> The educational agency must reconvene the teams of the IEPs identified as noncompliant to review the supports for school personnel that were identified by the IEP team and define the supports on the IEP including who will provide the support and when it will take place.” <u>Systemic Correction</u> The educational agency must submit evidence to OEC of written procedures and practices regarding supports for school personnel.	School Age Only: <input checked="" type="checkbox"/> Yes The educational agency needs to address this finding in a Corrective Action Plan.
DS-21	300.321(5) 3301-51-07(l)	<u>Record Review</u> Three (3) school-age IEPs did not indicate that the IEP Team included a group of qualified professionals. All preschool IEPs indicated 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>Nine (9) school-age and four (4) preschool 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>Other Considerations:</u></p> <p>School Age: It is necessary to provide a more detailed description of modifications regarding curriculum content and instructional levels.</p> <p>Preschool: Specify when the child is being pulled out for services. Also, Section 7 should align with Section 11 (specify in Section 7 and justify in Section 11).</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>School Age & Preschool:</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:

1. Across interviews with all groups, it was clear that one-to-one supports tend to be discouraged or are simply not an option. The district's lack of openness to such supports could create instances where students are being provided services based on staff availability rather than individualized needs, and could put students in situations where they may not be provided access to the general education curriculum in their least-restrictive environment. Such restriction to the district's continuum of services fails to provide the consistency necessary for students who require these specific supports. The district must consider how this restricts students who may otherwise be successful in their neighborhood school instead of being sent to a school outside of their community because it houses a specific program.
2. There is an opportunity for improvement for the district regarding parent communication and positive rapport. While some comments were quite positive, OEC noticed a few trends across the many parent comments and concerns. Parents seemed more satisfied with building-level communication, but expressed concern with some district-level communication. In some instances, parents expressed the feeling of being unheard during the process of attempting to procure special education services for their child, and some expressed frustration with not being able to acquire the attention of the district in providing initial evaluations. Some parents seem to be confused about the intervention process and dissatisfied with the feedback that the district provided when their child was not moved past the Student Support Team (SST) process. As discussed earlier in the report, the SST process is building-specific rather than a consistent, district-wide practice. This confusion could be a product of such inconsistency. While many parents had positive comments to share with the district, it must be noted that just as many parents have expressed a dissatisfaction with the district regarding delivery of services, consistent access to accommodations, lack of documentation and follow-through, as well as poor communication. Some parents mentioned a frustration with not being made privy to building changes for their child due to "programs" and reported feeling pressured by the district to move buildings for specific programs rather than making solid attempts to help keep their child in their neighborhood school. Examining the continuum of placements may benefit the district in helping these parents feel more connected and heard during such matters. Others shared a concern of not feeling represented by the parent-mentor, and lost while they navigated the special education process. The district is urged to research and identify root causes in order to remedy discontent regarding the above concerns and move toward mending these fractures.
3. In addition to the above considerations, it must also be noted that many parents expressed a gratefulness to the district for helping them understand the special education process and for advocating for their child in a way that changed their lives for the better. This is clear in the obvious dedication of the educators we interviewed and the programs we witnessed while visiting schools. The district is proactive with providing supports and education in matters that are meaningful to their community. Westerville City Schools includes a student assistance / mental health team whose members receive training and certification in Trauma-Informed Care and supporting at-risk students and families. The district has been an active advisor and participant in the Building Better Lives initiative, since 2012, partnering with their community to address child trauma and introducing these principles into their classrooms. The district supports a forward-thinking anti-harassment policy inclusive to all student groups. Westerville City Schools has also been responding positively to parents and families who have requested more support and education surrounding reading supports for students struggling with dyslexia by providing screeners to all students and training teachers in appropriate reading intervention strategies. Westerville's outreach in student / family supports should be commended. Such a strength will help the district with repairing rapport and communication with the families who do not feel represented.