

Preschool Special Education Team for State of Ohio Preschool Tier 4 Onsite Monitoring Review Summary Report

Franklin Local School District

IRN: 048843

Introduction

The Preschool Special Education team for the state of Ohio would like to extend appreciation to the Franklin Local School District staff for their efforts, attention and time committed to the Tier 4 Onsite Review process.

Definition of terms in this document:

Individual Correction refers to:

Record Review items which are deemed not compliant within the individual preschool student records (Evaluation Team Report (ETR) and Individualized Education Program (IEP)).

Systemic Correction refers to: Record Review items that meet or exceeded a 30 percent threshold across all children's records within each topic.

Overview

The following report is a summary of the Preschool Tier 4 Onsite Review conducted by the Preschool Special Education team (hereafter the PSE team) on May 14, 2024.

During the onsite review, the PSE team monitors the district's implementation of IDEA to ensure compliance and positive results for preschool students with disabilities. The primary focus of the review is to:

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

Your district's onsite review included the following specific areas:

- Delivery of Services/Least Restrictive Environment
- Part C to Part B Transition
- ETR and IEP

Data Source

During the review, the PSE team considered information from the following sources:

1. PS IDEA Monitoring Questions Responses and Evidence

The PSE team reviewed the district's submission of the PS IDEA Monitoring Questions Responses and accompanying evidence. Upon review the Department determined which questions/areas were deemed of concern.

2. Parent Input

Franklin Local School District mailed 49 letters of the PSE team's notification of review to all families with students with disabilities in the district. The district posted the notification of review on its website which included a link to a recorded presentation from the PSE team providing an overview of the preschool monitoring review process. The presentation also provides contact information and requests parents to provide comments to the PSE team regarding the special education program in their school. The notification of review was also posted on the Preschool Special Education IDEA Monitoring website.

The PSE team received 0 comments.

3. Record Review/IEP Verification

Prior to the onsite visit, the PSE team reviewed 7 records of preschool students with disabilities. The PSE team selected records of students with disabilities from a variety of disability categories. Five student records were selected for IEP verification in the classroom setting.

4. Staff/Administrative Input Survey

District administrators and staff participated in completing a Staff Input Survey. The survey focused on specific questions that allowed for all staff to provide input regarding district preschool special education policies, programming, procedures, and professional development.

The Department consultants received and reviewed surveys that were sent to the following groups of district and contracted staff:

- a. Administrators (Preschool Supervisor, Principal, Special Education Director): 3 sent and 3 received
- b. Teachers (General Education Lead Teachers) 4 sent and 4 received
- c. Paraprofessionals (Teaching Assistants, One to One Aides) 8 sent and 4 received
- d. Early Childhood Intervention Specialists 2 sent and 2 received
- e. Related Service Personnel (Occupational Therapists, Physical Therapists, Speech Language Pathologists, School Psychologists) 5 sent and 4 received

Department surveys focused on the following review areas: Part C to Part B Transition, Evaluation Team Report (ETR)/Individualized Education Program (IEP), and Delivery of Services/Least Restrictive Environment.

STRENGTHS/COMMENDATIONS:

During the on-site IEP Verifications and through conversations with staff, it was clear that staff working with preschool students with disabilities collaborate often, communicate with one another, and have dedicated meeting time to discuss students and their needs. Staff input survey responses and evidence provided through the PS IDEA Monitoring Questions showed that the district is in the beginning stages of their internal monitoring process. The district has begun to document the process within their OSS Handbook.

Findings of Noncompliance/Required Actions:

A finding is made when noncompliance is identified by the PSE team with IDEA and Ohio Operating Standards requirements. Individual noncompliance findings are identified through record review of evaluation team reports (ETRs) and/or individualized education programs (IEPs) requirements.

Individual Student Record Correction

The district has **60 school days** from the date of this summary report to correct all identified findings of noncompliance for individual students whose records were selected and reviewed by the PSE team. *Detailed information on individual findings is provided in Appendix A of this report.*

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

*Individual Student Record Correction Due Date: **December 18, 2024***

Corrective Action Plan (CAP)

Section 2 of this Summary Report contains a list of the specific criteria concerns. If a topic area notes specific criteria concerns, then the district must develop a plan and document what actions will occur within the plan. Please see Tier 4 PS IDEA Monitoring Process Guide for CAP completion instructions.

An approved form for the CAP will be provided by the Department.

The district must submit the CAP to the PSE team through FileDrop within **30 school days** from the date of this report. The PSE team will review the corrective action plan submitted by the district for approval. If the PSE team determines that a revision(s) is necessary, the district will be required to revise and resubmit. The district will be notified by the PSE team when the CAP has been approved. The Corrective Action Plan must be *completed* within one year from the delivery of the Summary Report.

*CAP submission Due Date: **October 29, 2024***

Completion of CAP Activities:

The district will provide the PSE team with documentation verifying the district's completion of all CAP activities and all systemic corrections noted in this summary report. The PSE team will verify completion of all CAP activities through the review of the district's submitted documentation.

The district will be required to demonstrate completion of CAP activities within the given timelines in the district's summary report. When the district has completed all individual record corrections and completed all the CAP activities, the district will complete and submit the Verification of Individual Correction and CAP Completion Form to the Preschool Special Education team.

Please note this date may fluctuate depending upon if revisions are needed for the CAP.

*Evidence of completion of all CAP activities: **April 4, 2025***

*Submission of Verification of Individual Correction and CAP Completion Form Due Date (submitted once received from PSE contact): **April 25, 2025***

Systemic Correction:

The PSE team will verify systemic record corrections through the review of additional preschool student records. *A complete list of the record review items that will be reviewed for systemic record corrections will be included in Appendix A.*

Please note this date may fluctuate depending upon if revisions are needed for the CAP and or preschool student records require additional corrections.

*Systemic student records submission Due Date: **May 13, 2025***

Once the district has completed all CAP activities and systemic corrections, the district will use the PSE team's monitoring process to create and implement an Improvement Plan.

*Improvement Plan Due Date: **October 27, 2025***

For questions regarding the review, please contact: Sarah Coxson, the PSE team's IDEA Monitoring Contact, by telephone at 614-995-5287 or by e-mail at sarah.coxson@childrenandyouth.ohio.gov.

SECTION 2: Review Findings and Required Actions for Systemic Corrections

| Topic Area | Evidence of Findings From all 5 Data Sources | Criteria Concerns Specific concerns from each data source | Must be Addressed in CAP Yes or No |
|--|---|---|---|
| DELIVERY OF SERVICES/ LEAST RESTRICTIVE ENVIRONMENT | <p>PS IDEA Monitoring Questions: 2 “no” responses out of 7 applicable questions within Section 1 and Section 2 (2 questions Not Rated)</p> <p>Parent Input Survey: No parent concerns submitted</p> <p>Record Reviews: Across all records reviewed, 6 items exceeded the 30 percent threshold out of 8 applicable items</p> <p>IEP Verifications: Two questions asked during IEP verifications align to this topic area. Across all 5 IEPs verified, one IEP verification had a concern across two questions</p> <p>Staff Input Surveys: 17 surveys received. An item is noted as a concern if it has at least 50 percent of respondents disagree or strongly disagree to the statement or if</p> | <p>Concern 1:</p> <ul style="list-style-type: none"> • PS IDEA Monitoring Questions Section 1 <ul style="list-style-type: none"> ○ DS/LRE-2: No documentation provided to evidence the district makes a full continuum of options available and the district did not submit the required Preschool Continuum of LRE Placement Options Form • Record Review Items: <ul style="list-style-type: none"> ○ LRE-1: 80 percent of student records do not provide a statement, within the PR-01, describing the placement decision determined by the IEP team ○ LRE-2: 100 percent of student records do not describe why the child cannot be provided services in the general education classroom and it is not made clear where and when the child will be removed • Staff Input Survey- Staff disagreed that: <ul style="list-style-type: none"> ○ The district makes a full continuum of options available <p>Concern 2:</p> <ul style="list-style-type: none"> • PS IDEA Monitoring Questions Section 1 <ul style="list-style-type: none"> ○ DS/LRE-8: The district does not have written procedures in place to ensure data regarding | <p>YES</p> |

| Topic Area | Evidence of Findings From all 5 Data Sources | Criteria Concerns Specific concerns from each data source | Must be Addressed in CAP Yes or No |
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| | any statement aligned with an identified area of concern | <p>preschool educational environments are accurately entered into Education Management System (EMIS). Evidence submitted did not evidence the three bullet criteria from the Monitoring Questions.</p> <p>Concern 3:</p> <ul style="list-style-type: none"> • Record Review Items: <ul style="list-style-type: none"> ○ DS-7: 80 percent of student records do not show that SDI equals the required 1 hour per week and not clear when those monthly minutes of SDI will be given. ○ DS-8: 100 percent of applicable student records do not address a description of the AT service and how it meets the child’s need ○ DS-9: 100 percent of applicable student records do not describe the condition for, and extent of each accommodation listed ○ DS-11: 100 percent of applicable student record do not clarify when the support to school personnel will be provided or who will receive the support. • IEP Verifications: <ul style="list-style-type: none"> ○ Question 2 SDI: <i>Is teacher or RS provider providing the strategies as listed in the SDI section of the IEP?</i> <ul style="list-style-type: none"> ▪ 1 related service provider stated she was providing a strategy, use of peer models, to | |

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| | | <p>support the student that was not documented in the student's IEP.</p> <ul style="list-style-type: none"> ○ Question 2 Accommodations: Are accommodations listed on the IEP? Are accommodations being provided as listed on the IEP? <ul style="list-style-type: none"> ▪ 1 related service provider stated there were no specific accommodations for a child who does have accommodations in the IEP. ● Staff Input Surveys- Staff disagreed that: <ul style="list-style-type: none"> ○ The district ensures Early Childhood Intervention Specialists or Related Service Personnel support lead teachers in general education classrooms. <p><u>Not Rated: (These questions are not rated because they are dependent upon a previous question. These items will need to be addressed in the district's Improvement Plan.)</u></p> <ul style="list-style-type: none"> ○ DS/LRE-3: Do preschool staff receive professional development and/or training regarding the district's continuum of options and making placement decisions? ○ DS/LRE-4: Does the district use a list of the available preschool education service options in the community to inform discussions and decisions on placement? | |

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|------------|--|--|---------------------------------------|
| | | <p><u>Opportunities for Improvement</u></p> <ul style="list-style-type: none"> • Question DS/LRE-1: Within the district’s staff and parent handbook policies and or procedures, the district should detail: Free Appropriate Public Education, (FAPE), <i>access to general education</i>. Specifically, that in addition to special education and related services, preschool student with disabilities have access to the general education curriculum. • Question DS/LRE-6: The district should document the number of required hours of general education instruction and special education based upon the setting that the Individualized Education Program (IEP) team determined for each child. Refer to Preschool Universal Supports IEP Part 2 and IEP Part 3 for guidance. The time and frequency of support for school personnel should be documented and made clear. • DS/LRE-9: District submitted handbooks show evidence that transportation is provided to preschool children. When documenting transportation in Section 8 of the IEP, the district should refer to Preschool Universal Supports IEP Part 3 and resources on the Preschool Special Education Webpage for guidance. • Staff Input Surveys: <i>Staff disagreed that:</i> | |

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| PART C TO PART B TRANSITION | | <ul style="list-style-type: none"> ○ I am an active member, and my voice is considered within the school, and when it involves best servicing students. ○ The district has written policies and procedures that comply with state and federal rules to ensure that children are receiving a free and appropriate public education in the least restrictive environment. ○ From additional staff survey comments, staff noted the need for continued development of district preschool special education processes and procedures. | |
| | <p>PS IDEA Monitoring Questions: 4 “no” responses out of 4 applicable questions within Section 1 and Section 2</p> | <p>Concern 1:</p> <ul style="list-style-type: none"> • PS IDEA Monitoring Questions Section 1: | YES |

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|------------|--|---|------------------------------------|
| | <p>Parent Input Survey: No parent concerns submitted</p> <p>Record Reviews: Across all records reviewed, 1 item exceeded the 30 percent threshold out of 1 applicable item</p> <p>IEP Verifications: This topic area is not applicable to the questions asked during IEP verifications</p> <p>Staff Input Surveys: 17 surveys received. An item is noted as a concern if it has at least 50 percent of respondents disagree or strongly disagree to the statement or if any statement aligned to an identified area of concern</p> | <ul style="list-style-type: none"> ○ C/B-1: There is no written policy or procedure documenting following procedures for any noncompliance finding. Who, what, when, where? ○ C/B-4: No written procedures to ensure data regarding Part C to Part B is accurately entered into EMIS ● Staff Input Surveys- Staff disagreed that: <ul style="list-style-type: none"> ○ Part C to Part B Transition: Someone is responsible for tracking and ensuring timelines are met ○ A person is responsible to ensure the key personnel are following the requirements and procedures for Children transitioning from Part C Early Intervention to Part B ● Staff Input Survey- Additional staff comment: <ul style="list-style-type: none"> ○ Staff noted the lack of a clear process for tracking timelines for children transitioning form Part C to Part B <p>Concern 2:</p> <ul style="list-style-type: none"> ● PS IDEA Monitoring Questions Section 1: <ul style="list-style-type: none"> ○ C/B-2: The Interagency Agreement does not include signatures from all required partners (required partners are LEA, Head Start, and the agency responsible for Part C) | |

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| | | <ul style="list-style-type: none"> ○ C/B-3: No documentation to show partners meet annually to review and revise the Interagency Agreement ● Staff Input Survey- Staff disagreed that: <ul style="list-style-type: none"> ○ The district has various methods it uses to engage with Part C/EIS providers to improve educational children with disabilities ● Record Review Item: <ul style="list-style-type: none"> ○ CF-1: 40 percent of student records do not utilize child information from Part C in suspecting or when determining eligibility for Part B services <p>Opportunities for Improvement:</p> <ul style="list-style-type: none"> ● Question C/B 1: Within the county’s Interagency Agreement and/or the district’s preschool policies, more specific language could be added to address that, the IEP team must consider extended school year services as part of the IEP process for children transitioning from Part C services See Rule 3301-51-11(3)(e) | |

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| | | | |
| EVALUATION TEAM REPORT (ETR) AND INDIVIDUALIZED EDUCATION PROGRAM (IEP) | <p>PS IDEA Monitoring Questions: 4 “no” responses out of 5 applicable questions within Section 1 and Section 2 (1 question Not Rated)</p> <p>Parent Input Survey: No parent concerns submitted</p> <p>Record Reviews: Across all records reviewed, 13 items exceeded the 30 percent threshold out of 16 applicable items</p> <p>IEP Verifications: Two questions asked during IEP verifications align to this topic area. Across all 5 IEPs verified, 1 IEP verification had a concern across two questions</p> <p>Staff Input Surveys:</p> | <p>Concern 1:</p> <ul style="list-style-type: none"> • PS IDEA Monitoring Questions Section 1: <ul style="list-style-type: none"> ○ ETR/IEP-1: The district does not have policies or procedures that clearly describes the procedures for Child Find, Evaluations, Individualized education program (IEP) and Delivery of Services for preschool students with disabilities • Staff Input Survey- Staff disagreed that: <ul style="list-style-type: none"> ○ There is a process or guidelines the ETR planning team uses to determine if any additional data or assessments are needed to complete the evaluation • Staff Input Survey- Additional staff comments: <ul style="list-style-type: none"> ○ Staff noted that previously there has been inaccurate information presented regarding preschool special education processes ○ Staff noted that there is a lack of clarity around writing compliant preschool ETRS and IEPs verse what is required for compliant school age ETRS and IEPs | <p>YES</p> |

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|------------|--|---|------------------------------------|
| | <p>17 surveys received. An item is noted as a concern if it has at least 50 percent of respondents disagree or strongly disagree to the statement or if any statement aligned with an identified area of concern</p> | <p>Concern 2:</p> <ul style="list-style-type: none"> • PS IDEA Monitoring Questions Section 1: • ETR/IEP-3: The district does not use data from its internal system of reviewing ETRs and IEPs to make policy/procedure/process changes • ETR/IEP-5: The district did not provide a record that has gone through the <i>district's</i> internal monitoring process • Staff Input Survey- Staff disagreed that: <ul style="list-style-type: none"> ○ The district reviews preschool Evaluation Team Reports (ETRs) and Individualized Education Programs (IEPs) for compliance ○ Additional Staff Comment: Staff noted the need for a more structured preschool internal monitoring team <p>Concern 3:</p> <ul style="list-style-type: none"> • PS IDEA Monitoring Questions Section 1: • ETR/IEP-4: The district answered “no” to the question: Do all necessary preschool staff receive professional development on writing compliant preschool Evaluation Team Reports (ETRs) and Individualized Education Programs (IEPs)? | |

| Topic Area | Evidence of Findings From all 5 Data Sources | Criteria Concerns Specific concerns from each data source | Must be Addressed in CAP Yes or No |
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| | | <ul style="list-style-type: none"> • Staff Input Survey- <i>Staff disagreed that:</i> <ul style="list-style-type: none"> ○ The district provides targeted professional development to support staff on writing compliant preschool Evaluation Team Reports (ETRs) and Individualized Education Programs (IEPs) <p>Concern 4: Record Review Items:</p> <ul style="list-style-type: none"> • CF-2: 100 percent of applicable student records Part 2 intervention summaries did not include the 5 components from the Record Review Guide, required when summarizing interventions • CF-4: 71 percent of student records had assessments completed that were not documented on the planning form and unclear if assessments were completed after consent • CF-5: 100 percent of student records evaluation reports did not address all areas noted on the planning forms • CF-6: 100 percent of student records summary of assessment results lacks specific information to allow anyone to create academic and/or functional goals for this student • CF-7: 86 percent of student records did not contain a true summary of needs stated in parent friendly language. The educational needs are generic in nature and not individualized based on the summary of assessment results | |

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| | | <ul style="list-style-type: none"> • CF-8: 71 percent of student records implications for instruction are generic in nature and not specific to the needs of this child • CF-10: 100 percent of student records justification for the eligibility determination statement did not provide a justification for the eligibility determination decision describing how the student meets or does not meet the suspected disability category(s) • DS-2: 100 percent of student records Present levels of performance do not provide a detailed and targeted summary of current daily academic/behavior and /or functional performance related to the development of measurable goals; OR there is no comparison to grade-level or age- appropriate performance expectations • DS-3: 100 percent of student records annual goals are not stated in measurable terms • DS-4: 40 percent of student records do not address all identified ETR needs in the IEP goals • DS-12: 80 percent of student records do not show evidence of data collection on each annual goal, progress reports/analysis; and/OR There is no evidence that the progress data for each annual goal was reported; OR Progress reported does not align to measurement(s) used in the annual goal statement • DS-13: 100 percent of applicable student records had data indicating the need for revision were available (goal was | |

| Topic Area | Evidence of Findings From all 5 Data Sources | Criteria Concerns Specific concerns from each data source | Must be Addressed in CAP Yes or No |
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| | | <p>mastered or no progress was made), but no revisions were evident</p> <ul style="list-style-type: none"> • DS-14: 60 percent of student records did not evidence involvement of the general education teacher in the IEP meeting <p>IEP Verifications:</p> <ul style="list-style-type: none"> • Question 1 IEP Implementation: <i>Evidence when asked by observer that teacher and any related service (RS) providers were not aware of contents of IEPs for which they are responsible and what should be implemented within the setting (such as classroom, therapy room)</i> <ul style="list-style-type: none"> ▪ 1 staff did not state a gross motor goal for a child who has a gross motor goal in the IEP <p>Staff Input Surveys- <i>Staff disagreed that:</i></p> <ul style="list-style-type: none"> • As the person who works closely with the students, my input is considered when planning and developing the students' IEP • I am part of the team coordinating and synthesizing the information from the reports into the team summary | |

| Topic Area | Evidence of Findings From all 5 Data Sources | Criteria Concerns Specific concerns from each data source | Must be Addressed in CAP Yes or No |
|------------|--|---|---------------------------------------|
| | | <p><u>Not Rated: (These questions are not rated because they are dependent upon a previous question. These items will need to be addressed in the district's Improvement Plan.)</u></p> <ul style="list-style-type: none"> ○ ETR/IEP-6: Based on results of data does the district have targeted professional development to support staff on writing compliant preschool Evaluation Team Reports (ETRs) and Individualized Education Programs (IEPs)? ○ ETR/IEP-1: The district does not have policies or procedures that clearly describes the procedures for Child Find, Evaluations, Individualized education program (IEP) and Delivery of Services for preschool students with disabilities. ● Staff Input Survey- Staff disagreed that: <ul style="list-style-type: none"> ○ There is a process or guidelines the ETR planning team uses to determine if any additional data or assessments are needed to complete the evaluation. ● Staff Input Survey- Additional staff comments: <ul style="list-style-type: none"> ○ Staff noted that previously there has been inaccurate information presented regarding preschool special education processes. ○ Staff noted that there is a lack of clarity around writing compliant preschool ETRs and IEPs verse | |

| Topic Area | Evidence of Findings From all 5 Data Sources | Criteria Concerns Specific concerns from each data source | Must be Addressed in CAP Yes or No |
|------------|--|---|---------------------------------------|
| | | <p>what is required for compliant school age ETRS and IEPs.</p> <p>Opportunities for Improvement:</p> <ul style="list-style-type: none"> • Question ETR/IEP-1: Within the district’s policies and or procedures the district should clearly describe the procedures for Child Find, Evaluations, Individualized education program (IEP) and Delivery of Services for preschool students with disabilities. If the current procedures cover both preschool and school age, then it should be made clear within. • Question ETR/IEP-3: The district is in the beginning stages of their internal monitoring process. It would be helpful for the district to record data, even if baseline data, from their internal system of record reviews and then the action(s) the district’s internal monitoring team will take based upon the data collected. This data will help the internal monitoring team determine if processes need to be revised in order to improve outcomes. | |