

**Summit Academy – Akron Middle School District
IRN 132779****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 April 16, 17 and 18, 2012 by the Ohio Department of Education's Office for Exceptional Children (OEC) 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 and Fiscal)

IDEA Review**Overview**

Educational consultants from the Office for Exceptional Children (OEC) conducted IDEA review activities on April 16, 17, and 18, 2012. 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 March 19, 2012, Summit Academy Middle School - Akron mailed 80 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 March 19, 2012 on their website.

On April 16, 2012, OEC consultants held a public meeting for parents and other interested parties. Public parent meeting dates for all districts selected for IDEA Reviews are posted on the ODE website. Four parents and one grandparent attended the public meeting. Written comment forms were available before, during and after the meeting. OEC received no written comments.

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

2. Pre-Onsite Data Analysis

OEC 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 April 17 and 18, 2012, OEC consultants reviewed 31 records of school age students with disabilities. OEC selected records of a variety of children with disabilities.

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

4. Staff/Administrative Interviews

On April 18, 2012, OEC consultants held two sessions of interviews with five administrators and nine teachers, behavior specialist, Title 1 teacher, 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. One member from state support team, region 8 was also in attendance.

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 Summit Academy Middle School - Akron. 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 Karla Spangler, OEC Lead Consultant at esclew_ks@sstr1.org 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: 10-12-2012

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: 11-30-2012

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: 06-11-2013

For questions about specific components of this report please contact:

- **Special Education School Age:** Karla Spangler, OEC Lead Consultant, at 419-, toll-free at (877) 644-6338, or by e-mail at esclew_ks@sstr1.org .
- **Fiscal:** Stephanie Ferrell, Educational Consultant, at 614-752-1249, toll-free at (877) 644-6338, or by e-mail at stephanie.ferrell@education.ohio.gov.

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

Component 1: Child Find

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

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
CF-1	300.303(b)(2)	<p><u>Record Review</u></p> <p>One reevaluation record indicated that the child's reevaluation was not completed within the three year timeline.</p>	<p><u>Individual Correction</u></p> <p>OEC has verified that this student has a current ETR in place, so no additional individual correction is required.</p> <p><u>Systemic Correction</u></p> <p>The district must submit evidence to OEC of written procedures and practices in place regarding child find evaluation process. OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.</p>	<p><input checked="" type="checkbox"/> No</p> <p>The district does <u>not</u> need to address this finding in a Corrective Action Plan.</p>
CF-2	300.305(a)	<p><u>Record Review</u></p> <p>No pre-school served at this community school.</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>
CF-3	OAC 3301-51-06 (2) and OAC 3301-51-06(4)	<p><u>Record Review</u></p> <p>Two school age initial evaluations did not appropriately document interventions provided to resolve concerns for the child performing below grade-level standards.</p> <p><u>Interviews</u></p> <p>Students are grouped daily to provide appropriate interventions.</p>	<p><u>Individual Correction</u></p> <p>OEC has verified that these students have a current IEP in place, so no additional individual correction is required.</p> <p><u>Systemic Correction</u></p> <p>The district must submit evidence to OEC of written procedures and practices in place regarding documentation of intervention and supports provided prior to completion of the initial evaluation team report.</p> <p>OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.</p>	<p><input checked="" type="checkbox"/> Yes</p> <p>A Corrective Action Plan is required due to meeting the 30% threshold of non-compliance.</p>

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)	<u>Record Review</u> All school age records did show evidence that the evaluation planning team included the parent. <u>Interviews</u> There is much discussion with parents prior to and during planning.	<u>Individual Correction</u> None <u>Systemic Correction</u> None	<input checked="" type="checkbox"/> NA	
CF-5	300.305(a)(1)	<u>Record Review</u> All school age evaluations did provide evidence that the evaluation planning team reviewed existing data on the child.	<u>Individual Correction</u> None <u>Systemic Correction</u> None	<input checked="" type="checkbox"/> NA	
CF-6	300.305(a)(2)	<u>Record Review</u> All school age evaluations did provide evidence that the evaluation planning team identified what additional data, if any, were needed.	<u>Individual Correction</u> None <u>Systemic Correction</u> None	<input checked="" type="checkbox"/> NA	
CF-7	300.304(c)(4); OAC 3301-51-01; and OAC 3301-51-06	<u>Record Review</u> All school age evaluations did provide evidence that the evaluation addresses all areas related to the suspected disability.	<u>Individual Correction</u> None <u>Systemic Correction</u> None	<input checked="" type="checkbox"/> NA	
CF-8	300.306(a)(1)	<u>Record Review</u> All school age records did show evidence that the parent of the child was involved in determining whether the child is a child with a disability.	<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-9	300.306(a)(1)	<p><u>Record Review</u></p> <p>One school age initial evaluations did not show evidence that a group of qualified professionals as appropriate to the suspected disability were involved in determining whether the child is a child with a disability.</p> <p><u>Interviews</u></p> <p>The titles have been changed to reflect the correct personnel attending the meetings.</p>	<p><u>Individual Correction</u></p> <p>The district must provide evidence that a group of qualified professionals participated in the eligibility determination. If not, the IEP team must reconvene the ETR meeting and provide OEC evidence of group participation.</p> <p>A group of qualified professionals includes the following, but is not limited to:</p> <ul style="list-style-type: none"> • Parent • Additional group members: <ul style="list-style-type: none"> • The child’s regular education teacher; or a regular classroom teacher qualified to teach a child of his or her age; or • For a preschool child an individual qualified by the SEA to teach a child of his or her age; and • At least one person qualified to conduct individual diagnostic examinations of children. <p><u>Systemic Correction</u></p> <p>The district must submit evidence to OEC of written procedures and practices in place regarding the eligibility determination process.</p> <p>OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.</p>	<p><input checked="" type="checkbox"/> No</p> <p>The district does <u>not</u> need to address this finding in a Corrective Action Plan.</p>

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
CF-10	300.306(a)(1); 300.305(a); and 3301-51-01 (B)(21)	<p><u>Record Review</u></p> <p>Seven school age reevaluations did not show evidence that a group of qualified professionals as appropriate to the suspected disability were involved in determining whether the child is a child with a disability.</p> <p><u>Other Considerations</u></p> <p>IEP coordinator arranges everything; getting paperwork together, scheduling meeting, holding meeting etc.</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>The district must submit evidence to OEC of written procedures and practices in place regarding the eligibility determination 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.

Component 2: Delivery of Services

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

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
DS-1	300.320(a)(1)(i)	<p><u>Record Review</u></p> <p>Three school age IEPs did not address how the child's disability affects his/her involvement and progress in the general education curriculum.</p>	<p><u>Individual Correction</u></p> <p>The district must reconvene the IEP teams of the three IEPs identified as noncompliant to review and amend the IEP to include a statement of how the child's disability affects the child's participation in appropriate activities to access, participate and progress in the general education curriculum.</p> <p><u>Systemic Correction</u></p> <p>The district must submit evidence to OEC of written procedures and practices in place regarding the involvement and progress of children with disabilities in the general education curriculum and assessing how their disability affects that involvement.</p> <p>OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.</p>	<p><input checked="" type="checkbox"/> No</p> <p>The district does <u>not</u> need to address this finding in a Corrective Action Plan.</p>
DS-2	300.320(a)(1)	<p><u>Record Review</u></p> <p>Eleven school age IEPs did not contain Present Levels of Academic Achievement and Functional Performance (PLOP) that addressed the needs of the student.</p>	<p><u>Individual Correction</u></p> <p>The district must reconvene the IEP teams of the 11 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>

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
DS-3	300.320 (a)(2)(i)(A)	<p><u>Record Review</u> Four school age IEPs did not contain annual goals that address the child's academic area(s) of need.</p> <p><u>Interviews</u> Only one person writes the ETR/IEP. Uses information from director and staff prior to writing.</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 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> The district must submit evidence to OEC of written procedures and practices in place regarding the IEP process of addressing identified academic 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-4	300.320(a)(2)(i)(A)	<p><u>Record Review</u> Eleven school age IEPs did not contain annual goals that address the child's functional area(s) of need.</p> <p><u>Interviews</u> During the interview process, it was explained that the use of PBIS is school-wide and classroom-wide. Adaptive behavior skills are taught in small groups.</p>	<p><u>Individual Correction</u> The district must reconvene the IEP teams of the 11 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> The district must submit evidence to OEC of written procedures and practices in place regarding the IEP process of addressing identified functional 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"/> Yes A Corrective Action Plan is required due to meeting the 30% threshold of non-compliance.

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
DS-5	300.320(a)(2)(i)	<p><u>Record Review</u></p> <p>Eleven school age student IEPs did not contain measurable annual goals.</p>	<p><u>Individual Correction</u></p> <p>The district must reconvene the IEP teams of the 11 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>	<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-6	300.320(a)(4)	<p><u>Record Review</u></p> <p>Ten school age 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></p> <p>During the interview process, it was obvious that the staff was using specially designed instruction when working with their students. They will document it in the future.</p>	<p><u>Individual Correction</u></p> <p>The district must reconvene the IEP teams of the ten IEPs identified as noncompliant to review and amend the specially designed instruction to describe the adaption of, as appropriate to the needs of the child, the content, methodology, or delivery of instruction.</p> <p><u>Systemic Correction</u></p> <p>The district must submit evidence to OEC of written procedures and practices in place regarding the IEP process of determining specially designed instruction.</p> <p>OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.</p>	<p><input checked="" type="checkbox"/> Yes</p> <p>A Corrective Action Plan is required due to meeting the 30% threshold of non-compliance.</p>

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
DS-7	300.320(a)(7)	<u>Record Review</u> Two school age IEPs did not indicate the location where the specially designed instruction will be provided.	<u>Individual Correction</u> The district must reconvene the IEP teams of the two IEPs identified as noncompliant to review and amend the location where the specially designed instruction will be provided. <u>Systemic Correction</u> The district must submit evidence to OEC of written procedures and practices in place regarding the IEP process of determining the location where specially designed instruction will occur. OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.	<input checked="" type="checkbox"/> No The district does <u>not</u> need to address this finding in a Corrective Action Plan.
DS-8	300.320(a)(7)	<u>Record Review</u> Twelve school age IEPs did not indicate the amount of time and frequency of the specially designed instruction.	<u>Individual Correction</u> The district must reconvene the IEP teams of the 12 IEPs identified as noncompliant to review and amend the amount of time and frequency of the specially designed instruction. <u>Systemic Correction</u> The district must submit evidence to OEC of written procedures and practices in place regarding the IEP process of determining the amount and frequency of specially designed instruction to be provided. 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.

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)	<u>Record Review</u> Eight school age IEPs did not identify related services that address the needs of the child and support the annual goals.	<u>Individual Correction</u> The district must reconvene the IEP teams of the eight IEPs identified as noncompliant to review and amend the IEP to include related services that were identified as needed in the IEP. <u>Systemic Correction</u> The 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.	<input checked="" type="checkbox"/> Yes A Corrective Action Plan is required due to meeting the 30% threshold of non-compliance.
DS-10	300.320(a)(7)	<u>Record Review</u> All school age IEPs indicated the location where the related services will be provided.	<u>Individual Correction</u> None <u>Systemic Correction</u> None	<input checked="" type="checkbox"/> NA
DS-11	300.320(a)(7)	<u>Record Review</u> All school age IEPs indicated the amount of time and frequency of the related services to be provided.	<u>Individual Correction</u> None <u>Systemic Correction</u> None	<input checked="" type="checkbox"/> NA

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)	<u>Record Review</u> All school age IEPs identified assistive technology to enable the child to be involved in and make progress in the general education curriculum.	<u>Individual Correction</u> None <u>Systemic Correction</u> None	<input checked="" type="checkbox"/> NA
LRE-2	300.320(a)(6)(i)	<u>Record Review</u> All school age IEPs identified accommodations provided to enable the child to be involved in and make progress in the general education curriculum	<u>Individual Correction</u> None <u>Systemic Correction</u> None	<input checked="" type="checkbox"/> NA
LRE-3	300.320(a)(4)	<u>Record Review</u> One school age IEP did not identify modifications to enable the child to be involved in and make progress in the general education curriculum?	<u>Individual Correction</u> The district must reconvene the IEP team of the one IEP 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. <u>Systemic Correction</u> The district must submit evidence to OEC of written procedures and practices in place regarding modifications. 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	
LRE-4	300.320(a)(4)	<u>Record Review</u> All school age IEPs identified supports for school personnel to enable the child to be involved in and make progress in the general education curriculum.	<u>Individual Correction</u> None <u>Systemic Correction</u> None	<input checked="" type="checkbox"/> NA
LRE-5	300.320(a)(5)	<u>Record Review</u> Eight school age IEPs did not include an explanation of the extent to which the child will not participate with nondisabled children in the regular education classroom? <u>Interviews</u> During the interviews, the teachers noted that, even with modifications and accommodations, many students cannot do the classroom work in general education setting.	<u>Individual Correction</u> The district must reconvene the IEP teams of the eight IEPs identified as noncompliant to review and include a justification for why the child was removed from the regular education classroom. The justification should: <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. <u>Systemic Correction</u> The district must submit evidence to OEC of written procedures and practices in place regarding least restrictive environment placement decision process. 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.

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
LRE-6	300.321(1)	<u>Record Review</u> All school age IEPs indicated that the IEP Team included a parent.	<u>Individual Correction</u> None <u>Systemic Correction</u> None	<input checked="" type="checkbox"/> NA
LRE-7	300.321(2)	<u>Record Review</u> Four school age IEPs did not indicate that the IEP Team included a regular education teacher.	<u>Individual Correction</u> For the four IEPs 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 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. <u>Systemic Correction</u> The district must submit evidence to OEC of written procedures and practices in place regarding regular education teacher involvement in the IEP process. 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 not 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	
LRE-8	300.321(3)	<u>Record Review</u> Eleven school age IEPs did not indicate that the IEP Team included a special education teacher.	<u>Individual Correction</u> For the 11 IEPs 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 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. <u>Systemic Correction</u> The district must submit evidence to OEC of written procedures and practices in place regarding special education teacher involvement in the IEP process. 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.
LRE-9	300.321(4)	<u>Record Review</u> All school age IEPs indicated that the IEP Team included an LEA representative.	<u>Individual Correction</u> None <u>Systemic Correction</u> None	<input type="checkbox"/> NA
LRE-10	300.321(5)	<u>Record Review</u> All school age IEPs indicated that the IEP Team included of a person qualified to interpret the instructional implications of evaluation results.	<u>Individual Correction</u> None <u>Systemic Correction</u> None	<input checked="" type="checkbox"/> NA

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 plan 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 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 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> Five school age records had inaccurate student data reported by the LEA through the Education Management Information System (EMIS) for the December 1, 2010 Child Count Report, specifically in 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> 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"/> 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 initial evaluations 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> No preschool served at this community school.	<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> No Transition Plans were reviewed for this district.	<u>Individual Correction</u> None <u>Systemic Correction</u> None	<input checked="" type="checkbox"/> NA

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

Component 1: Statement of Accounts

The district/school has submitted its FY11 FERs for IDEA – ARRA funds and IDEA Pre-School ARRA funds. The Financial Detail (FINDET) Report for those funds and the Final Expenditure Reports are consistent and in agreement. The fiscal reports are evidence that ensure that district children with disabilities have available to them a free appropriate public education (FAPE) that emphasizes special education and related services designed to meet their unique needs.

Findings Citation	Evidence	Evidence of Correction		Must be addressed in CAP
		Required Actions	Date Due	
300.202	<p>The documentation provided by the district for fund 516 special cost center 9320 (ARRA) and the FER matched.</p> <p>The documentation provided by the district for fund 516 FY12 regular is in line with the current budget in the CCIP – there were no deviations.</p>	<p><u>Individual Correction</u> None</p> <p><u>Systemic Correction</u> None</p>		<input checked="" type="checkbox"/> NA

Component 2: Payroll Expenditures

The 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; district's ACCRPTs and FERs are in agreement.

Findings Citation	Evidence	Evidence of Correction		Must be addressed in CAP
		Required Actions	Date Due	
300.202	<p>Fund 516 FY12 regular supports .5 FTE. Licensure for the IEP differentiated specialist is current and appropriate.</p> <p>The fund and object codes applied for the employee's payroll are correct.</p> <p>The function code applied is incorrect. The IEP Differentiated Specialist is currently coded to function 1100, regular instruction. If this position serves students in the classroom the instructional series function 1230, Handicapped Special Learning Experiences for K through Grade-6 and 1240, Handicapped Special Learning Experiences for Grades 7 through 12, would be more appropriate. The school will examine options 1231 through 1239 and 1241 through 1249 to determine the appropriate code to apply.</p> <p>The time spent performing administrative functions unrelated to special education should be coded to a different function code. Therefore, the employee will be coded to three lines of code for payroll purposes. For example the IEP differentiated specialist will be coded to:</p> <ol style="list-style-type: none"> 1. Fund 516, function 1241 (example only), at whatever percentage IDEA pays of the special education job duties. 2. Fund 001, function 1241(example only), at whatever percentage the general fund pays for the special education job duties. 3. Fund 001, function 2490 (example only), at 20% for the other Administrative functions performed with regular education students. <p>A position description was provided for the position supported by fund 516.</p> <p>Please note - Function code errors impact EMIS reporting which may impact the calculation for maintenance of effort.</p>	<p><u>Individual Correction</u></p> <p>The function code for the IEP differentiated specialist should be changed to the appropriate code in the 1230 and 1240 series no matter the funding source for FY12 special education activities and coded to a separate function code to reflect the time spent performing non-special education duties.</p> <p>Time and Effort logs will be utilized when journaling the payroll coding and costs above.</p> <p><u>Systemic Correction</u></p> <p>The sample size for testing is very small, which causes the errors identified in the Evidence of Findings section to be categorized as systemic. As a result, Summit Academy is required to prepare a corrective action plan to address how it will resolve the errors found.</p> <p>I recommend Summit Academies review coding for special education at their other facilities to ensure the proper function codes are being utilized.</p>	<p>Individual Correction for Fiscal Requires the following due date:</p> <p>*30 days from receipt of this report.</p>	<p><input checked="" type="checkbox"/> Yes</p>

Component 3: Non-Payroll Expenditures

The 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.

Findings Citation	Evidence	Evidence of Correction		Must be addressed in CAP
		Required Actions	Date Due	
300.202	<p>Fund 516, ARRA, FY11: 1 of 1 transactions were reviewed. Voucher # 9747 applied function code 1100, regular instruction; the code should have been from function code series 1230 and/or 1240.</p> <p>Fund 516, FY12: 1 of 1 transactions were reviewed. Voucher # 84463 applied function code 1230 and 1240. The school should code at a deeper level within the function code series' to identify the handicap being served. ODE recommends the code with the highest percentage of students attributed to it be used in this case for 1230 and 1240.</p> <p>100% of the expenditures reviewed were appropriate uses of the funds.</p> <p>Summit Academy purchasing guideline #1 states that each purchase requisition must be completely filled out with a detailed description of the item to be purchased, explanation of the reason for the purchase, the vendor, cost and quantity and any other applicable information. The vouchers packets reviewed were lacking detailed descriptions of the items to be purchased and were missing explanations of as to the reason for the purchase. I recommend the academy review the purchasing guidelines with all staff throughout their school system to ensure they are aware of this requirement. If this is implemented it should assist in the proper function coding of all expenditures by the grant staff.</p> <p>Please note - Function code errors impact EMIS reporting which may impact the calculation for maintenance of effort.</p>	<p><u>Individual Correction</u></p> <p>Summit Academy will review the voucher packets identified in the evidence of findings section and will identify more accurate and appropriate function codes to be applied. The function codes applied in FY12 will be corrected in their accounting system. Evidence of correction will be provided to OEC upon completion.</p> <p><u>Systemic Correction</u></p> <p>The sample size for testing is very small, which causes the errors identified in the Evidence of Findings section to be categorized as systemic. As a result, Summit Academy is required to prepare a corrective action plan to address how it will resolve the errors found at the Toledo site.</p> <p>OEC recommends that Summit Academies review coding for special education at their other facilities to ensure the proper function codes are being utilized.</p>	<p>Individual Correction for Fiscal Requires the following due date:</p> <p>*30 days from receipt of this report.</p>	<p><input checked="" type="checkbox"/> Yes</p>

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

If the 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.

Findings Citation	Evidence	Evidence of Correction		Must be addressed in CAP
		Required Actions	Date Due	
300.202	The school had one transaction coded to IDEA ARRA in FY11 – it was for the purchase of 24 paid CPS RF System. The portion paid by ARRA was \$1,189.00. The function code applied to this purchase was incorrect, 1100 regular instruction. The code should have been from the 1230 and/or 1240 function series.	<u>Individual Correction</u> It is too late to change the function code error, as the year has closed and the FER is approved. The function code error does impact EMIS reporting. The school should make a note of this error in case they run into issues with reports generated with EMIS data. <u>Systemic Correction</u> Not applicable		<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.

Findings Citation	Evidence	Evidence of Correction		Must be addressed in CAP
		Required Actions	Date Due	
300.202	An onsite review was not performed for this school given that there were so few items purchased with IDEA funds and since an onsite review was performed for the school's Toledo site.	<u>Individual Correction</u> Not applicable <u>Systemic Correction</u> Not applicable		<input checked="" type="checkbox"/> NA

Component 6: Non-Public Count and Proportionate Share

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

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

Findings Citation	Evidence	Evidence of Correction		Must be addressed in CAP
		Required Actions	Date Due	
300.130 through 300.144	Not Applicable - Summit Academy is a community school. This component does not apply.	<u>Individual Correction</u> None <u>Systemic Correction</u> None		<input checked="" type="checkbox"/> NA

Component 7: Notification of Public Participation

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

Findings Citation	Evidence	Evidence of Correction		Must be addressed in CAP
		Required Actions	Date Due	
300.165 and Part 300.201	The school provided a copy of the notice, meeting presentation and the sign-in sheet.	<u>Individual Correction</u> None <u>Systemic Correction</u> None		<input checked="" type="checkbox"/> NA

Component 8: Redirection of funds

If the district/school has redirected funds for CEIS, it is able to document the expenditures related to CEIS and to validate that the percent of the IDEA funds used for CIES is 15% or less of total allocation, to document the number of students who were served and are able to track and report on the number of students who subsequently received special education services.

If the district/school reduced its local expenditure, it was by no more than 1/2 of its additional allocation amount and the district can document the expenditures/reduction and the amount is shown in the CCIP.

Findings Citation	Evidence	Evidence of Correction		Must be addressed in CAP
		Required Actions	Date Due	
300.205	Summit Academy Akron Middle School did not redirect IDEA funding for Comprehensive Early Intervening Service (CEIS).	<u>Individual Correction</u> None <u>Systemic Correction</u> None		<input checked="" type="checkbox"/> NA