

Parma City School District IRN 044636
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**Ohio Department of Education, Office for Exceptional Children
2012-2013 Onsite Review Summary Report**

Introduction

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

The following report is a summary of the onsite review conducted on October 30, 2012 thru November 2, 2012 by the Ohio Department of Education's Office for Exceptional Children (OEC) and Office of Early Learning and School Readiness (OEL&SR) as part of its general supervision requirements under the Individuals with Disabilities Education Act (IDEA) and Am. Sub. HB1. The onsite visit consisted of the following reviews:

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

IDEA Review

Overview

Educational consultants from the Office for Exceptional Children (OEC) conducted IDEA review activities on October 30 and 31, and November 1 and 2, 2012. During the IDEA Review, OEC consultants monitor the LEA's implementation of IDEA to ensure compliance. The primary focus of the IDEA Review is to:

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

OEC focused the review on the following areas:

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

Data Sources

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

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

On October 16, 2012, Parma City School District mailed 2,059 OEC approved letters to all families with students with disabilities in the district. OEC provided the district with a public meeting announcement for inclusion on its website or newsletter. The district posted the information regarding the meeting on the school website.

On October 30, 2012, OEC consultants held a public meeting for parents and other interested parties. Public parent meeting dates for all districts selected for IDEA Reviews are posted on the ODE website. Eighteen parents and family members and three State Support Team (SST) Region 3 representatives attended the public meeting. Attendees could speak to OEC representatives publicly in the meeting or individually, provide written comments, or both. Ten attendees made comments during the public meeting. Because of inclement weather during the week of October 29, 2012, from Hurricane Sandy, OEC consultants conducted another parent meeting on November 26, 2012. Parents were informed of

this meeting by the district posting the meeting information in the Sun Post/Sun News on November 22, 2012, district e-newsletter, on the front page of the district website and each building web page, calendar item on the web, school social channels-Face Book, Leader Alert sent by phone to each family in the district. Twenty-nine parents and two State Support Team Region 3 representatives attended this public meeting. Eleven attendees made comments during this public meeting. Written comment forms were available before, during and after both of the meetings. OEC received four written comments from both meetings.

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

2. Pre-Onsite Data Analysis

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

3. Record Review

On October 30 and 31, 2012, OEC consultants reviewed 41 records of school age students with disabilities. An OEL&SR consultant, on November 1, 2012, reviewed six records as part of the Early Childhood Special Education Review. OEC selected records of a variety of children with disabilities from fourteen buildings.

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

4. Staff/Administrative Interviews

On November 1, 2012, OEC consultants held three sessions of interviews with twenty-five teachers, related services personnel, school psychologists, math coach, science coach and behavior coach. On November 2, 2012 OEC held interviews with eight administrators. OEC interviews focused on the following review areas: Child Find; Delivery of Services; Least Restrictive Environment (LRE) and IEP alignment; and Discipline.

Findings

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

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

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

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

Corrective Action Plan (CAP)

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

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

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

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

CAP Due Date: 3/4/2013

Individual Correction

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

Individual Correction Due Date: 4/24/2013

Systemic Correction

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

Systemic Correction Due Date: 1/15/2014

For questions about specific components of this report please contact:

- **Special Education School Age:** Linda Dotterweich, OEC Lead Consultant, at (440) 858-3766, or by e-mail at linda.dotterweich@education.ohio.gov.
- **Special Education Early Childhood:** Connie Prairie, Educational Consultant, at (614) 995-9934, toll-free at (877) 644-6338, or by e-mail at connie.prairie@education.ohio.gov.
- **Fiscal:** Paul Sogan, Educational Consultant, at (614)-728-2098 toll-free at (877) 644-6338, or by e-mail at paul.sogan@education.ohio.gov.
- **Gifted Education:** Rosemary Pearson, Educational Consultant, at (614) 644-2641, toll-free at (877) 644-6338, or by e-mail at rosemary.pearson@education.ohio.gov.

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

Component 1: Child Find

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

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
CF-1	300.303(b)(2)	<p><u>Record Review</u></p> <p>Seven reevaluation records indicated that the child's reevaluation was not completed within the three year timeline.</p> <p><u>Interviews</u></p> <p>From interview comments it was stated by district personnel that the district does not have a consistent way of tracking evaluation timelines across the district.</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>OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.</p>	<p><input checked="" type="checkbox"/> No</p> <p>The district does <u>not</u> need to address this finding in a Corrective Action Plan.</p>
CF-2	300.305(a)	<p><u>Record Review</u></p> <p>All preschool evaluation records of children transitioning from Part C, did utilize 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>None</p> <p><u>Systemic Correction</u></p> <p>None</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	
CF-3	OAC 3301-51-06 (2) and OAC 3301-51-06(4)	<p><u>Record Review</u></p> <p>Four school age initial 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>During the interview process, district personnel stated that there is no consistency in the Rtl process across the district on how to collect intervention data for the initial evaluations.</p>	<p><u>Individual Correction</u></p> <p>OEC has verified that these students have a current IEP in place, so no additional individual correction is required.</p> <p><u>Systemic Correction</u></p> <p>The district must submit evidence to OEC of written procedures and practices in place regarding documentation of intervention and supports provided prior to completion of the initial evaluation team report.</p> <p>OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.</p>	<p><input checked="" type="checkbox"/> Yes</p> <p>A Corrective Action Plan is required due to meeting the 30% threshold of non-compliance.</p>
CF-4	300.501(b)(1)	<p><u>Record Review</u></p> <p>Two school age records did not show evidence that the evaluation planning team included the parent.</p> <p>All preschool records showed evidence that the evaluation planning team included the parent.</p>	<p><u>Individual Correction</u></p> <p>The district must provide evidence that the parent was involved or provided the opportunity to participate (three documented attempts) 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 district cannot provide documentation that the parent was involved or provided the opportunity to participate in the evaluation planning process, the district must conduct evaluation planning with the parent or the district will provide evidence of the parent's involvement or opportunity to participate.</p> <p><u>Systemic Correction</u></p> <p>OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.</p>	<p><input checked="" type="checkbox"/> No</p> <p>The district 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	
			Required Actions	Must be addressed in CAP
CF-5	300.305(a)(1)	<p><u>Record Review</u></p> <p>Ten school age student evaluations did not provide evidence that the evaluation planning team reviewed existing data on the child.</p> <p>All preschool student evaluations provided evidence that the evaluation planning team reviewed existing data on the child.</p> <p><u>Interviews</u></p> <p>During the interviews when ask what their role in the planning of the evaluation was, staff was unsure about this process.</p>	<p><u>Individual Correction</u></p> <p>The district must provide the evaluation planning form or evidence documenting existing data was reviewed during the evaluation planning process. If not, the IEP team must reconvene the ETR planning and ETR meeting.</p> <p><u>Systemic Correction</u></p> <p>OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.</p>	<p><input checked="" type="checkbox"/> No</p> <p>The district does <u>not</u> need to address this finding in a Corrective Action Plan.</p>
CF-6	300.305(a)(2)	<p><u>Record Review</u></p> <p>Ten school age student evaluations did not provide evidence that the evaluation planning team identified what additional data, if any, were needed.</p> <p>All preschool student evaluations provided evidence that the evaluation planning team identified what additional data, if any, were needed.</p>	<p><u>Individual Correction</u></p> <p>The district must provide the evaluation planning form or evidence documenting additional data, if any was reviewed during the evaluation planning process. If not, the IEP team must reconvene the ETR planning and ETR meeting.</p> <p><u>Systemic Correction</u></p> <p>OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.</p>	<p><input checked="" type="checkbox"/> No</p> <p>The district does <u>not</u> need to address this finding in a Corrective Action Plan.</p>
CF-7	300.304(c)(4); OAC 3301-51-01; and OAC 3301-51-06	<p><u>Record Review</u></p> <p>One school age student evaluation did not provide evidence that the evaluation addresses all areas related to the suspected disability.</p> <p>All preschool student evaluations provided evidence that the evaluation addresses all areas related to the suspected disability.</p>	<p><u>Individual Correction</u></p> <p>The district will convene the ETR team 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>OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.</p>	<p><input checked="" type="checkbox"/> No</p> <p>The district does <u>not</u> need to address this finding in a Corrective Action Plan.</p>

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
CF-8	300.306(a)(1)	<p><u>Record Review</u></p> <p>Two school age student records did not show evidence that the parent of the child was involved in determining whether the child is a child with a disability.</p> <p>All preschool student records showed evidence that the parent of the child was involved in determining whether the child is a child with a disability.</p>	<p><u>Individual Correction</u></p> <p>The district must provide evidence that the parent was involved in determining whether the child is a child with a disability or evidence that the parent was provided the opportunity to participate in the eligibility determination as evidenced by three attempts to contact the parent. If not, the IEP team must reconvene the ETR meeting and provide OEC evidence of parent involvement.</p> <p><u>Systemic Correction</u></p> <p>OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.</p>	<p><input checked="" type="checkbox"/> No</p> <p>The district does <u>not</u> need to address this finding in a Corrective Action Plan.</p>
CF-9	300.306(a)(1)	<p><u>Record Review</u></p> <p>All school age student initial 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.</p> <p>One preschool student initial evaluation did not show evidence that a group of qualified professionals as appropriate to the suspected disability were involved in determining whether the child is a child with a disability.</p>	<p><u>Individual Correction</u></p> <p>The district must provide evidence that a group of qualified professionals participated in the eligibility determination. If not, the IEP team must reconvene the ETR meeting and provide OEC evidence of group participation.</p> <p>A group of qualified professionals includes the following, but is not limited to:</p> <ul style="list-style-type: none"> • Parent • Additional group members: <ul style="list-style-type: none"> • The child's regular education teacher; or a regular classroom teacher qualified to teach a child of his or her age; or • For a preschool child an individual qualified by the SEA to teach a child of his or her age; and • At least one person qualified to conduct individual diagnostic examinations of children. <p><u>Systemic Correction</u></p> <p>OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.</p>	<p><input checked="" type="checkbox"/> No</p> <p>The district does <u>not</u> need to address this finding in a Corrective Action Plan.</p>

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
CF-10	300.306(a)(1); 300.305(a); and 3301-51-01 (B)(21)	<p><u>Record Review</u></p> <p>Five school age reevaluations did not show evidence that a group of qualified professionals as appropriate to the suspected disability were involved in determining whether the child is a child with a disability.</p>	<p><u>Individual Correction</u></p> <p>The district must provide evidence that the IEP team and other qualified professionals participated in the eligibility determination. If not, the IEP team must reconvene the ETR meeting and provide OEC evidence of group participation.</p> <p>IEP Team Members include, but are not limited to:</p> <ol style="list-style-type: none"> 1. Parent 2. Regular Education Teacher 3. Special Education Provider 4. District Representative 5. An individual who can interpret the instructional implications of evaluation results, 6. At the discretion of the parent or school district, other individuals who have knowledge or special expertise regarding the child, including related services personnel as appropriate; 7. Whenever appropriate, the child with a disability. <p><u>Systemic Correction</u></p> <p>OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.</p>	<p><input checked="" type="checkbox"/> No</p> <p>The district does <u>not</u> need to address this finding in a Corrective Action Plan.</p>

Component 2: Delivery of Services

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

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
DS-1	300.320(a)(1)(i)	<p><u>Record Review</u></p> <p>Three school age student IEPs did not address how the child's disability affects his/her involvement and progress in the general education curriculum.</p> <p>All preschool student IEPs addressed how the child's disability affects his/her involvement and progress in the general education curriculum.</p>	<p><u>Individual Correction</u></p> <p>The district must reconvene the IEP teams of the three IEPs identified as noncompliant to review and amend the IEP to include a statement of how the child's disability affects the child's participation in appropriate activities to access, participate and progress in the general education curriculum.</p> <p><u>Systemic Correction</u></p> <p>OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.</p>	<p><input checked="" type="checkbox"/> No</p> <p>The district does <u>not</u> need to address this finding in a Corrective Action Plan.</p>
DS-2	300.320(a)(1)	<p><u>Record Review</u></p> <p>Four school age student IEPs did not contain Present Levels of Academic Achievement and Functional Performance (PLOP) that addressed the needs of the student.</p> <p>All preschool student IEPs contained Present Levels of Academic Achievement and Functional Performance (PLOP) that addressed the needs of the student.</p>	<p><u>Individual Correction</u></p> <p>The district must reconvene the IEP teams of the four 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); • Baseline data provided for developing a measurable goal. • For preschool, the PLOP should relate to the child's developmental domains, functional performance and pre-academic skills. <p><u>Systemic Correction</u></p> <p>OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.</p>	<p><input checked="" type="checkbox"/> No</p> <p>The district 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-3	300.320 (a)(2)(i)(A)	<u>Record Review</u> One school age student IEP did not contain annual goals that address the child's academic area(s) of need. All preschool student IEPs contained annual goals that address the child's academic area(s) of need.	<u>Individual Correction</u> The district must reconvene the IEP team of the one IEP identified as noncompliant to review and amend the IEP to include annual goals that address the academic needs that were identified in the IEP or provide evidence that the IEP team, based on the severity of the needs of the child, decided to prioritize addressing the needs. <u>Systemic Correction</u> OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.	<input checked="" type="checkbox"/> No The district does <u>not</u> need to address this finding in a Corrective Action Plan.
DS-4	300.320(a)(2)(i)(A)	<u>Record Review</u> Six school age student IEPs did not contain annual goals that address the child's functional area(s) of need. All preschool student IEPs contained annual goals that address the child's functional area(s) of need.	<u>Individual Correction</u> The district must reconvene the IEP teams of the six IEPs identified as noncompliant to review and amend the IEP to include annual goals that address the functional needs that were identified in the IEP or provide evidence that the IEP team, based on the severity of the needs of the child, decided to prioritize addressing the needs <u>Systemic Correction</u> OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.	<input checked="" type="checkbox"/> No The district 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-5	300.320(a)(2)(i)	<p><u>Record Review</u></p> <p>Fifteen (15) school age and five preschool student IEPs did not contain measurable annual goals.</p>	<p><u>Individual Correction</u></p> <p>The district must reconvene the IEP teams of the 20 IEPs identified as noncompliant to review and amend annual goals to contain the following six critical elements:</p> <ol style="list-style-type: none"> 1. Who? 2. Will Do What? 3. To What Level or Degree? 4. Under What Conditions? 5. In What Length of Time? 6. How Will Progress Be Measured? <p><u>Systemic Correction</u></p> <p>The district must implement new procedures to ensure that annual goals written subsequent to this report will include the following six critical elements to demonstrate correction:</p> <ol style="list-style-type: none"> 1. Who? 2. Will Do What? 3. To What Level or Degree? 4. Under What Conditions? 5. In What Length of Time? 6. How Will Progress Be Measured? <p>OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.</p>	<p><input checked="" type="checkbox"/> Yes</p> <p>A Corrective Action Plan is required due to meeting the 30% threshold of non-compliance.</p>

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
DS-6	300.320(a)(4)	<p><u>Record Review</u></p> <p>Seven school age student IEPs did not contain a statement of specially designed instruction that addresses the needs of the child and supports annual goals.</p> <p>All preschool student IEPs contained a statement of specially designed instruction that addresses the needs of the child and supports annual goals.</p>	<p><u>Individual Correction</u></p> <p>The district must reconvene the IEP teams of the seven IEPs identified as noncompliant to review and amend the specially designed instruction to describe the adaption of, as appropriate to the needs of the child, the content, methodology, or delivery of instruction.</p> <p><u>Systemic Correction</u></p> <p>OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.</p>	<p><input checked="" type="checkbox"/> No</p> <p>The district does <u>not</u> need to address this finding in a Corrective Action Plan.</p>
DS-7	300.320(a)(7)	<p><u>Record Review</u></p> <p>Nine school age student IEPs did not indicate the location where the specially designed instruction will be provided.</p> <p>All preschool student IEPs indicated the location where the specially designed instruction will be provided</p> <p><u>Interviews</u></p> <p>During the interviews, district personnel stated that many IEPs were not revised by the IEP team after the district changed to an “inclusive” model or were told to change the location without an IEP meeting.</p> <p><u>Other Considerations</u></p> <p>Parents were concerned with the new district model not following the IEP location of service.</p>	<p><u>Individual Correction</u></p> <p>The district must reconvene the IEP teams of the nine 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 district must submit evidence to OEC of written procedures and practices in place regarding the IEP process of determining the location where specially designed instruction will occur.</p> <p>OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.</p>	<p><input checked="" type="checkbox"/> No</p> <p>The district 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-8	300.320(a)(7)	<p><u>Record Review</u></p> <p>Five school age student IEPs did not indicate the amount of time and frequency of the specially designed instruction.</p> <p>All preschool student IEPs did indicate the amount of time and frequency of the specially designed instruction.</p> <p><u>Interviews</u></p> <p>Staff and building administration stated that with the scheduling at the middle schools and high schools with the district’s “inclusive” model that some students’ needs are not being met.</p> <p><u>Other Considerations</u></p> <p>Parents felt that with the “inclusive” model that their student’s needs were not being met.</p>	<p><u>Individual Correction</u></p> <p>The district must reconvene the IEP teams of the five 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 district must submit evidence to OEC of written procedures and practices in place regarding the IEP process of determining the amount and frequency of specially designed instruction to be provided.</p> <p>OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.</p>	<p><input checked="" type="checkbox"/> No</p> <p>The district does <u>not</u> need to address this finding in a Corrective Action Plan.</p>
DS-9	300.320(a)(4)	<p><u>Record Review</u></p> <p>Fourteen (14) school age student IEPs did not identify related services that address the needs of the child and support the annual goals.</p> <p>All preschool student 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 district must reconvene the IEP teams of the 14 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 district must submit evidence to OEC of written procedures and practices in place regarding the IEP process of addressing identified related service needs.</p> <p>OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.</p>	<p><input checked="" type="checkbox"/> Yes</p> <p>A Corrective Action Plan is required due to meeting the 30% threshold of non-compliance.</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)	<p><u>Record Review</u></p> <p>Two school age student IEPs did not indicate the location where the related services will be provided.</p> <p>All preschool student IEPs indicated the location where the related services will be provided.</p>	<p><u>Individual Correction</u></p> <p>The district must reconvene the IEP teams of the two 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>OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.</p>	<p><input checked="" type="checkbox"/> No</p> <p>The district does <u>not</u> need to address this finding in a Corrective Action Plan.</p>
DS-11	300.320(a)(7)	<p><u>Record Review</u></p> <p>Two school age student IEPs did not indicate the amount of time and frequency of the related services to be provided.</p> <p>All preschool student IEPs indicated the amount of time and frequency of the related services to be provided.</p> <p><u>Other Considerations</u></p> <p>During the public meeting parents stated that their children were not receiving the related services that were stated on the IEP. It was also stated that the related service provider was not showing up to provide services.</p>	<p><u>Individual Correction</u></p> <p>The district must reconvene the IEP teams of the two 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 district must submit evidence to OEC of written procedures and practices in place regarding the IEP process of determining the amount and frequency of related services to be provided.</p> <p>OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.</p>	<p><input checked="" type="checkbox"/> No</p> <p>The district does <u>not</u> need to address this finding in a Corrective Action Plan.</p>

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

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

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
LRE-1	300.324(a)(2)(v)	<p><u>Record Review</u> All school age and preschool student IEPs identified assistive technology to enable the child to be involved in and make progress in the general education curriculum.</p> <p><u>Interviews</u> District personnel stated that they do not implement assistive technology unless the district has it available.</p>	<p><u>Individual Correction</u> None</p> <p><u>Systemic Correction</u> None</p>	<input checked="" type="checkbox"/> NA
LRE-2	300.320(a)(6)(i)	<p><u>Record Review</u> Two school age student IEPs did not identify accommodations provided to enable the child to be involved in and make progress in the general education curriculum.</p> <p>All preschool student IEPs identified accommodations provided to enable the child to be involved in and make progress in the general education curriculum.</p>	<p><u>Individual Correction</u> The district must reconvene the IEP teams of the two IEPs identified as noncompliant to review the accommodations that would directly assist the child to access the course content without altering the amount or complexity of the information taught and include them on the IEP.</p> <p><u>Systemic Correction</u> OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.</p>	<input checked="" type="checkbox"/> No The district does <u>not</u> need to address this finding in a Corrective Action Plan.
LRE-3	300.320(a)(4)	<p><u>Record Review</u> Eight school age IEPs did not identify modifications to enable the child to be involved in and make progress in the general education curriculum.</p> <p>All preschool student IEPs identified modifications to enable the child to be involved in and make progress in the general education curriculum.</p>	<p><u>Individual Correction</u> The district must reconvene the IEP teams of the eight IEPs identified as noncompliant to review the modifications that would alter the amount or complexity of materials or the performance expected of the child from grade level curriculum expectations and include them on the IEP.</p> <p><u>Systemic Correction</u> OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.</p>	<input checked="" type="checkbox"/> Yes A Corrective Action Plan is required due to meeting the 30% threshold of non-compliance.

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
LRE-4	300.320(a)(4)	<p><u>Record Review</u></p> <p>One school age student IEP did not identify supports for school personnel to enable the child to be involved in and make progress in the general education curriculum.</p> <p>All preschool student IEPs identified supports for school personnel to enable the child to be involved in and make progress in the general education curriculum.</p> <p><u>Other Considerations</u></p> <p>Written comment from a parent said that support for school personnel and students' medical needs were not being met.</p>	<p><u>Individual Correction</u></p> <p>The district must reconvene the IEP team of the one IEP identified as noncompliant to review the supports for school personnel that were identified by the IEP team and define on the IEP the support, who will provide it and when the support will take place.</p> <p><u>Systemic Correction</u></p> <p>The district must submit evidence to OEC of written procedures and practices in place regarding supports for school personnel. OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.</p>	<p><input checked="" type="checkbox"/> No</p> <p>The district does <u>not</u> need to address this finding in a Corrective Action Plan.</p>
LRE-5	300.320(a)(5)	<p><u>Record Review</u></p> <p>Four school age student IEPs did not include an explanation of the extent to which the child will not participate with nondisabled children in the regular education classroom.</p> <p>All preschool student IEPs included an explanation of the extent to which the child will not participate with nondisabled children in the regular education classroom.</p> <p><u>Interviews</u></p> <p>Building administration stated that IEPs are being amended to fit the building schedule, space and staff allocation, not student needs.</p> <p><u>Other Considerations</u></p> <p>Parents and district personnel stated that the student/teacher ratio was above room capacity and ODE special education case load.</p>	<p><u>Individual Correction</u></p> <p>The district must reconvene the IEP teams of the four IEPs identified as noncompliant to review and include a justification for why the child was removed from the regular 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 regular classroom with supplementary aids and services. • Document that the nature or severity of the disability is such that education in regular education classes, even with the use of supplementary aids and services, cannot be achieved satisfactorily. • Describe potential harmful effects to the child or others, if applicable. <p><u>Systemic Correction</u></p> <p>The district must submit evidence to OEC of written procedures and practices in place regarding the least restrictive environment placement decision process.</p>	<p><input checked="" type="checkbox"/> No</p> <p>The district 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	
			OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.	
LRE-6	300.321(1)	<p><u>Record Review</u></p> <p>Two school age student IEPs did not indicate that the IEP Team included a parent.</p> <p>All preschool student IEPs indicated that the IEP Team included a parent.</p>	<p><u>Individual Correction</u></p> <p>For the two IEPs identified as noncompliant, the district must:</p> <ul style="list-style-type: none"> • Provide evidence of parent participation at the IEP meeting, or • Provide documentation of at least three attempts made by the district to ensure parent participation, or • Reconvene the IEP team to review the IEP with the parent. <p><u>Systemic Correction</u></p> <p>OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.</p>	<p><input checked="" type="checkbox"/> No</p> <p>The district does <u>not</u> need to address this finding in a Corrective Action Plan.</p>
LRE-7	300.321(2)	<p><u>Record Review</u></p> <p>Five school age and six preschool student IEPs did not indicate that the IEP Team included a regular education teacher.</p>	<p><u>Individual Correction</u></p> <p>For the 11 IEPs identified as noncompliant, the district must:</p> <ul style="list-style-type: none"> • Provide documentation that the parent was informed prior to the IEP meeting that the regular education teacher would not participate in the meeting, and • Provide a written excuse signed by the parents and the district that allowed the regular education teacher not to be in attendance at the IEP meeting, or • Reconvene the IEP team to review the IEP with all required members present. <p><u>Systemic Correction</u></p> <p>OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.</p>	<p><input checked="" type="checkbox"/> No</p> <p>The district 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	
LRE-8	300.321(3)	<p><u>Record Review</u></p> <p>Two school age student IEPs did not indicate that the IEP Team included a special education teacher.</p> <p>All preschool student IEPs indicated that the IEP Team included a special education teacher.</p>	<p><u>Individual Correction</u></p> <p>For the two IEPs identified as noncompliant, the district must:</p> <ul style="list-style-type: none"> • Provide documentation that the parent was informed prior to the IEP meeting that the special education teacher would not participate in the meeting, and • Provide a written excuse signed by the parents and the district that allowed the special education teacher not to be in attendance at the IEP meeting, or • Reconvene the IEP team to review the IEP will all required members present. <p><u>Systemic Correction</u></p> <p>OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.</p>	<p><input checked="" type="checkbox"/> No</p> <p>The district does <u>not</u> need to address this finding in a Corrective Action Plan.</p>
LRE-9	300.321(4)	<p><u>Record Review</u></p> <p>Three school age student IEPs did not indicate that the IEP Team included an LEA representative.</p> <p>All preschool student IEPs indicated that the IEP Team included an LEA representative.</p>	<p><u>Individual Correction</u></p> <p>For the three IEPs identified as noncompliant, the district must:</p> <ul style="list-style-type: none"> • Provide documentation that the parent was informed prior to the IEP meeting that the LEA representative would not participate in the meeting, and • Provide a written excuse signed by the parents and the district that allowed the LEA representative not to be in attendance at the IEP meeting, or • Reconvene the IEP team to review the IEP will all required members present. <p><u>Systemic Correction</u></p> <p>OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.</p>	<p><input checked="" type="checkbox"/> No</p> <p>The district 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	
LRE-10	300.321(5)	<p><u>Record Review</u></p> <p>Two school age student IEPs did not indicate that the IEP Team included a person qualified to interpret the instructional implications of evaluation results.</p> <p>All preschool student IEPs indicated that the IEP Team included a person qualified to interpret the instructional implications of evaluation results.</p>	<p><u>Individual Correction</u></p> <p>For the two IEPs identified as noncompliant, the district must:</p> <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 district 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 will all required members present. <p><u>Systemic Correction</u></p> <p>OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.</p>	<p><input checked="" type="checkbox"/> No</p> <p>The district does <u>not</u> need to address this finding in a Corrective Action Plan.</p>

ADDITIONAL FINDING:

During the interview process with staff and administrators and comments (spoken and written) from the Parent Public Meetings, it was verified that there is not a continuum of alternative placements based upon student need at the middle school and high school levels. There is a lack of a special education resource room setting for students who require the service.

Regulation: 3301-51-09 Delivery of services (C) Continuum of alternative placements (C) Continuum of alternative placements (1) Each school district must ensure that a continuum of alternative placements is available to meet the needs of children with disabilities for special education and related services. (2) The continuum required in paragraph (C)(1) of this rule must: (a) Include the alternative placements listed in the definition of special education under rule 3301-51-01 of the Administrative Code (instruction in regular classes, special classes, special schools, home instruction, and instruction in hospitals and institutions); and (b) Make provision for supplementary services (such as resource room or itinerant instruction) to be provided in conjunction with regular class placement.

Required Actions:

- ❖ The district must submit evidence to OEC of written procedures and practices in place regarding 3301-51-09
- ❖ OEC will contact the district for submission of additional data to verify compliance with this regulation.

This needs to be addressed in the corrective action plan.

Component 5: Discipline

Each school district shall ensure that if the child's behavior impedes his or her learning or the learning of others, the IEP team must specifically consider the child's behavioral needs.

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
DIS-1	300.530(e)(1)	<p><u>Record Review</u> All student records did show evidence that the district conducted a manifestation determination.</p> <p><u>Other Considerations</u> It was discussed that the district had all the documentation needed but the required forms need to be used in the future.</p>	<p><u>Individual Correction</u> None</p> <p><u>Systemic Correction</u> None</p>	<input checked="" type="checkbox"/> NA
DIS-2	300.530(e)(1)	<p><u>Record Review</u> All student records indicated that the manifestation determination was conducted within 10 school days of the district's decision to change the placement of a child with a disability.</p>	<p><u>Individual Correction</u> None</p> <p><u>Systemic Correction</u> None</p>	<input checked="" type="checkbox"/> NA
DIS-3	300.530(e)(1)	<p><u>Record Review</u> All student records did show evidence that, as part of the manifestation determination review, the team reviewed relevant information included in the student's file and the student's IEP.</p>	<p><u>Individual Correction</u></p> <p><u>Systemic Correction</u></p>	<input checked="" type="checkbox"/> NA
DIS-4	300.530(e)(1)	<p><u>Record Review</u> All student records did show evidence that, as part of the manifestation determination review, the IEP team reviewed relevant information presented by the parents and teacher observations.</p>	<p><u>Individual Correction</u> None</p> <p><u>Systemic Correction</u> None</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	
DIS-5	300.530(e)(1)(i) and (2)	<u>Record Review</u> All student records did show evidence that, as part of the manifestation determination review, the IEP team determined whether or not the conduct in question was caused by/or had a direct and substantial relationship to the child's disability.	<u>Individual Correction</u> None <u>Systemic Correction</u> None	<input checked="" type="checkbox"/> NA
DIS-6	300.530(e)(1)(i) and (2)	<u>Record Review</u> All student records did show evidence that, as part of the manifestation determination review, the IEP team determined whether or not the child's conduct was a direct result of the district's failure to implement the IEP.	<u>Individual Correction</u> None <u>Systemic Correction</u> None	<input checked="" type="checkbox"/> NA
DIS-7	300.530(e)(1)	<u>Record Review</u> All student records did indicate that the IEP team determined whether or not the child's conduct was a manifestation of the child's disability in accordance with the results of the manifestation determination review.	<u>Individual Correction</u> None <u>Systemic Correction</u> None	<input checked="" type="checkbox"/> NA
DIS-8	300.530 (f) (1) (i)-(ii)	<u>Record Review</u> No student records required that the district initiate a functional behavior assessment (FBA) after the manifestation determination.	<u>Individual Correction</u> None <u>Systemic Correction</u> None	<input checked="" type="checkbox"/> NA
DIS-9	300.530 (f) (1) (i)-(ii)	<u>Record Review</u> No student records required that the district implement a behavioral intervention plan (BIP) for a child as a result of the FBA.	<u>Individual Correction</u> None <u>Systemic Correction</u> None	<input checked="" type="checkbox"/> NA

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

Component 1: Statement of Accounts

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

Findings Citation	Evidence	Evidence of Correction		Must be addressed in CAP
		Required Actions	Date Due	
300.202	Parma City School District provided fiscal reports for the FY13 IDEA Part B and early childhood program year. The financial detail report (FINDET) was provided and aligned with the budget.	<u>Individual Correction</u> None <u>Systemic Correction</u> None		<input checked="" type="checkbox"/> NA

Component 2: Payroll Expenditures

The district/school is able to document that the 516 and 587 funds were expended in FY13 for an appropriate purpose; payroll expenditures are supported by Personal Activity Reports (PAR) showing the Time and Effort or Semi-Annual Certification; expense were properly coded to the correct function and object code; all staff in certified positions have appropriate licensure; all funded positions have position descriptions; district's ACCRPTs and budget are in agreement.

Findings Citation	Evidence	Evidence of Correction		Must be addressed in CAP
		Required Actions	Date Due	
300.202	The district provided an accounting report (ACCRPT) for the 96 employees being paid out of 516 IDEA funds and 2 staff members out of 587 funds. The number of employees consisted of regular fulltime, substitutes and stipends for those who attended professional development sessions. Semi-annual certification documentation for the previous year was reviewed confirming proper documentation was occurring. All staff in certified positions has appropriate licensures and all job descriptions were provided for the staff members being paid with IDEA funds. Most expenses were properly coded to the correct function and object code. One Speech Pathologist was coded with a 1237 function code. The code should be 2152. Please see Component 3 regarding function code 1237.	<u>Individual Correction</u> The district will review and respond to the incorrect function code identified in the Evidence of Findings column for FY13 Part B. <u>Systemic Correction</u> None		<input checked="" type="checkbox"/> No

Component 3: Non-Payroll Expenditures

The district/school is able to document that the 516 and 587 funds that were expended in FY13 for an appropriate purpose and reasonable for the program; that fiscal coding is appropriate and the funds were charged to the proper fund, function and object; that the district is able to document the expenditure with a purchase order, receipt statement or invoice.

Findings Citation	Evidence	Evidence of Correction		Must be addressed in CAP
		Required Actions	Date Due	
300.202	<p>Twenty-five (25) vouchers were provided by Parma and reviewed for FY13 fund 516.</p> <p>All of the special education instruction expenditures were coded with 1237- SLD (1247 for grades 7-12). The coding should be more precise and indicate more specifically the disability being addressed. For example, voucher 477865 was substitute services for a visually impaired student. The function code in this case should be 1233. Voucher 478180 was for a hearing system and should be coded 1232. Voucher 478331 for PT services should have been function code 2186.</p> <p>Also, the district using the Object Code generically as 511 Supplies or 519 Other. For example, voucher 477994 was for a Reading Program and was coded 511 Supplies. The item should probably have been coded as 516 or 525. Voucher 477782 was for a periodical subscription and should have been coded 54X. Voucher 478653 was for workbooks and should have been coded 52X. Voucher 477784 was a publication and should have been coded 54X.</p> <p>One voucher was provided by Parma and reviewed for FY13 fund 587.</p>	<p><u>Individual Correction</u> The district will review and respond to the incorrect function codes identified in the Evidence of Findings column for FY13 Part B.</p> <p><u>Systemic Correction</u> The district will develop a plan to ensure more precise and accurate function codes and object codes are utilized.</p>		<input checked="" type="checkbox"/> Yes

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

If the district/school expended FY13 516 and 587 funds for Capital Outlay and/or equipment, the district/school evidences that it has followed the board adopted procurement policy. The district must ensure that equipment and supplies placed in the non-public school are used for IDEA purposes only and can be removed from the non-public school without remodeling the school facility.

Findings Citation	Evidence	Evidence of Correction		Must be addressed in CAP
		Required Actions	Date Due	
300.202	The district presented a copy of its procurement policy and followed its procurement policy in the purchase of the equipment.	<u>Individual Correction</u> None <u>Systemic Correction</u> None		<input checked="" type="checkbox"/> NA

Component 5: Equipment inventory policy and procedures

The district/school retains control and administration of FY13 516 and 587 funds used to purchase materials, equipment and property (i.e., bus) purchased with those funds for the uses and purposes provided in the IDEA. The district is properly identifying equipment purchased with IDEA funds and is complying with Board Policy in cataloguing and inventorying the equipment. The district master list of equipment purchased with IDEA funds was updated within the last two years; the district has an equipment disposal policy; the district requested disposition instructions from ODE prior to disposing of assets with at fair market value of more than \$5,000.00, and sale proceeds were deposited back into the original grant.

Findings Citation	Evidence	Evidence of Correction		Must be addressed in CAP
		Required Actions	Date Due	
300.202	Parma provided an inventory list of nearly 1,500 items purchased with ARRA and Part B funds. The list included many items that were purchased prior to FY11. From this list, 35 items were located. Most of the items reviewed were located according to the list. The treasurer indicated that the district has recently decentralized the delivery of special education services. As students have been dispersed to more buildings, the inventory list has not been updated to match the changes. The inventory system is relatively good but needs some improvement.	<u>Individual Correction</u> None <u>Recommendation</u> The equipment inventory can be improved. The list must be regularly updated. <u>Systemic Correction</u> None		<input checked="" type="checkbox"/> NA

Component 6: Non-Public Count and Proportionate Share

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

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

Findings Citation	Evidence	Evidence of Correction		Must be addressed in CAP
		Required Actions	Date Due	
300.130 through 300.144	The district provided information for the 12 participating non-publics including the number of children evaluated, the number of children determined to be children with disabilities and the number of children served. Documentation was provided to demonstrate that timely discussions were held to address the needs of the students with the appropriate funding.	<u>Individual Correction</u> None <u>Systemic Correction</u> None		<input checked="" type="checkbox"/> NA

Component 7: Notification of Public Participation

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

Findings Citation	Evidence	Evidence of Correction		Must be addressed in CAP
		Required Actions	Date Due	
300.165 and Part 300.201	The district provided documentation that a public hearing would be held and provided adequate notice of the hearings for the general public including individuals with disabilities and parents of children with disabilities in planning the use of IDEA Part B funds. The meeting was held in May. However, the notice did not indicate there would be an opportunity for comment. The main purpose of the meeting is the opportunity for public input in the use of IDEA Part B funds.	<u>Individual Correction</u> None <u>Systemic Correction</u> In the current year when the district has the public hearing, it will emphasize the opportunity for comment at the public hearing notice and record any public comment that is provided. Parma City will provide evidence of this to the Department.		<input checked="" type="checkbox"/> Yes

Component 8: Redirection of funds

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

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

Findings Citation	Evidence	Evidence of Correction		Must be addressed in CAP
		Required Actions	Date Due	
300.205	The district redirected 15% of their IDEA funds for Coordinated Early Intervening Services. The district has a plan in place to utilize the funds for CEIS. The district needs to develop a coding method to track the expenditure of Part B funds for CEIS in its financial system and be able to create a report showing the expenditure of funds for CEIS, the number of students who were served and track and report on the number of students who subsequently received special education services.	<u>Individual Correction</u> None <u>Systemic Correction</u> The district will identify a code in the accounting system to track CEIS expenditures. It is recommended that a job code be created for CEIS expenditures. Also, function code 1920 should be used for instructional expenditures. The district will apply this code to all FY12 expenditures incurred to date and in the future.		<input checked="" type="checkbox"/> Yes

Gifted Components, OEC’s Review Findings, and District Required Actions

Component 1: Gifted Budget

- A. Based on Section 267.30.50 in Am. Sub. HB 153, did the district spend for services to identified gifted students at least the same amount of state funding that it received in fiscal year 2009 through unit funding?
- B. If the district in fiscal year 2009 received gifted student services from an ESC, and the ESC received gifted unit funding in fiscal year 2009, did the district either (a) obtain gifted student services from an ESC that are comparable to the gifted student services provided to the district with gifted unit funding in fiscal year 2009 by an ESC or (b) spend for services to identified gifted students an amount not less than the amount of gifted unit funding expended by an ESC in fiscal year 2009 for the district’s students?
- C. Did the district spend no less than their FY09 supplemental identification amount on gifted identification?

Citation	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
		Required Actions	
Section 267.30.50, Am. Sub. HB 153	Expenditure reports were provided by the district to demonstrate that fiscal year 2012 gifted spending was equal to or more than fiscal year 2009 unit funding. Expenditures exceeded the MOE requirement. OEC reviewed expenditure reports for identification. The district spent more than the required amount on gifted identification.	<u>Individual Correction</u> None <u>Systemic Correction</u> None.	<input checked="" type="checkbox"/> NA

Component 2: Gifted Identification

Per Ohio Revised Code 3324.04(B)(2), how does the district assure inclusion in screening and assessment procedures for minority and disadvantaged students, children with disabilities and children for whom English is a second language?

Citation	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
		Required Actions	
ORC 3324.04(B)(2)	OEC reviewed identification procedures. The district provided evidence to document that there are provisions in place to insure inclusion in screening and assessment procedures for minority and disadvantaged students, children with disabilities and children for whom English is a second language. Whole grade screening is provided for all second grade students.	<u>Individual Correction</u> None <u>Systemic Correction</u> None	<input checked="" type="checkbox"/> NA

Component 3: Roster and Written Education Plans and Attestation

Per Ohio Administrative Code 3301-51-15 (D)(4), does the district have a current written education plan (WEP) for each student reported as served? Does each WEP include the following components?

- Goals for the students for each service to be provided;
- Specified methods for evaluating progress toward goals;
- Method and schedule for reporting progress to parents;
- Staff responsible for ensuring delivery of each service prescribed;
- Policies regarding waiver of assignments and rescheduling of tests;
- Deadline for next review of WEP; and
- Copy of WEP to parents and staff responsible for providing service listed?

Citation	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
		Required Actions	
OAC 3301-51-15(D)(4)	WEPs for ten students were provided and reviewed. All required attributes were present on all WEPs.	<u>Individual Correction</u> None <u>Systemic Correction</u> None	<input checked="" type="checkbox"/> NA

Component 4: Equitable Services and Attestation

Are all district students who meet the written criteria for a gifted service provided an equal opportunity to receive that service? Each gifted service offered in the district must be available to all eligible students in each building in the district at that grade level.

Citation	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
		Required Actions	
ORC 3324.06(D)	Each gifted service offered in the district is available to all eligible students in each building in the district at that grade level.	<u>Individual Correction</u> None <u>Systemic Correction</u> None	<input checked="" type="checkbox"/> NA

Component 5: Acceleration and Attestation

Did the district provide evidence that they are implementing their acceleration policy?

Citation	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
		Required Actions	
ORC 3324.10	The district provided evidence that they are implementing their acceleration policy. OEC reviewed district acceleration policies and procedures. WAPs for early entrance to kindergarten, whole grade and subject acceleration were reviewed. OEC reviewed acceleration information available on the district web site. Evidence documented that the district is meeting this requirement.	<u>Individual Correction</u> None <u>Systemic Correction</u> None	<input checked="" type="checkbox"/> NA

Component 6: Gifted Intervention Specialists and Attestation

Do gifted intervention specialists (GIS) spend at least 75 percent of their time providing instruction directly to gifted students? Is the remainder of their time spent on other duties related to gifted education?

Citation	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
		Required Actions	
OAC 3301-51-15(E)(2)	Schedules for each gifted intervention specialist were reviewed. Each gifted intervention specialist spends at least 75% of the time providing instruction directly to gifted students and the remainder of the time on other duties related to gifted education.	<u>Individual Correction</u> None <u>Systemic Correction</u> None	<input checked="" type="checkbox"/> NA

Component 7: Requirement for Minutes of Service Attestation

Are all students receiving service from a GIS receiving at least 225 minutes of instruction per week (kindergarten through grade 5) or 240 minutes of instruction per week (grades 6-12) from the GIS?

Citation	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
		Required Actions	
OAC 3301-51-15(E)	Schedules for each gifted intervention specialist were reviewed. All students receiving service from a gifted intervention specialist receive at least 225(K-5) or 240(6-12) minutes of instruction per week.	<u>Individual Correction</u> None <u>Systemic Correction</u> None	<input checked="" type="checkbox"/> NA

Component 8: Licensure

Do all staff members assigned as gifted coordinators or GIS have gifted licensure, gifted endorsement or a gifted supplemental license?

Citation	Evidence of Findings	Evidence of Correction		Must be addressed in CAP
		Required Actions		
OAC 3301-51-15(E)(3), OAC 3301-51-15(E)(6)	Licenses for gifted personnel were reviewed. The gifted coordinator and gifted intervention specialists hold the appropriate licensure or endorsement.	<u>Individual Correction</u> None	<u>Systemic Correction</u> None	<input checked="" type="checkbox"/> NA

Component 9: Requirement for Regular Education Teacher Professional Development and Attestation

Are all general education teachers providing gifted services receiving professional development in teaching gifted students and ongoing assistance with curriculum development and instruction from a gifted specialist and is curriculum related to gifted services differentiated?

Citation	Evidence of Findings	Evidence of Correction		Must be addressed in CAP
		Required Actions		
OAC 3301-51-15(D)(3)(b)(i)	The district does not report any services by general education teachers so no professional development or support is required.	<u>Individual Correction</u> None	<u>Systemic Correction</u> None	<input checked="" type="checkbox"/> NA