

Bradford Exempted Village School District IRN 045229

**Ohio Department of Education, Office for Exceptional Children
2011-2012 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 November 8-10, 2011 by the Ohio Department of Education's Office for Exceptional Children (OEC) and Office of Early Learning and School Readiness 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 November 8-10, 2011. During the IDEA Review OEC consultants monitor the LEA's implementation of the 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;
- Data Verification.

Data Sources

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

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

On October 20, 2011, Bradford Exempted Village Schools mailed 141 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 October 20, 2011 on the district's website.

On November 8, 2011, 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. No parents and one State Support Team (SST) Region 10 representative attended the public meeting. Attendees could speak to OEC representatives publicly in the meeting or individually, provide written comments, or both. No parents or other attendees made comments during the public meeting. Written comment forms were available before, during and after the meeting. OEC received no written comments.

2. Pre-Onsite Data Analysis

OEC 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 November 8, 2011, OEC consultants reviewed 36 records of school age students with disabilities. An OELS&R consultant, on November 8, reviewed four records as part of the Early Childhood Special Education Review. OEC selected records of a variety of children with disabilities from three buildings.

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

4. Staff/Administrative Interviews

On November 9, OEC consultants held three sessions of interviews with eight administrators and nineteen teachers, school counselors, related services personnel and school psychologists. OEC interviews focused on the following review areas: Child Find; Delivery of Services; Least Restrictive Environment (LRE) and IEP alignment.

Findings

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 of 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 Bradford Exempted Village 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 John Magee, OEC Lead Consultant at john.magee@ode.state.oh.us 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: 03-20-2012

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: 05-04-2012

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: 02-02-2013

For questions about specific components of this report please contact:

- **Special Education School Age:** John Magee, OEC Lead Consultant, at (614)-728-1115, toll-free at (877) 644-6338, or by e-mail at john.magee@ode.state.oh.us .
- **Special Education Early Childhood:** Barbara Weinberg, Educational Consultant, at (614) 387-2239, toll-free at (877) 644-6338, or by e-mail at Barbara.Weinberg@ode.state.oh.us.
- **Fiscal:** Paul Sogan, Educational Consultant, at (614)-728-2098, toll-free at (877) 644-6338, or by e-mail at paul.sogan@ode.state.oh.us.
- **Gifted Education:** Rosemary Pearson, Educational Consultant, at (614)-644-2641, toll-free at (877) 644-6338, or by e-mail at rosemary.pearson@ode.state.oh.us.

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 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)	<u>Record Review</u> All school age and pre-school record(s) indicated that reevaluations were completed within the three year timeline.	<u>Individual Correction</u> None <u>Systemic Correction</u> None	<input checked="" type="checkbox"/> NA
CF-2	300.305(a)	<u>Record Review</u> All preschool evaluation record(s) of children transitioning from Part C, utilized child information from the Individual Family Service Plan (IFSP) and other documentation provided by Help Me Grow in suspecting or when determining eligibility for Part B supports and services.	<u>Individual Correction</u> None <u>Systemic Correction</u> None	<input checked="" type="checkbox"/> NA
CF-3	OAC 3301-51-06 (2) and OAC 3301-51-06(4)	<u>Record Review</u> All school age initial evaluations appropriately documented interventions provided to resolve concerns for the child performing below grade-level standards.	<u>Individual Correction</u> None <u>Systemic Correction</u> None	<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	
CF-4	300.501(b)(1)	<p><u>Record Review</u> Three school age record(s) did not show evidence that the evaluation planning team included the parent.</p> <p>All pre-school evaluations provided evidence that the evaluation planning team included the parent.</p> <p><u>Interviews</u> Interviews revealed that parents are a part of the evaluation team and that information is collected beginning with the IAT process and continuing through the evaluation process.</p> <p><u>Other Considerations</u> Staff reported that parent participation varies. Some parents are more involved than others. Teachers do all they can to engage the parents. Home visits are conducted in addition to telephone calls and letters.</p>	<p><u>Individual Correction</u> 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><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.
CF-5	300.305(a)(1)	<p><u>Record Review</u> Two school age evaluations did not provide evidence that the evaluation planning team reviewed existing data on the child.</p> <p>All pre-school evaluations provided evidence that the evaluation planning team reviewed existing data on the child.</p> <p><u>Interviews</u> Interviews revealed that existing data on the child is reviewed and if additional testing needs to be conducted, parental permission is requested and a PR-01 is sent to the parent explaining the need for further data collection.</p>	<p><u>Individual Correction</u> 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> 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.

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
CF-6	300.305(a)(2)	<p><u>Record Review</u></p> <p>Two school age evaluations did not provide evidence that the evaluation planning team identified what additional data, if any, were needed.</p> <p>All pre-school evaluations provided evidence that the evaluation planning team identified what additional data, if any, were needed.</p> <p><u>Interviews</u></p> <p>Interviews revealed that information is sought from teachers and parents. If additional testing needs to be conducted, parental permission is requested. If something needs to be changed or added, it is added to the planning chart and permission is obtained from the parent. Nothing is changed or added without parental consent.</p>	<p><u>Individual Correction</u></p> <p>The district must provide the evaluation planning form or evidence documenting that 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 evaluation did not provide evidence that the evaluation addresses all areas related to the suspected disability.</p> <p>All pre-school evaluations provided evidence that the evaluation planning team addressed all areas related to the suspected disability.</p> <p><u>Interviews</u></p> <p>The school psychologist uses a check-list of assessments related to specific disability categories to insure that all areas of evaluation are addressed.</p>	<p><u>Individual Correction</u></p> <p>The district will convene the ETR team to conduct a reevaluation or 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>Three school age 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 pre-school evaluations provided evidence that the parent of the child was involved in determining whether the child is a child with a disability.</p> <p><u>Interviews</u></p> <p>Parents are invited to the ETR meeting. If the parent doesn't show up, the meeting is held and the ETR form is sent home for the parent to review and sign the ETR. Regular education teachers are invited to the ETR meeting and their data is input into the report as well.</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 and all preschool 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><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-10	300.306(a)(1); 300.305(a); and 3301-51-01 (B)(21)	<p><u>Record Review</u></p> <p>Three school age reevaluation(s) 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>All pre-school evaluations provided 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>

Additional Considerations:

Please note, the following information does not constitute a finding and does not require corrective action in the formal process. However, the district may want to consider a revision of policies and procedures to address the issue.

During the record review, ODE staff found that several records included reevaluations that were completed without obtaining informed parental consent for reevaluation. All of the records in question contained evaluation plans that indicated additional testing was not needed. However, the evaluation plans also identified the need to complete individual observations for the some student as a necessary part of the reevaluation. While the IDEA regulation in 34 CFR 300.300 allows districts to complete reevaluations without obtaining informed consent when reviewing existing data only, the administration of any additional test or other assessment, such as individual observations for evaluation purposes, *requires informed parental consent*.

The district would be well-advised to review and re-write any evaluation policies and procedures to clarify this issue for the future.

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>Four school age IEPs did not address how the child’s disability affects his/her involvement and progress in the general education curriculum.</p> <p>All pre-school IEPs addressed how the child’s disability affects his/her involvement and progress in the general education curriculum.</p> <p><u>Interviews</u></p> <p>Staff reported that the profile usually has a statement on how the child’s disability affects his/her access to the regular education classroom. This statement is used to communicate with the regular education teacher about the student’s strengths and weaknesses. Short at-a-glance forms are shared with the regular education teachers to inform them about the student’s identified disability, their goals, accommodations, and modifications, and etcetera.</p> <p><u>Other Considerations</u></p> <p>It was reported by a majority of the interviewees that there is good communication among staff. They agreed that this is a benefit of being in a smaller district.</p>	<p><u>Individual Correction</u></p> <p>The district must reconvene the IEP team(s) of the four 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>

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
DS-2	300.320(a)(1)	<p><u>Record Review</u></p> <p>Twelve school age and three preschool IEPs did not contain Present Levels of Academic Achievement and Functional Performance (PLOP) that addressed the needs of the student.</p> <p><u>Interviews</u></p> <p>Interviews revealed that the information generated for the PLOP is developed through teacher evaluations and assessments to determine how the student is performing.</p>	<p><u>Individual Correction</u></p> <p>The district must reconvene the IEP teams of the fifteen 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>The district must submit evidence to OEC of written procedures and practices in place regarding the review of current academic/functional data when writing IEPs.</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>
DS-3	300.320 (a)(2)(i)(A)	<p><u>Record Review</u></p> <p>Two school age IEPs did not contain annual goals that address the child's academic area(s) of need. All pre-school IEPs contained annual goals that addressed the child's academic area(s) of need.</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 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.</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	
DS-4	300.320(a)(2)(i) (A)	<p><u>Record Review</u></p> <p>Five school age IEPs did not contain annual goals that address the child's functional area(s) of need. All pre-school IEPs contained annual goals that addressed the child's functional area(s) of need.</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 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</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>	<input checked="" type="checkbox"/> No <p>The district does <u>not</u> need to address this finding in a Corrective Action Plan.</p>
DS-5	300.320(a)(2)(i)	<p><u>Record Review</u></p> <p>Eleven school age student and two preschool student IEPs did not contain measurable annual goals.</p> <p><u>Interviews</u></p> <p>Interviews revealed that a discussion occurs between regular education classroom teachers and intervention specialists before goals are developed. One of the factors considered is the type of curriculum being delivered for the child, e.g., a functional curriculum for life skills such as counting money. The teachers also consider where the skill is being taught. If in a regular classroom, what will the regular education classroom teacher need to differentiate instruction for the student? In addition, district personnel use a measurable goals check list to ensure all elements are present.</p>	<p><u>Individual Correction</u></p> <p>The district must reconvene the IEP teams of the thirteen 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 of 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 of 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>	<input checked="" type="checkbox"/> Yes <p>A Corrective Action Plan is required due to meeting the 30% threshold of non-compliance. Action Plan.</p>

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
DS-6	300.320(a)(4)	<p><u>Record Review</u> Twelve school and four preschool IEPs did not contain a statement of specially designed instruction that addresses the needs of the child and supports annual goals.</p> <p><u>Interviews</u> Interview respondents indicated that factors considered in developing the specially designed instruction include the nature and outcomes of the goal, the anticipated method of delivery, and the individual needs of the student.</p>	<p><u>Individual Correction</u> The district must reconvene the IEP teams of the sixteen 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> The district must submit evidence to OEC of written procedures and practices in place regarding the IEP process of determining specially designed instruction. 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.
DS-7	300.320(a)(7)	<p><u>Record Review</u> Seven school age and one preschool student IEPs did not indicate the location where the specially designed instruction will be provided.</p> <p><u>Interviews</u> Staff members look at the most natural place for the student to learn the skills identified. They also look at frequency and level of intensity to meet the needs of the child.</p>	<p><u>Individual Correction</u> The district must reconvene the IEP teams of the eight IEP identified as noncompliant to review and amend the location where the specially designed instruction will be provided.</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.
DS-8	300.320(a)(7)	<p><u>Record Review</u> Five school age student IEP did not indicate the amount of time and frequency of the specially designed instruction. All pre-school student IEPs indicated the amount of time and frequency of the specially designed instruction.</p>	<p><u>Individual Correction</u> 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> 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.

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
DS-9	300.320(a)(4)	<p><u>Record Review</u> Six school age IEPs did not identify related services that address the needs of the child and support the annual goals. All pre-school IEPs identified related services that address the needs of the child and support the annual goals.</p> <p><u>Interviews</u> Staff members referred to ongoing communications that address changing student needs regarding the provision of related services</p>	<p><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 related services that were identified as needed in the IEP.</p> <p><u>Systemic Correction</u> The district must submit evidence to OEC of written procedures and practices in place regarding the IEP process of addressing identified related service needs. 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.
DS-10	300.320(a)(7)	<p><u>Record Review</u> Three school age and one preschool IEP did not indicate the location where the related services will be provided.</p>	<p><u>Individual Correction</u> The district must reconvene the IEP teams of the four 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> 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.

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
DS-11	300.320(a)(7)	<p><u>Record Review</u></p> <p>Three school age IEPs did not indicate the amount of time and frequency of the related services to be provided.</p> <p><u>Interviews</u></p> <p>A staff member reported that the amount of time and frequency a student receives for a related service is based upon the child's need and how much time is needed to work on a particular goal, such as their gait, eye-hand coordination, and/or balance. Factors considered in making this decision are the student's ability level, attention span and complexity of the skill being taught. In addition, the related service providers reported that they do not want to remove a student from their academic classes any longer than absolutely necessary.</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 on the IEP the amount of time and frequency of the related services to 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>

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></p> <p>All school age and all preschool IEPs identified assistive technology to enable the child to be involved in and make progress in the general education curriculum.</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></p> <p>All school age IEPs identified accommodations provided to enable the child to be involved in and make progress in the general education curriculum</p> <p><u>Interviews</u></p> <p>All staff reported that communication about the student's needs is ongoing throughout the district so that students receive the services they need. Middle school and high school staff reported that students will sometimes tell the teachers that they no longer want the accommodations or modifications listed in the IEP. In this instance, a discussion is held with the student and the parent and there is usually a trial period to see how the student performs without the accommodation and/or modification. The refusal of services is documented by the teacher and is shared with the parent. If an amendment needs to be made on the IEP then the team is reconvened to address this.</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	
LRE-3	300.320(a)(4)	<p><u>Record Review</u></p> <p>Seven 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 pre-school IEPs identified related services that address the needs of the child and support the annual goals.</p> <p><u>Interviews</u></p> <p>Elementary staff reported that information is taken from the ETR, along with recommendations from the team in order to determine what modifications if any are needed for the child. Teachers often develop modifications based on the child's needs after the initial IEP using documentation of what worked and what did not work for that particular student.</p>	<p><u>Individual Correction</u></p> <p>The district must reconvene the IEP teams of the seven 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></p> <p>The district must submit evidence to OEC of written procedures and practices in place regarding modifications.</p> <p>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.
LRE-4	300.320(a)(4)	<p><u>Record Review</u></p> <p>All school age and all preschool 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>Individual Correction</u></p> <p>None</p> <p><u>Systemic Correction</u></p> <p>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	
LRE-5	300.320(a)(5)	<p><u>Record Review</u></p> <p>Eleven school age IEP(s) 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 pre-school 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>Interviews revealed that each child is looked at individually to determine where the child needs to be placed in order to be successful. This philosophy is also used when determining the appropriate placement for students with behavioral issues. When a student's behavior begins affecting the student or other students' ability to learn, that student is moved to a more restrictive environment; however, the restrictions need to be as minimal as possible so that the transition is a smooth process for the student.</p>	<p><u>Individual Correction</u></p> <p>The district must reconvene the IEP teams of the eleven 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 least restrictive environment placement decision process.</p> <p>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.
LRE-6	300.321(1)	<p><u>Record Review</u></p> <p>All school age student and all preschool student IEPs indicated that the IEP Team included a parent.</p>	<p><u>Individual Correction</u></p> <p>None</p> <p><u>Systemic Correction</u></p> <p>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	
LRE-7	300.321(2)	<p><u>Record Review</u></p> <p>Three school age IEPs did not indicate that the IEP Team included a regular education teacher.</p> <p>All pre-school student IEPs indicated that the IEP Team included a regular education teacher.</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 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 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>	<input checked="" type="checkbox"/> No <p>The district does <u>not</u> need to address this finding in a Corrective Action Plan.</p>
LRE-8	300.321(3)	<p><u>Record Review</u></p> <p>Two school age IEPs did not indicate that the IEP Team included a special education teacher.</p> <p>All pre-school 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>	<input checked="" type="checkbox"/> No <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-9	300.321(4)	<u>Record Review</u> All school age and all preschool IEPs indicated that the IEP Team included an LEA representative.	<u>Individual Correction</u> None <u>Systemic Correction</u> None	<input checked="" type="checkbox"/> NA
LRE-10	300.321(5)	<u>Record Review</u> One school age IEP did not indicate that the IEP Team included a person qualified to interpret the instructional implications of evaluation results. All pre-school IEPs indicated that the IEP Team included a person qualified to interpret the instructional implications of evaluation results.	<u>Individual Correction</u> For the one IEP identified as noncompliant, the district must: <ul style="list-style-type: none"> • Provide documentation that the parent was informed prior to the IEP meeting that the person qualified to interpret the instructional implications of evaluation results would not participate in the meeting, and • Provide a written excuse signed by the parents and the 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. <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.

Component 4: Data Verification

Each school district shall report timely and accurate special education event records for students with disabilities; have in effect an Individualized Education program for each child with a disability with the LEA's jurisdiction and in place on or before Dec. 1, 2009; conduct initial evaluations within 60 days of receiving parental consent for evaluation; have an IEP in place for three-year olds transitioning from Early Intervention Programs on or before the child's third birthday; and have a secondary transition place in place that meets all required elements for IDEA.

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
DV-1	300.645 R.C. 3301.07.14	<u>Record Review</u> All school age and all preschool IEPs indicated that the child had an IEP in effect as reported on the LEA's December 1, 2010 Child Count Report	<u>Individual Correction</u> None <u>Systemic Correction</u> None	<input checked="" type="checkbox"/> NA
DV-2	300.645 R.C. 3301.07.14	<u>Record Review</u> All school age and all preschool ETRs indicated that the child had an ETR in effect as reported on the LEA's December 1, 2010 Child Count Report.	<u>Individual Correction</u> None <u>Systemic Correction</u> None	<input checked="" type="checkbox"/> NA
DV-3	SPP Indicator 20: Accurate and Timely Reporting of Special Education Event Record	<u>Record Review</u> Two school age records had inaccurate student data reported by the LEA through the Education Management Information System (EMIS) for the December 1, 2010 Child County Report, specifically in one or more of the following area(s): a) DOB b) IEP date (IIEP, RIEP, TIEP, CIEP, or FIEP events) c) ETR dates (IETR, RETR, TETR) d) Referral date e) Consent date f) Disability category as indicated as an outcome of ETR g) Admission date h) Withdrawal date i) Non-compliance reason for ETR or IEP date	<u>Individual Correction</u> The district must provide evidence that they corrected the student data through their Student Information System (SIS). <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	
DV-4	SPP Indicator 11 300.301(c)(1)(i)	<u>Record Review</u> All school age and all preschool initial evaluation(s) reported as being conducted within 60 days of the district receiving parental consent for the evaluation were conducted within the required timeline.	<u>Individual Correction</u> None <u>Systemic Correction</u> None	<input checked="" type="checkbox"/> NA
DV-5	SPP Indicator 12 300.124	<u>Record Review</u> All preschool IEPs showed evidence that an IEP was in place for 3 year olds transitioning from Early Intervention Programs (0-3 years) on or before the child's third birthday.	<u>Individual Correction</u> None <u>Systemic Correction</u> None	<input checked="" type="checkbox"/> NA
DV-6 A/B	SPP Indicator 20 for Secondary Transition Plans	<u>Record Review</u> Thirteen school age IEPs did not show evidence that the secondary transition plan reported in EMIS during 2010-2011 was in place that meets all 8 required elements of IDEA for the student, specifically in the following area(s): <ol style="list-style-type: none"> 1. There are appropriate measurable postsecondary goal(s). 2. The postsecondary goals are updated annually. 3. The postsecondary goals were based on age appropriate transition assessment. 4. There are transition services that will reasonably enable the student to meet the postsecondary goal(s). 5. The transition services include courses of study that will reasonably enable the student to meet the postsecondary goal(s). 6. The annual goal(s) are related to the student's transition service needs. 7. There is evidence the student was invited to the IEP Team Meeting where transition services were discussed. 8. When appropriate, there is evidence that a representative of any participating agency was invited to the IEP Team Meeting. 	<u>Individual Correction</u> Thirteen current IEPs did not contain transition plans that meet all 8 required elements of IDEA. The district must reconvene the IEP teams to review and correct the secondary transition plan for the thirteen records identified as still noncompliant or provide documentation of the student's withdrawal date. <u>Systemic Correction</u> The district must submit evidence to OEC of written procedures and practices in place regarding data reporting. OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.	<input checked="" type="checkbox"/> Yes A Corrective Action Plan is required due to meeting the 30% threshold of non-compliance.

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

Component 1: Statement of Accounts

District/School has submitted its FY11 IDEA Part B Regular (fund 516) and Pre-School (fund 587) ARRA FERs in the CCIP. The Financial Detail (FINDET) report and Accounting Report (ACCRPT) for those funds and the Final Expenditure Reports are consistent and in agreement. The District/School has provided copies of their FY12 IDEA Part B FINDET and ACCRPTs for the two funds. The reports show that expenditures for each fund to date are in line with the FY12 budget in the CCIP. 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.

Regulation 34 CFR	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
		Required Actions	
300.202	Bradford Exempted School District provided fiscal reports for the FY11 ARRA and FY12 Part B and Part C program years. The reports were only for items purchased by Bradford and then reimbursed by Darke County ESC, the fiscal agent. Because Bradford is part of a consortium served by Darke County ESC and items specific to Bradford cannot be separated, comparing the Summary Of Account (SOA) to the FINDET and the FER is not possible.	<u>Individual Correction</u> None <u>Systemic Correction</u> None,	<input checked="" type="checkbox"/> No

Component 2: Payroll Expenditures

District/School is able to document that the federal funds were expended for an appropriate purpose; payroll expenditures are supported by Time and Effort Logs 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; districts ACCRPT and FER are in agreement.

Regulation 34 CFR	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
		Required Actions	
300.202	<p>IDEA B and C funds were budgeted and expended for salaries and benefits for 11 staff members employed by the Darke County ESC and serving Bradford. The ESC on behalf of Bradford, maintains copies of appropriate and required licensure. All expenditures are reflected in the Accounting Report. The coding was appropriate.</p> <p>The district made available copies of the 2010-2011 Semi Annual Single Funding Source Certification for each staff person. Time and Effort logs or hourly time sheets were maintained for some summer staff.</p>	<p><u>Individual Correction</u></p> <p>None</p> <p><u>Systemic Correction</u></p> <p>None</p>	<input checked="" type="checkbox"/> No

Component 3: Non-Payroll Expenditures

District/School is able to document that the federal funds were expended 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.

Regulation 34 CFR	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
		Required Actions	
300.202	<p>11 vouchers were provided by Bradford and reviewed for FY11 Fund 516 special cost center 9320. There were no errors noted.</p> <p>2 voucher packets were provided by Bradford reviewed for FY11 Fund 587 special cost center 9320. There were no errors noted.</p> <p>7 vouchers were provided by Darke County ESC and reviewed for FY12 fund 516. No errors were found.</p> <p>15 vouchers were provided by Darke County ESC and were reviewed for fund FY12 587. No errors were found.</p>	<p><u>Individual Correction</u></p> <p>None</p> <p><u>Systemic Correction</u></p> <p>None</p>	<input checked="" type="checkbox"/> No

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

District/school expended 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 Part B purposes only and can be removed from the non-public school without remodeling the school facility.

Regulation 34 CFR	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
		Required Actions	
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"/> No

Component 5: Equipment inventory policy and procedures

The district/school retains control and administration of funds used to purchase materials, equipment and property purchased with those funds for the uses and purpose 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.

Regulation 34 CFR	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
		Required Actions	
300.202	<p>Bradford provided an inventory list of 39 items purchased with ARRA and Part B funds. From this list, 25 items were inspected. Most of the items were located according to the list. Overall the inventory was good and should improve with the new system.</p> <p>Projectors were purchased for many classrooms, some of which were special education classrooms. A number of the projectors were purchased for regular/inclusion classrooms. 20% of the district's students have been identified as students with disabilities. The number of projectors in regular/inclusion classrooms was slightly above 20%.</p>	<u>Individual Correction</u> No corrections required in this section. <u>Systemic Correction</u> No corrections required in this section. Darke ESC and Bradford should ensure that equipment purchased using Part B funding should primarily benefit students with disabilities. The assumption that SWD may attend a regular classroom is not enough to justify the purchase of equipment using Part B funds. When purchasing equipment for all students, the use of Part B funds should correspond to the percentage of SWD.	<input checked="" type="checkbox"/> No

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.

Regulation 34 CFR	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
		Required Actions	
300.130 through 300.144	There are no non-publics located within Bradford.	<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.

Regulation 34 CFR	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
		Required Actions	
300.165 and Part 300.201	<p>Bradford Exempted School District did not hold a public meeting.</p> <p>The district did not publish notice of receipt of funding and a meeting for directed feedback and comments. The district did not hold a meeting to share the spending plan with the public.</p>	<u>Individual Correction</u> None <u>Systemic Correction</u> Bradford Exempted School District must provide evidence of the intent to schedule and announce an opportunity for public participation in the planning for use of IDEA funds. The district must also submit a Corrective Action Plan which includes implementation steps on how it will provide an opportunity for public participation in the planning for the use of IDEA Part B funds.	<input checked="" type="checkbox"/> Yes

Component 8: Redirection of funds

The district/school has redirected funds for CEIS and is able to document the expenditures related to CEIS, validate that the percent of the IDEA funds used for CIES is 15% or less of total allocation, 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/school reduced its local expenditures by no more than ½ of its additional allocation amount and can document the expenditures/reduction and the amount is shown in the CCIP.

Regulation 34 CFR	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
		Required Actions	
300.205	Bradford Exempted School District did not use IDEA funds for CEIS.	<u>Individual Correction</u> None <u>Systemic Correction</u> None	<input checked="" type="checkbox"/> NA

Gifted Education Review

A gifted education review to ensure compliance with state law and state *Operating Standards for Identifying and Serving Gifted Students* was conducted on November 8, 2011 by Rosemary Pearson.

Eight gifted education components were addressed during the onsite review. Each component is detailed below, including a description of evidence provided and reviewed and corrective action required to resolve any issues of non-compliance.

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

Component 1: Gifted Budget

Based on Am. Sub. HB 1, is the district spending for services to identified gifted students at least the same amount of state funding that it received in fiscal year 2009 through unit funding? In addition, did districts that in fiscal year 2009 received gifted student services from an ESC – and the ESC received gifted unit funding in fiscal year 2009 – 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 from the funds received through the EBM an amount not less than the amount of gifted unit funding expended by an ESC in fiscal year 2009 for the district's students?

Regulation 34 CFR	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
		Required Actions	
ORC 3306.09(G)	<p>Evidence was provided to demonstrate that fiscal year 2011 gifted spending was equal to or more than fiscal year 2009 unit funding.</p> <p>Note: The district is writing WEPs for AP students who take classes in their area of identification. This process will be completed by mid-December. The coordinator will provide support to the teachers. The cost of serving these 16 students will complete the amount needed to be compliant with the MOE requirements.</p>	<p><u>Individual Correction</u></p> <p>None</p> <p><u>Systemic Correction</u></p> <p>None</p>	<input checked="" type="checkbox"/> NA

Component 2: 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?

Regulation 34 CFR	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
		Required Actions	
OAC 3301-51-15(D)(4)	WEPs for the four students served were provided and reviewed. All attributes were present on all WEPs.	<u>Individual Correction</u> None <u>Systemic Correction</u> None	<input checked="" type="checkbox"/> NA

Component 3: 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.

Regulation 34 CFR	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
		Required Actions	
ORC 3324.06(D)	The district attests that 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 4: Acceleration and Attestation

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

Regulation 34 CFR	Evidence of Findings	Evidence of Correction		Must be addressed in CAP
		Required Actions		
ORC 3324.10	The district provided an explanation of how they are implementing their board approved acceleration policy.	<u>Individual Correction</u> None	<u>Systemic Correction</u> None	<input checked="" type="checkbox"/> NA

Component 5: 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?

Regulation 34 CFR	Evidence of Findings	Evidence of Correction		Must be addressed in CAP
		Required Actions		
OAC 3301- 51-15(E)(2)	As per the attestation, requirements regarding percentage of time providing direct instruction and having other duties related to gifted education were met.	<u>Individual Correction</u> None	<u>Systemic Correction</u> None	<input checked="" type="checkbox"/> NA

Component 6: Licensure Attestation

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

Regulation 34 CFR	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)	Copies of licenses for the gifted coordinator and the GIS were provided for review. Staff members hold the appropriate licensure or endorsement for the position of gifted coordinator and/or GIS.	<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?

Regulation 34 CFR	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
		Required Actions	
OAC 3301-51-15(E)	The district attested and schedules confirmed that this requirement has been met. However, evidence indicated that students who are not identified as gifted are also in the group served by the GIS.	<u>Individual Correction</u> None <u>Systemic Correction</u> The district must develop a plan that assures that only identified gifted students will be part of the resource room group.	<input checked="" type="checkbox"/> Yes

Component 8: Requirement for Regular Education Teacher Professional Development

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 that curriculum related to gifted services is differentiated?

Regulation 34 CFR	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
		Required Actions	
OAC 3301-51-15(D)(3)(b)(i)	NA	<u>Individual Correction</u> None <u>Systemic Correction</u> None	<input checked="" type="checkbox"/> NA