

**Southside Academy of Youngstown Community School
012105 IRN****Ohio Department of Education, Office for Exceptional Children
2012-2013 Onsite Review Summary Report****Introduction**

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

The following report is a summary of the onsite review conducted on May 7, 8, and 9, 2013 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 May 7, 8, and 9, 2013. During the IDEA Review, OEC consultants monitor the LEA's implementation of IDEA to ensure compliance. The primary focus of the IDEA Review is to:

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

OEC focused the desk review portion on the following areas:

- Child Find;
- Delivery of Services;
- Least Restrictive Environment;
- Data Verification; and
- Discipline

Data Sources

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

1. Public Parent and, Individual Parent Written Comments

On April 23, 2013, Southside Academy Youngstown Community School District mailed 62 OEC approved letters to all families with students with disabilities in the district. OEC provided the district with information to send written information, and telephone numbers for public/parent input through an announcement for inclusion on its website or newsletter. The district posted the information regarding the meeting date on the school website.

On May 7, 2013, 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 or family members attended the meeting. One State Support Team (SST) Region 5 representative attended the public meeting. OEC received no written comments or telephone calls.

2. Pre-Onsite Data Analysis

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

3. Record Review

On May 7 and 8, 2013, OEC consultants reviewed 38 records of school age students with disabilities.. OEC selected records of a variety of children with disabilities from one building.

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

4. Staff/Administrative Interviews

On May 8 and 9, 2013, OEC consultants held three sessions of interviews with two administrators and ten 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; and Discipline.

Findings

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

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

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

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

Corrective Action Plan (CAP)

The *Review of Findings and District Required Actions* identifies the noncompliance which must be addressed in the corrective action plan developed by the Southside Academy of Youngstown Community 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 Olivia Schmidt, OEC Lead Consultant at Olivia.schmidt@education.ohio.gov within 30 school days from the date of this report. OEC will review the action plan submitted by the district for approval. If OEC deems that a revision(s) is necessary, the district will be required to revise and resubmit. The district will be contacted by the OEC Lead Consultant and notified when the action plan has been approved.

CAP Due Date: September 24, 2013

Individual Correction

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

Individual Correction Due Date: November 6, 2013

Systemic Correction

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

Systemic Correction Due Date: June 23, 2014

For questions about specific components of this report please contact:

- **Special Education School Age:** Olivia Schmidt, OEC Lead Consultant, at (614) 752-1397, toll-free at (877) 644-6338, or by e-mail at olivia.schmidt@education.ohio.gov.
- **Fiscal:** Naim Sanders, Educational Consultant, at (614) 644-6083, toll-free at (877) 644-6338, or by e-mail at naim.sanders@education.ohio.gov.

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

Component 1: Child Find

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

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
CF-1	300.303(b)(2)	<p><u>Record Review</u></p> <p>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>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>This district does not serve, nor enroll preschool students.</p>	<p><u>Individual Correction</u></p> <p>None</p> <p><u>Systemic Correction</u></p> <p>None</p>	<p><input checked="" type="checkbox"/> NA</p>

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
CF-3	OAC 3301-51-06 (2) and OAC 3301-51-06(4)	<p><u>Record Review</u></p> <p>Five 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>It was discussed during the interviews that the Rtl process is working, but the understanding of "how" to complete the documentation of interventions is an area for improvement.</p>	<p><u>Individual Correction</u></p> <p>OEC has verified that these five 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>	<input checked="" type="checkbox"/> Yes A Corrective Action Plan is required due to meeting the 30% threshold of non-compliance.
CF-4	300.501(b)(1)	<p><u>Record Review</u></p> <p>Eleven (11) school age student records did not show evidence that the evaluation planning team included the parent.</p>	<p><u>Individual Correction</u></p> <p>The district must provide evidence that the parent was involved or provided the opportunity to participate (three documented attempts) in the evaluation planning process.</p> <p>The evidence may include; evaluation planning form, prior written notice, parent invitation, referral form or communication log.</p> <p>If the district cannot provide documentation that the parent was involved or provided the opportunity to participate in the evaluation planning process, the district must conduct evaluation planning with the parent.</p> <p><u>Systemic Correction</u></p> <p>The district must submit evidence to OEC of written procedures and practices in place regarding the evaluation planning process to include the parent.</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.

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
CF-5	300.305(a)(1)	<p><u>Record Review</u> Six school age student evaluations did not provide evidence that the evaluation planning team reviewed existing data on the child.</p> <p><u>Interviews</u> This is associated with the lack of understanding about how to complete the form.</p> <p><u>Other Considerations</u> This is an area that will greatly benefit from professional development.</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.
CF-6	300.305(a)(2)	<p><u>Record Review</u> Seven school age student evaluations did not provide evidence that the evaluation planning team identified what additional data, if any, were needed.</p> <p><u>Interviews</u> This is associated with the lack of understanding about how to complete the form.</p> <p><u>Other Considerations</u> This is an area that will benefit from professional development.</p>	<p><u>Individual Correction</u> The district must provide the evaluation planning form or evidence documenting additional data, if any was reviewed during the evaluation planning process. If not, the IEP team must reconvene the ETR planning and ETR meeting.</p> <p><u>Systemic Correction</u> 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-7	300.304(c)(4); OAC 3301-51-01; and OAC 3301-51-06	<p><u>Record Review</u> Thirteen (13) school age student evaluations did not provide evidence that the evaluation addresses all areas related to the suspected disability.</p> <p><u>Interviews</u> Several planning forms were either left blank or “unknown” was written in the area where the suspected disability should have been written, thus making it unclear as to what disability the district was testing for. Therefore it was not clear if the ETR covered all the required areas related to the suspected disability. The staff stated that the previous Psychologist was the only person who completed the form and handled ETR meetings. Administration and the Management Company personnel stated that the new Psychologist was much more thorough and team oriented.</p> <p><u>Other Considerations</u> This is an area that will benefit greatly from professional development.</p>	<p><u>Individual Correction</u> The district will convene the 13 ETR teams to conduct a reevaluation and provide evidence that the evaluation addresses all areas related to the suspected disability.</p> <p><u>Systemic Correction</u> The district must submit evidence to OEC of written procedures and practices in place to provide evidence that the evaluation addresses all areas related to the suspected disability.</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.	
CF-8	300.306(a)(1)	<p><u>Record Review</u> Six school age student records did not show evidence that the parent of the child was involved in determining whether the child is a child with a disability.</p>	<p><u>Individual Correction</u> 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> 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-9	300.306(a)(1)	<p><u>Record Review</u></p> <p>One school age student initial evaluation did not show evidence that a group of qualified professionals as appropriate to the suspected disability were involved in determining whether the child is a child with a disability.</p>	<p><u>Individual Correction</u></p> <p>The district must provide evidence that a group of qualified professionals participated in the eligibility determination. If not, the IEP team must reconvene the ETR meeting and provide OEC evidence of group participation.</p> <p>A group of qualified professionals includes the following, but is not limited to:</p> <ul style="list-style-type: none"> • Parent • Additional group members: <ul style="list-style-type: none"> • The child's regular education teacher; or a regular classroom teacher qualified to teach a child of his or her age; or • For a preschool child an individual qualified by the SEA to teach a child of his or her age; and • At least one person qualified to conduct individual diagnostic examinations of children. <p><u>Systemic Correction</u></p> <p>OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.</p>	<p><input checked="" type="checkbox"/> No</p> <p>The district does <u>not</u> need to address this finding in a Corrective Action Plan.</p>

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
CF-10	300.306(a)(1); 300.305(a); and 3301-51-01 (B)(21)	<u>Record Review</u> One school age reevaluation 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.	<u>Individual Correction</u> 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. IEP Team Members include, but are not limited to: <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. <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 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>Seven school age student IEPs did not address how the child's disability affects his/her involvement and progress in the general education curriculum.</p>	<p><u>Individual Correction</u></p> <p>The district must reconvene the IEP teams of the seven IEPs identified as noncompliant to review and amend the IEP to include a statement of how the child's disability affects the child's participation in appropriate activities to access, participate and progress in the general education curriculum.</p> <p><u>Systemic Correction</u></p> <p>OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.</p>	<p><input checked="" type="checkbox"/> No</p> <p>The district does <u>not</u> need to address this finding in a Corrective Action Plan.</p>
DS-2	300.320(a)(1)	<p><u>Record Review</u></p> <p>Thirteen (13) school age student IEPs did not contain Present Levels of Academic Achievement and Functional Performance (PLOP) that addressed the needs of the student.</p> <p><u>Other Considerations</u></p> <p>Often the Present Levels contained too much irrelevant information that did not relate to a specific annual goal need for the student. There is a clear need for comprehensive professional development from the Region 5 State Support Team.</p>	<p><u>Individual Correction</u></p> <p>The district must reconvene the IEP teams of the 13 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></p> <p>Two school age student IEPs did not contain annual goals that address the child's academic area(s) of need.</p>	<p><u>Individual Correction</u></p> <p>The 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>	<input checked="" type="checkbox"/> No <p>The district does <u>not</u> need to address this finding in a Corrective Action Plan.</p>
DS-4	300.320(a)(2)(i)(A)	<p><u>Record Review</u></p> <p>Ten school age student IEPs did not contain annual goals that address the child's functional area(s) of need.</p> <p><u>Interviews</u></p> <p>Staff members did not understand the need to include a functional goal when an adaptive behavior concern is expressed. Additional training in the area of the 13 disability categories is an area of need.</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 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>

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>Twelve (12) school age student IEPs did not contain measurable annual goals.</p> <p><u>Other Considerations</u></p> <p>There is a clear need for comprehensive professional development from the Region 5 State Support Team.</p>	<p><u>Individual Correction</u></p> <p>The district must reconvene the IEP teams of the 12 IEPs identified as noncompliant to review and amend annual goals to contain the following six critical elements:</p> <ol style="list-style-type: none"> 1. Who? 2. Will Do What? 3. To What Level or Degree? 4. Under What Conditions? 5. In What Length of Time? 6. How Will Progress Be Measured? <p><u>Systemic Correction</u></p> <p>The district must implement new procedures to ensure that annual goals written subsequent to this report will include the following six critical elements to demonstrate correction:</p> <ol style="list-style-type: none"> 1. Who? 2. Will Do What? 3. To What Level or Degree? 4. Under What Conditions? 5. In What Length of Time? 6. How Will Progress Be Measured? <p>OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.</p>	<p><input checked="" type="checkbox"/> Yes</p> <p>A Corrective Action Plan is required due to meeting the 30% threshold of non-compliance.</p>

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
DS-6	300.320(a)(4)	<p><u>Record Review</u> Thirteen (13) school age student IEPs did not contain a statement of specially designed instruction that addresses the needs of the child and supports annual goals.</p> <p><u>Other Considerations</u> There is a clear need for comprehensive professional development from the Region 5 State Support Team.</p>	<p><u>Individual Correction</u> The district must reconvene the IEP teams of the 13 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> Thirteen (13) school age student IEPs did not indicate the location where the specially designed instruction will be provided.</p> <p><u>Other Considerations</u> There is a clear need for comprehensive professional development from the Region 5 State Support Team.</p>	<p><u>Individual Correction</u> The district must reconvene the IEP teams of the 13 IEPs identified as noncompliant to review and amend the location where the specially designed instruction will be provided.</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 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.</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-8	300.320(a)(7)	<p><u>Record Review</u> Thirteen (13) school age student IEPs did not indicate the amount of time and frequency of the specially designed instruction.</p> <p><u>Other Considerations</u> There is a clear need for comprehensive professional development from the Region 5 State Support Team.</p>	<p><u>Individual Correction</u> The district must reconvene the IEP teams of the 13 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> 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.</p>	<input checked="" type="checkbox"/> Yes A Corrective Action Plan is required due to meeting the 30% threshold of non-compliance.
DS-9	300.320(a)(4)	<p><u>Record Review</u> Thirteen (13) school age student IEPs did not identify related services that address the needs of the child and support the annual goals.</p> <p><u>Other Considerations</u> There is a clear need for comprehensive professional development from the Region 5 State Support Team.</p>	<p><u>Individual Correction</u> The district must reconvene the IEP teams of the 13 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"/> 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-10	300.320(a)(7)	<p><u>Record Review</u></p> <p>Twelve (12) school age student IEPs did not indicate the location where the related services will be provided.</p> <p><u>Other Considerations</u></p> <p>There is a clear need for comprehensive professional development from the Region 5 State Support Team.</p>	<p><u>Individual Correction</u></p> <p>The district must reconvene the IEP teams of the 12 IEPs identified as noncompliant to review and amend the IEPs to include the location where the related services will be provided.</p> <p><u>Systemic Correction</u></p> <p>The district must submit evidence to OEC of written procedures and practices in place regarding the IEP process of determining the location where related services will occur.</p> <p>OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.</p>	<p><input checked="" type="checkbox"/> Yes</p> <p>A Corrective Action Plan is required due to meeting the 30% threshold of non-compliance.</p>
DS-11	300.320(a)(7)	<p><u>Record Review</u></p> <p>Five school age student IEPs did not indicate the amount of time and frequency of the related services to be provided.</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 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>One school age student IEP 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></p> <p>The district must reconvene the IEP team of the one IEP identified as noncompliant to review assistive technology and/or services that would directly assist the child with a disability to increase, maintain, or improve their functional capabilities and include them on the IEP.</p> <p><u>Systemic Correction</u></p> <p>The district must submit evidence to OEC of written procedures and practices in place regarding assistive technology.</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>
LRE-2	300.320(a)(6)(i)	<p><u>Record Review</u></p> <p>Six school age student IEPs did not identify accommodations provided to enable the child to be involved in and make progress in the general education curriculum.</p>	<p><u>Individual Correction</u></p> <p>The district must reconvene the IEP teams of the six IEPs identified as noncompliant to review the accommodations that would directly assist the child to access the course content without altering the amount or complexity of the information taught and include them on the IEP.</p> <p><u>Systemic Correction</u></p> <p>OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.</p>	<p><input checked="" type="checkbox"/> No</p> <p>The district does <u>not</u> need to address this finding in a Corrective Action Plan.</p>

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
LRE-3	300.320(a)(4)	<p><u>Record Review</u></p> <p>Thirteen (13) school age student IEPs did not identify modifications to enable the child to be involved in and make progress in the general education curriculum.</p>	<p><u>Individual Correction</u></p> <p>The district must reconvene the IEP teams of the 13 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>	<p><input checked="" type="checkbox"/> Yes</p> <p>A Corrective Action Plan is required due to meeting the 30% threshold of non-compliance.</p>
LRE-4	300.320(a)(4)	<p><u>Record Review</u></p> <p>Three school age student IEPs did not identify supports for school personnel to enable the child to be involved in and make progress in the general education curriculum.</p>	<p><u>Individual Correction</u></p> <p>The district must reconvene the IEP teams of the three IEPs identified as noncompliant to review the supports for school personnel that were identified by the IEP team and define on the IEP the support, who will provide it and when the support will take place.</p> <p><u>Systemic Correction</u></p> <p>The district must submit evidence to OEC of written procedures and practices in place regarding supports for school personnel.</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	
LRE-5	300.320(a)(5)	<p><u>Record Review</u></p> <p>Thirteen (13) school age student IEPs did not include an explanation of the extent to which the child will not participate with nondisabled children in the regular education classroom.</p>	<p><u>Individual Correction</u></p> <p>The district must reconvene the IEP teams of the 13 IEPs identified as noncompliant to review and include a justification for why the child was removed from the regular education classroom.</p> <p>The justification should:</p> <ul style="list-style-type: none"> • Be based on the needs of the child, not the disability. • Reflect that the team has given adequate consideration to meeting the student's needs in the regular classroom with supplementary aids and services. • Document that the nature or severity of the disability is such that education in regular education classes, even with the use of supplementary aids and services, cannot be achieved satisfactorily. • Describe potential harmful effects to the child or others, if applicable. <p><u>Systemic Correction</u></p> <p>The district must submit evidence to OEC of written procedures and practices in place regarding the least restrictive environment placement decision process.</p> <p>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	
LRE-6	300.321(1)	<u>Record Review</u> Three school age student IEPs did not indicate that the IEP Teams included a parent.	<u>Individual Correction</u> For the three IEPs identified as noncompliant, the district must: <ul style="list-style-type: none"> • Provide evidence of parent participation at the IEP meeting, or • Provide documentation of at least three attempts made by the district to ensure parent participation, or • Reconvene the IEP team to review the IEP with the parent. <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.
LRE-7	300.321(2)	<u>Record Review</u> One school age student IEP did not indicate that the IEP Team included a regular education teacher.	<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 regular education teacher would not participate in the meeting, and • Provide a written excuse signed by the parents and the district that allowed the regular education teacher not to be in attendance at the IEP meeting, or • Reconvene the IEP team to review the IEP with all required members present. <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	
LRE-8	300.321(3)	<u>Record Review</u> Two school age student IEPs did not indicate that the IEP Team included a special education teacher.	<u>Individual Correction</u> For the two 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> 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.
LRE-9	300.321(4)	<u>Record Review</u> One school age student IEP did not indicate that the IEP Team included an LEA representative.	<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 LEA representative would not participate in the meeting, and • Provide a written excuse signed by the parents and the district that allowed the LEA representative not to be in attendance at the IEP meeting, or • Reconvene the IEP team to review the IEP will all required members present. <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	
LRE-10	300.321(5)	<p><u>Record Review</u></p> <p>Two school age student IEPs did not indicate that the IEP Team included a person qualified to interpret the instructional implications of evaluation results.</p>	<p><u>Individual Correction</u></p> <p>For the two IEPs identified as noncompliant, the district must:</p> <ul style="list-style-type: none"> • Provide documentation that the parent was informed prior to the IEP meeting that the person qualified to interpret the instructional implications of evaluation results would not participate in the meeting, and • Provide a written excuse signed by the parents and the district that allowed the person qualified to interpret the instructional implications of evaluation results not to be in attendance at the IEP meeting, or • Reconvene the IEP team to review the IEP will all required members present. <p><u>Systemic Correction</u></p> <p>OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.</p>	<p><input checked="" type="checkbox"/> No</p> <p>The district does <u>not</u> need to address this finding in a Corrective Action Plan.</p>

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, 2011; 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 student IEPs indicated that the child did have an IEP in effect as reported on the LEA's December 1, 2011 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 student ETRs indicated that the child did have an ETR in effect as reported on the LEA's December 1, 2011 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> All school age student records had accurate student data reported by the LEA through the Education Management Information System (EMIS) specifically in the following areas: 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> 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	
DV-4	SPP Indicator 11 300.301(c)(1)(i)	<u>Record Review</u> All school age student initial evaluation(s) reported as being conducted within 60 days of the district receiving parental consent for the evaluation was 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> This district does not serve nor enroll preschool students.	<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> This district did not have any transition age students at the time of this review.	<u>Individual Correction</u> None <u>Systemic Correction</u> None	<input checked="" type="checkbox"/> NA

Component 5: Discipline

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

Note: One student record was reviewed for the area of discipline.

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
DIS-1	300.530(e)(1)	<u>Record Review</u> One student record showed evidence that the district conducted a manifestation determination.	<u>Individual Correction</u> None <u>Systemic Correction</u> None	<input checked="" type="checkbox"/> NA
DIS-2	300.530(e)(1)	<u>Record Review</u> One student record indicated that the manifestation determination was conducted within 10 school days of the district's decision to change the placement of a child with a disability.	<u>Individual Correction</u> None <u>Systemic Correction</u> None	<input checked="" type="checkbox"/> NA
DIS-3	300.530(e)(1)	<u>Record Review</u> One student record showed evidence that, as part of the manifestation determination review, the team reviewed relevant information included in the student's file and the student's IEP.	<u>Individual Correction</u> None <u>Systemic Correction</u> None	<input checked="" type="checkbox"/> NA
DIS-4	300.530(e)(1)	<u>Record Review</u> One student record showed evidence that, as part of the manifestation determination review, the IEP team reviewed relevant information presented by the parents and teacher observations.	<u>Individual Correction</u> None <u>Systemic Correction</u> None	<input checked="" type="checkbox"/> NA
DIS-5	300.530(e)(1)(i) and (2)	<u>Record Review</u> One student record showed evidence that, as part of the manifestation determination review, the IEP team determined whether or not the conduct in question was caused by/or had a direct and substantial relationship to the child's disability.	<u>Individual Correction</u> None <u>Systemic Correction</u> None	<input checked="" type="checkbox"/> NA

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
DIS-6	300.530(e)(1)(i) and (2)	<u>Record Review</u> One student record showed evidence that, as part of the manifestation determination review, the IEP team determined whether or not the child's conduct was a direct result of the district's failure to implement the IEP.	<u>Individual Correction</u> None <u>Systemic Correction</u> None	<input checked="" type="checkbox"/> NA
DIS-7	300.530(e)(1)	<u>Record Review</u> One student record indicated that the IEP team determined whether or not the child's conduct was a manifestation of the child's disability in accordance with the results of the manifestation determination review.	<u>Individual Correction</u> None <u>Systemic Correction</u> None	<input checked="" type="checkbox"/> NA
DIS-8	300.530 (f) (1) (i)-(ii)	<u>Record Review</u> One student record showed evidence that the district initiated a functional behavioral assessment (FBA) after the manifestation determination.	<u>Individual Correction</u> None <u>Systemic Correction</u> None	<input checked="" type="checkbox"/> NA
DIS-9	300.530 (f) (1) (i)-(ii)	<u>Record Review</u> One student record indicated that the district implemented a behavioral intervention plan (BIP) for the child as a result of the FBA.	<u>Individual Correction</u> None <u>Systemic Correction</u> None	<input checked="" type="checkbox"/> NA

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

Component 1: Statement of Accounts

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

Findings Citation	Evidence	Evidence of Correction		Must be addressed in CAP
		Required Actions	Date Due	
300.202	<p>Southside Academy provided ODE with a FINDET report detailing their expenditures. In the CCIP Southside Academy budgeted and expended \$135,045.68 in Object Code 400. Southside Academy does not have any early childhood programs during this time.</p> <p>In the CCIP, \$135,045.68 was allocated for fund 516. No funds were budgeted for CEIS redirection.</p> <p>To date funds were spent in Object Codes 400.</p>	<p><u>Individual Correction</u> None</p> <p><u>Systemic Correction</u> None</p>	N/A	<input checked="" type="checkbox"/> NA

Component 2: Payroll Expenditures

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

Findings Citation	Evidence	Evidence of Correction		Must be addressed in CAP
		Required Actions	Date Due	
300.202	<p>Southside Community School pays for four certified teachers out of IDEA Part B in addition to also paying for two Instructional Aides. All teachers have appropriate and current certifications.</p>	<p><u>Individual Correction</u> None</p> <p><u>Systemic Correction</u> None</p>		<p>No</p> <p><input checked="" type="checkbox"/> NA</p>

Component 3: Non-Payroll Expenditures

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

Findings Citation	Evidence	Evidence of Correction		Must be addressed in CAP
		Required Actions	Date Due	
300.202	There were no non-payroll expenditures for Southside Academy.	<u>Individual Correction</u> None <u>Systemic Correction</u> None		<input checked="" type="checkbox"/> NA

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

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

Findings Citation	Evidence	Evidence of Correction		Must be addressed in CAP
		Required Actions	Date Due	
300.202	No funds were spent on capital outlay for Southside Academy	<u>Individual Correction</u> None <u>Systemic Correction</u> None		<input checked="" type="checkbox"/> NA

Component 5: Equipment inventory policy and procedures

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

Findings Citation	Evidence	Evidence of Correction		Must be addressed in CAP
		Required Actions	Date Due	
300.202	This is not applicable at Southside Academy.	<u>Individual Correction</u> None <u>Systemic Correction</u> None		<input checked="" type="checkbox"/> NA

Component 6: Non-Public Count and Proportionate Share

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

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

Findings Citation	Evidence	Evidence of Correction		Must be addressed in CAP
		Required Actions	Date Due	
300.130 through 300.144	This is not applicable at Southside Academy.	<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	Southside Academy held a meeting in September of 2012 for the general public to discuss IDEA funds. At this meeting, there was not a sign-in sheet for parents. Another meeting is scheduled for May 2013.	<u>Individual Correction</u> The district will conduct its public participation meeting for IDEA funds in May and submit a copy of the sign-in sheet and agenda by the end of June. <u>Systemic Correction</u> None	June 30, 2013	<input checked="" type="checkbox"/> No

Component 8: Redirection of funds

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

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

Findings Citation	Evidence	Evidence of Correction		Must be addressed in CAP
		Required Actions	Date Due	
300.205	The district did not choose to use funds for Comprehensive Early Intervening Service and redirected 15% of the IDEA funds.	<u>Individual Correction</u> None <u>Systemic Correction</u> None		<input checked="" type="checkbox"/> NA