

**Coshocton County Career Center
IRN: 065235****Ohio Department of Education and Workforce
Office for Exceptional Children
2025-2026 IDEA Monitoring Review Summary Report****Introduction**

The Ohio Department of Education and Workforce, Office for Exceptional Children, would like to extend appreciation to the Coshocton County Career Center staff for their efforts, attention, and time committed to the completion of the review process.

Definition of terms in this document:

Individual Corrections or Record Corrections refers to the correction of Individualized Education Programs (IEPs), Evaluation Team Reports (ETRs), and other special education records that were reviewed by the Department and found to be noncompliant.

Systemic Corrections refers to noncompliance within the larger systems at work to implement IDEA within the educational agency. This includes but is not limited to Systemic Correction of records and special education procedures and practices to document ongoing compliance with IDEA requirements.

Overview

The following report is a summary of the onsite review conducted by the Department on November 4-7, 2025, as part of its general supervision requirements under the Individuals with Disabilities Education Act (IDEA).

During the onsite review, the Department monitors the educational agency's implementation of IDEA to ensure compliance and positive results for students with disabilities. The primary focus of the review is to:

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

Onsite reviews are targeted to include the following specific areas:

- Child Find;
- Delivery of Services;
- Least Restrictive Environment;
- IEP Verification of Delivery of Services;
- Parent Input; and
- Teacher, Special Education Service Provider, and Administrator Interviews.

Data Sources

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

1. Parent Input

Coshocton County Career Center mailed 90 letters of the Department's notification of review to all families with students with disabilities in the educational agency. The educational agency posted the notification of review on its website which included a link to a recorded presentation from the Department providing an overview of the monitoring review process. The presentation also provides contact information and requests parents to provide comments to the Department regarding the special education program in their career center. The notification of review was also posted on the Department's website.

The Department did not receive any comments.

2. Pre-Onsite Data Analysis

The Department conducted a comprehensive review which included building and grade level data; Special Education Profile; Ohio School Report Cards; Comprehensive Continuous Improvement Plan (CCIP) and/or OnePlan; and Education Management Information System (EMIS) data. The data analysis assisted the Department in determining potential growth areas for improvement and educational agency strengths.

3. Record Review/IEP Verification

Prior to the onsite visit, the Department staff reviewed 15 records of school-age students with disabilities. The Department staff selected records of students with disabilities from a variety of disability categories and ages. Twelve (12) of these student records were also selected for IEP verifications in a classroom setting.

Across verifications, Department staff noted high levels of engagement among students observed. As is often noted when visiting career technical education programs, students were observed to be independently motivated in much of their coursework and remained on task throughout different classroom environments. Instructional staff were observed providing redirection and support during whole-group instruction, as well as more individualized support through small group and one-on-one instruction. Staff all appeared to be aware of student accommodation needs when asked during classroom visits, and instructional staff repeatedly noted their willingness to do whatever was necessary to ensure students were successful in their programs.

In addition to the IEP verifications that were held, the review team was able to attend the Career Partnership Day on November 6th, which highlighted the work of the students in all career technical education (CTE) programs. On this day, administration from every associate educational agency was invited to observe lab classes, where students demonstrated what they have learned as part of their industry credential coursework. This showcase not only allowed students to celebrate their hard work within their CTE program but also maintain positive relationships with staff from their home school. The review team observed students who had a strong depth of content knowledge that reflected high levels of engagement with the coursework.

4. Staff/Administrative Interviews

On November 4th and 5th, the Department consultants held nine sessions of interviews with six administrators and 25 general education teachers, lab instructors, intervention specialists, school counselors, paraprofessionals, and school psychologists from the associate educational agencies. Interviews focused on the following review areas: Child Find; Delivery of Services; Least Restrictive Environment (LRE) and IEP alignment and Discipline.

Strengths/Commendations:

Throughout interview sessions, it was consistently affirmed that staff have built a culture of high expectations and personal responsibility among the student body while still providing differentiated instruction to support a range of student needs. Multiple staff members noted that as long as students are putting in consistent and sincere effort, they are willing to provide any accommodations or supports needed to help them succeed. The staff of Coshocton County Career Center take an assets-first approach when working with students on determining their career pathways. Staff members, from leadership to the instructional level, showed a desire for continued growth. Staff were actively engaged throughout the review process, taking the onsite visit as an opportunity to learn and improve. Various interview groups expressed interest in additional training to support their work with students.

Findings of Noncompliance/Required Actions

A finding is made when noncompliance is identified by the Department with IDEA and Ohio Operating Standards requirements. Findings are also made when noncompliance is identified in relation to the evaluation team report (ETR) and/or individualized education program (IEP) requirements. For a noncompliance level of 30% or greater in any single area or for identified areas of concern that did not reach 30% or greater, a Corrective Action Plan (CAP) will be developed to address those areas. All noncompliance identified by the Department as part of the review (listed by subject area in the *Department's Review Findings and Educational Agency Required Actions Table*) must be corrected as indicated in the *Evidence of Correction/Recommendations* column.

Refer to the details of requirements in the [Evidence of Findings and Evidence of Correction/Recommendations table below](#), and the attached [Individual Record Review Comment Sheets for specific individual record corrections](#).

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

Corrective Action Plan (CAP)

The educational agency will develop a CAP to address any items identified in this summary report. An approved form for the CAP will be provided by the Department or can be accessed on the Department's website by using the keyword search "Monitoring." The CAP developed by the educational agency with SST assistance must include the following:

- Activities to address all areas identified in this summary report;
- Documentation/evidence of implementation of the activities;
- Individuals responsible for implementing the activities;
- Resources needed;
- Completion dates; and
- Continued Plan for Improvement and/or Compliance.

The educational agency must submit the CAP by email to catherine.lewis@education.ohio.gov within 30 school days from the date of this report. The Department will review the CAP submitted by the educational agency for approval. If the Department determines that a revision(s) is necessary, the educational agency will be required to revise and resubmit. The educational agency will be contacted by the Department and notified when the action plan has been approved.

CAP Due Date: March 19, 2026

Department Trainings

As part of the Department monitoring process, Coshocton County Career Center personnel, as identified by the Department, are required to complete the OEC Special Education Process Learning Management System (LMS) training modules within **30 school days** from the date of this report. The Department, supported by State Support Team (SST) 12, provided an in-person training that met the LMS module requirements on September 26th, 2025.

LMS Training Modules Completion Date: September 26, 2025.

Individual Correction

The educational agency has **60 school days** from the date of this report to correct all identified findings of noncompliance for individual students whose records were selected and reviewed by the Department during the onsite review unless noted otherwise in the report. Detailed information on individual findings is provided in a separate report.

Individual Correction Due Date: May 5, 2026

CAP Activities and Systemic Correction

The educational agency will provide the Department with documentation verifying the educational agency's completion of all CAP activities and all systemic corrections noted in this summary report. The Department will verify systemic correction through the review of this documentation and a review of additional student records.

Completion of CAP Activities and Systemic Correction Due Date: December 4th, 2026

Once the educational agency has completed all action plan activities, the educational agency will plan for continuous improvement through the One Plan with Department and SST assistance.

For questions regarding the review, please contact: Catie Lewis, the Department's IDEA Monitoring Contact, at 614-980-2577, toll-free at (877) 644-6338, or by e-mail at Catherine.Lewis@education.ohio.gov.

The Department's Review Findings and Educational Agency Required Actions

Component 1: Child Find

Each educational agency shall adopt and implement written policies and procedures approved by the Ohio Department of Education and Workforce, Office for Exceptional Children, that ensure all children with disabilities residing within the educational agency, 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 Ohio Operating Standards serving Children with Disabilities.

Record Review Item	Evidence of Findings	Evidence of Corrections/Recommendations	Must be Addressed in CAP
CF-1	<p><u>OAC 3301-51-06 [Evaluations]</u></p> <p>Eight out of 12, or 67% of evaluations reviewed did not appropriately document interventions provided to resolve concerns for the child performing below grade-level standards.</p> <p><u>Interviews</u></p> <p>In interview sessions, it was noted that there is not frequently a need to provide new interventions to students at the career center that fall outside the scope of their current IEP services. Staff and parents tend to notice that students appear more driven and focused once placed into one of their preferred career pathways, which often results in stronger performance, especially in functional areas such as behavior.</p> <p><u>Concerns Noted</u></p> <p>The Part 2 Summary of Interventions section often listed a detailed student evaluation history as well as the services that are being provided through the student's current IEP, not a summary of new interventions that were provided outside of the current IEP. When documenting the data for interventions provided, ensure this section includes the following required components:</p> <ol style="list-style-type: none"> 1. A description of the research-based intervention(s) used; 2. How long the intervention was provided (how many weeks); 3. The intensity of the intervention – how often, and for how many minutes; 4. A description of the results compared to the baseline data; and 	<p><u>Individual Correction</u></p> <p>The Department has verified that these students have a current ETR in place, so no additional individual correction is required.</p> <p><u>Systemic Correction</u></p> <p>The Department will verify 100% compliance in this area through a review of new records that were written after the completion of the September 26th Internal Monitoring and Universal Supports trainings.</p> <p><u>Opportunities for Improvement</u></p> <p>As part of the IDEA Comprehensive Review Summary Report and corrective action plan, the Coshocton County Career Center will review and revise the communication plan with leadership from the three associate educational agencies.</p> <p>The team is recommended to develop a procedure of checks and balances within the communication plan to ensure interventions that are being provided to students are correctly documented within the ETR as well as in the Part 2 Summary of Interventions.</p> <p>It is recommended that the associate educational agencies review their procedures and practices regarding documentation of interventions and supports provided prior to completion of the initial and reevaluation team report.</p>	<p><input checked="" type="checkbox"/> Yes</p> <p>This finding needs to be addressed in a Corrective Action Plan.</p>

Record Review Item	Evidence of Findings	Evidence of Corrections/Recommendations	Must be Addressed in CAP
	<p>5. The decision as a result of the intervention(s).</p> <p>6. For reevaluations, if no additional interventions were provided, simply noting that the team agreed the current IEP supports and services are suitable to meet the student's needs will suffice.</p> <p>All internal monitoring teams across all educational agencies, which include the school psychologists from each agency, have already participated in the Internal Monitoring Training as delivered by the Office for Exceptional Children. This training clarified the requirements for the Intervention Summary section of the Part 2. If additional clarification or training is needed, the involved educational agencies can continue to receive support through the Supports and Monitoring Team and consultants from SST 12.</p>		
CF-2	<p>34 CFR 300.501(b) [Parent participation in meetings] and OAC 3301-51-06 (E)(2)(a) [Evaluation procedures].</p> <p>One out of 12, or 8% of student records reviewed did not show evidence that the parent was afforded the opportunity to participate in the evaluation team planning process.</p> <p><u>Interviews</u></p> <p>During the planning process for an upcoming reevaluation, the school psychologists from the associate educational agencies communicate potential needs for new testing with the intervention specialists at the career center as well as discuss this, either over the phone or in person, with the parent. In addition, the educational agency includes the parents when determining if waiving a reevaluation is appropriate. While the decision is ultimately left up to the student's parent or guardian, the team considers if the student is planning to continue with more education or head straight into the workforce. If the student plans on the latter, and additional evaluations may not benefit their trajectory, the ETR team will bring up the choice to waive a reevaluation with the student and their family. Similarly, if the student's career pathway has not changed and their current</p>	<p><u>Individual Correction</u></p> <p>The educational agency must provide evidence that the parent was involved or provided the opportunity to participate in the evaluation planning process.</p> <p>The evidence may include evaluation planning form, prior written notice, parent invitation, referral form, or communication log.</p> <p><u>Systemic Correction</u></p> <p>The Department will verify 100% compliance in this area through a review of new records that were written after the completion of the September 26th Internal Monitoring and Universal Supports trainings.</p> <p><u>Opportunities for Improvement</u></p> <p>The staff involved in considering the waiving of a reevaluation are encouraged to discuss this option with the intervention specialists and other instructors at the career center to ensure that the current eligibility criteria for the</p>	<p><input checked="" type="checkbox"/> No</p> <p>This finding does <u>not</u> need to be addressed in a Corrective Action Plan.</p>

Record Review Item	Evidence of Findings	Evidence of Corrections/Recommendations	Must be Addressed in CAP
	<p>services are meeting all educational and functional needs, a waiver may also be considered. The associate educational agencies use a checklist to determine when a full reevaluation is necessary or if a waiving of the ETR may be appropriate.</p> <p><u>Concerns Noted</u></p> <p>On the one record found noncompliant in this area, the Planning Form was not signed by the parent, and there was no record of attempts to involve the parent in the planning process, such as a PR-01 or OP-9.</p>	<p>selected disability category still most appropriately match the needs of the students.</p> <p>It is recommended that the associate educational agencies review and revise their written procedures and practices that include the parent in the evaluation planning process.</p>	
CF-3	<p><u>34 CFR 300.300 [Parental Consent]</u></p> <p>Two out of 12, or 17% of student records reviewed did not provide evidence of parental consent obtained prior to evaluation.</p> <p><u>Interviews</u></p> <p>Overall, staff noted positive and proactive relationships with parents throughout the ETR and IEP process.</p> <p><u>Concerns Noted</u></p> <p>For the two records found noncompliant in this area, a PR-05 consent for testing was signed by the parent, but additional testing not identified on the Planning Form was performed after the signing of consent. This testing was marked as either Not Applicable or Sufficient Data Available on the Planning Form, but new testing was then conducted.</p>	<p><u>Individual Correction</u></p> <p>The educational agency must provide evidence that the parent was provided informed, written consent for evaluation, based upon the planning form. Or the agency must show documented repeated attempts to obtain informed, written consent to which the parent did not respond.</p> <p>The evidence may include prior written notice, parent invitation, communication log, or other documented attempts to obtain parental informed, written consent.</p> <p>If the educational agency cannot provide documentation that the parent provided informed, written consent for evaluation, or did not respond to repeated attempts to obtain consent, the agency must conduct a reevaluation including documentation of parental consent.</p> <p><u>Systemic Correction</u></p> <p>The Department will verify 100% compliance in this area through a review of new records that were written after the completion of the September 26th Internal Monitoring and Universal Supports trainings.</p> <p><u>Opportunities for Improvement</u></p> <p>It is recommended that the associate educational agencies review and revise their written procedures and practices for obtaining informed parental consent.</p>	<p><input checked="" type="checkbox"/> No</p> <p>This finding does <u>not</u> need to be addressed in a Corrective Action Plan.</p>

Record Review Item	Evidence of Findings	Evidence of Corrections/Recommendations	Must be Addressed in CAP
CF-4	<p>34 CFR 300.304(c)(4) [Other evaluation procedures] OAC 3301-51-01 [Applicability of requirements and definitions] and 3301-51-06 (E)(2)(a) [Evaluation procedures]</p> <p>Twelve (12) out of 12, or 100% of evaluations reviewed did not provide evidence that the evaluation addresses all areas related to the suspected disability.</p> <p><u>Interviews</u></p> <p>The school psychologists noted that they often rely on staff at the career center, mainly the intervention specialists, to assist in determining if any assessment areas require new testing. Common factors in determining if additional testing is needed include students' current progress on academic goals, if there are new concerns by staff or the parents, or if the staff at the career center notice that new accommodations are supporting academic achievement. The school psychologists noted that staff from the career center consistently complete Part 1s for the reevaluation process in a timely fashion.</p> <p><u>Concerns Noted</u></p> <p>Common reasons for noncompliance in this area included:</p> <ul style="list-style-type: none"> • Assessment areas were included on the Planning Form but not found within a Part 1. It was noted on several ETRs that information was included within the Part 2 Summary of Assessments, however the assessment information was not included in a corresponding Part 1. • Discrepancies between who was listed as Person Responsible on the Planning Form and what staff member actually completed the Part 1. • No date of testing was provided for evaluation areas that were marked as "Additional Testing Needed" on the Planning Form. 	<p><u>Individual Correction</u></p> <p>The educational agency will convene the 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></p> <p>The Department will verify 100% compliance in this area through a review of new records that were written after the completion of the September 26th Internal Monitoring and Universal Supports trainings.</p> <p><u>Opportunities for Improvement</u></p> <p>Improvements in CF-4 can be tracked by the newly-established Internal Monitoring Team (IMT). It is recommended that the IMT focuses on this area when reviewing records and provides support to staff members when this area is found to be noncompliant during record reviews.</p> <p>It is recommended that Coshocton County Career Center, along with its three associate educational agencies, develop a procedure of checks and balances within their communication plan that will ensure all assessments indicated on the Planning Form as either sufficient data available or additional testing/data needed have a completed Part 1.</p> <p>It is recommended that the associate educational agencies review their written procedures and practices to provide evidence that the evaluation addresses all areas related to the suspected disability.</p>	<p><input checked="" type="checkbox"/> Yes</p> <p>This finding needs to be addressed in a Corrective Action Plan.</p>

Record Review Item	Evidence of Findings	Evidence of Corrections/Recommendations	Must be Addressed in CAP
CF-5	<p>34 CFR 300.306(c) [Procedures for determining eligibility and educational need]</p> <p>Eight out of 12, or 67% of evaluations reviewed did not show evidence of clearly stating the summary of assessment results.</p> <p><u>Interviews</u></p> <p>Because there are three associate educational agencies, there are slight variations to internal practices when determining how the Part 2 summary of assessments will be completed. At least one of the schools noted that their practice is to have all team members complete their own summaries for the Part 2, which are then reviewed by the school psychologist to ensure all assessments have been included. At another educational agency, the school psychologist writes the Part 2 summaries for all Part 1s.</p> <p><u>Concerns Noted</u></p> <p>In the records noted for noncompliance in this area, the two concerns observed were:</p> <ul style="list-style-type: none"> • Part 2 Summaries that were missing a summary of specific Part 1s, or • The overall Part 2 Summary was too vague and did not include enough specific information from the corresponding Part 1s to create an actionable IEP. 	<p><u>Individual Correction</u></p> <p>The educational agency will reconvene the ETR teams to conduct a reevaluation and provide a clear and concise summary of the data and assessment conducted that meets the requirements of 3301-51-06 (G) (Summary of information). The IEP team must consider the results of this reevaluation.</p> <p><u>Systemic Correction</u></p> <p>The Department will verify 100% compliance in this area through a review of new records that were written after the completion of the September 26th Internal Monitoring and Universal Supports trainings.</p> <p><u>Opportunities for Improvement</u></p> <p>The newly established Internal Monitoring Teams at each associate educational agency will be beneficial in ensuring the Part 2 of the ETR fully captures all necessary information from the respective Part 1s. This team can also provide feedback to ensure the Part 2 is written in language easily understandable to the parent.</p> <p>It is recommended that Coshocton County Career Center, along with its three associate educational agencies, develop a procedure of checks and balances within their communication plan that will ensure:</p> <ul style="list-style-type: none"> • Assessments identified on the planning form are being completed and represented in Part 1 and are summarized within Part 2 in language that is understandable to the parent. • Active team participation from the staff at the career center whenever a reevaluation or initial evaluation is to be completed after a student is enrolled at the career center. <p>It is recommended that the associate educational agencies review their written procedures and practices regarding the summary of data and assessment results.</p>	<p><input checked="" type="checkbox"/> Yes</p> <p>This finding needs to be addressed in a Corrective Action Plan.</p>

Record Review Item	Evidence of Findings	Evidence of Corrections/Recommendations	Must be Addressed in CAP
CF-6	<p>34 CFR 300.306(c) [Procedures for determining eligibility and educational need]</p> <p>Two out of 12, or 17% of evaluation team reports reviewed did not contain a clear and succinct description of educational needs.</p> <p><u>Interviews</u></p> <p>Interviewed staff noted that what was shared in the Internal Monitoring Training on September 26, 2025, provided clarity on the distinction between the Educational Needs and Implications for Instruction sections of the ETR.</p> <p>Staff at the Career Center frequently write their own Part 1s for the reevaluation process, especially the school’s intervention specialists. Staff noted the desire to receive additional training on how to write a strong Part 1.</p> <p><u>Concerns Noted</u></p> <p>Sometimes educational needs were stated in a Part 1 but were not included in the Part 2 summary. A common pattern noted among reviewed records was a conflation between educational needs and implications for instructions, which often led to some educational needs' sections listing information that would be more appropriate under implications for instruction.</p> <p>Please note this distinction going forward when documenting the educational needs and implications for instruction within the ETR:</p> <ul style="list-style-type: none"> • Information within the Educational Needs box should contain relevant and accurate descriptions of the student’s skill deficits that need to improve to assist the student in progressing in the general curriculum. • The Implications for Instruction section should include suggested instructional practices that will assist the student based on their needs (such as interventions, accommodations, services, and other supports). 	<p><u>Individual Correction</u></p> <p>The educational agency will reconvene the ETR teams to conduct a reevaluation and provide a clear and succinct description of the student’s educational needs. The IEP team must consider the results of this reevaluation.</p> <p><u>Systemic Correction</u></p> <p>The Department will verify 100% compliance in this area through a review of new records that were written after the completion of the September 26th Internal Monitoring and Universal Supports trainings.</p> <p><u>Opportunities for Improvement</u></p> <p>The Internal Monitoring Teams from each associate educational agency will be an asset when checking drafted ETRs for the comprehensive transferring of Educational Needs from individual Part 1s to the Part 2.</p> <p>It is recommended that the associate educational agency review and revise its written procedures and practices regarding the description of educational needs.</p>	<p><input checked="" type="checkbox"/> No</p> <p>This finding does <u>not</u> need to be addressed in a Corrective Action Plan.</p>

Record Review Item	Evidence of Findings	Evidence of Corrections/Recommendations	Must be Addressed in CAP
CF-7	<p>34 CFR 300.306(a)(1) [Determination of eligibility] OAC 3301-51-01 (B)(21) [Applicability of requirements and definitions]</p> <p>Five out of 12, or 42% of evaluations reviewed 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 as well as the child's educational needs.</p> <p><u>Interviews</u></p> <p>Interviewed staff noted a desire to have more involvement from instructional staff, including lab instructors, in the IEP process. Given their knowledge of student performance and educational/functional needs in the lab/career setting, their involvement may provide beneficial insight into the ETR process as well.</p> <p><u>Concerns Noted</u></p> <p>While one record was noncompliant in this area due to a missing signature from the parent, the more common cause for noncompliance in this area was due to a required team member not being present. Most frequently, the missing team member was the general education teacher. Please note the following team requirements for the ETR process:</p> <p>Initial Evaluations:</p> <ol style="list-style-type: none"> 1. Parent 2. A group of qualified professionals that includes: <ul style="list-style-type: none"> • The child's general education teacher; • Person qualified to conduct individual assessments and interpret the results of those assessments such as a School Psychologist; and • Educational agency representative. 3. Additional group members for determining a specific learning disability (SLD) would include: 	<p><u>Individual Correction</u></p> <p>The educational agency must provide evidence that the ETR teams and other qualified professionals, as appropriate, participated in the determination of eligibility and educational needs. If not, the ETR team must reconvene and provide the Department evidence of group participation.</p> <p><u>Systemic Correction</u></p> <p>The Department will verify 100% compliance in this area through a review of new records that were written after the completion of the September 26th Internal Monitoring and Universal Supports trainings.</p> <p><u>Opportunities for Improvement</u></p> <p>By determining the general education staff that are most familiar with the student's academic and functional performance, their involvement in the ETR process may benefit the team's understanding of the strengths and needs of the student.</p> <p>It is recommended that Coshocton County Career Center, along with its associate educational agencies, develop a procedure of checks and balances within their communication plan that will ensure required staff participation in all ETR meetings.</p> <p>It is recommended that the associate educational agencies review their written procedures and practices regarding the eligibility determination process to include all required team members.</p>	<p><input checked="" type="checkbox"/> Yes</p> <p>This finding needs to be addressed in a Corrective Action Plan.</p>

Record Review Item	Evidence of Findings	Evidence of Corrections/Recommendations	Must be Addressed in CAP
	<ul style="list-style-type: none"> • The child’s general education teacher; or • If the child does not have a general education teacher, a general education classroom teacher qualified to teach a child of his or her age; or • For a child of less than school age, an individual qualified by the State Educational Agency (SEA) to teach a child of his or her age; and • At least one person qualified to conduct individual diagnostic examinations of children, such as a school psychologist, speech-language pathologist or remedial reading teacher. <p>4. When appropriate, the child.</p> <p>Reevaluations:</p> <ol style="list-style-type: none"> 1. Parent 2. General education teacher of the child 3. Special education teacher of the child 4. Educational agency representative 5. An individual who can interpret the instructional implications of evaluation results 6. At the discretion of the parent or the school educational agency, 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 		

Record Review Item	Evidence of Findings	Evidence of Corrections/Recommendations	Must be Addressed in CAP
CF-8	<p>OAC 3301-51-01 (B)(10) [Definitions] and 3301-51-06 [Evaluations]</p> <p>Six out of 12, or 50% of evaluations reviewed did not provide a justification for the eligibility determination decision.</p> <p><u>Interviews</u></p> <p>No relevant concerns were noted from the conducted interview sessions.</p> <p><u>Concerns Noted</u></p> <p>The instances of noncompliance in this section were due to:</p> <ul style="list-style-type: none"> • The Eligibility Statement did not include an individualized explanation as to why the selected disability category best met the needs of the student based on the current evaluation information. • The Eligibility Statement was missing an explanation of how the disability affects the individual student’s ability to make progress in the general education curriculum. 	<p><u>Individual Correction</u></p> <p>The educational agency will reconvene the ETR teams to conduct a reevaluation and provide a clear justification for the eligibility determination.</p> <p><u>Systemic Correction</u></p> <p>The Department will verify 100% compliance in this area through a review of new records that were written after the completion of the September 26th Internal Monitoring and Universal Supports trainings.</p> <p><u>Opportunities for Improvement</u></p> <p>The Internal Monitoring Team will have the opportunity to review eligibility determination statements on drafted ETRs to determine if additional information is needed.</p> <p>It is recommended that the associate educational agencies review their written procedures and practices regarding the eligibility determination decision.</p> <p>It is recommended that Coshocton County Career Center, along with its three associate educational agencies, develop a procedure of checks and balances within their communication plan that will ensure all ETRs contain an eligibility determination statement that includes:</p> <ul style="list-style-type: none"> • How the student meets or does not meet the eligibility criteria of all suspected disability categories listed on the planning form • How the disability affects the child's progress in the general education curriculum. 	<p><input checked="" type="checkbox"/> Yes</p> <p>This finding needs to be addressed in a Corrective Action Plan.</p>

Component 2: Delivery of Services

Each educational agency 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	Evidence of Findings	Evidence of Correction/Recommendations	Must be Addressed in CAP
<p>DS-1</p>	<p>SPP Indicator 13 34 CFR 300.320(b) [Transition services] OAC 3301-51-07 (H)(2) [Definition of individualized education program]</p> <p>Twelve (12) out of 15, or 80% of IEPs reviewed did not show evidence that the postsecondary transition plan met all eight required elements of the IDEA for the student:</p> <ol style="list-style-type: none"> 1. There are appropriate measurable postsecondary goal(s). 2. The post-secondary goals are updated annually. 3. The postsecondary goals were based on age-appropriate transition assessment (AATA). 4. There are transition services that will reasonably enable the student to meet the postsecondary goal(s). 5. The transition services include courses of study that will reasonably enable the student to meet the postsecondary goal(s). 6. The annual goal(s) are related to the student's transition service needs. 7. There is evidence that the student was invited to the IEP Team Meeting where transition services were discussed. 8. When appropriate, there is evidence that a representative of any participating agency was invited to the IEP Team Meeting. <p><u>Interviews</u></p> <p>Intervention Specialists at the Career Center include feedback from the general education teachers and lab instructors in the creation of new IEPs. Both the Career Center and the associate educational agencies utilize interest inventory surveys when creating individualized student Age-Appropriate Transition Assessments (AATAs).</p>	<p><u>Individual Correction</u></p> <p>The educational agency must reconvene the teams to review and correct the postsecondary transition plan for the IEPs identified as noncompliant.</p> <p><u>Systemic Correction</u></p> <p>The educational agency must submit evidence to the Department of written procedures and practices regarding transition services. The Department will verify 100% compliance in this area through a review of new records that were written after the completion of the September 26th Internal Monitoring and Universal Supports trainings.</p> <p><u>Opportunities for Improvement</u></p> <p>When reviewing the workload of intervention specialists who co-teach across core academic and lab courses, consider what team members in addition to intervention specialists can provide transition services as outlined within the Transition Plan. Alternatively, consider if transition services as delivered by the intervention specialist can be done within the lab setting to provide increased individualized support for students during these class periods.</p> <p>It is recommended that Coshocton County Career Center along with its three associate educational agencies develop a procedure of checks and balances within their communication plan to ensure all 8 questions on the Indicator 13 Checklist are answered, meeting the unique needs of each student.</p> <p>The newly established Internal Monitoring Team at the Career Center, as well as those of the associate educational agencies, will be utilized to increase systemic compliance across Transition Plans.</p>	<p><input checked="" type="checkbox"/> Yes</p> <p>This finding needs to be addressed in a Corrective Action Plan.</p>

Record Review Item	Evidence of Findings	Evidence of Correction/Recommendations	Must be Addressed in CAP
	<p>Lab instructors expressed a desire to incorporate more coteaching within the lab setting. Staff noted that they see a great potential benefit in students receiving support from their intervention specialists within the lab setting more frequently than is currently scheduled. Lab instructors noted that students do not appear to receive many opportunities prior to enrolling in their CTE program to frontload math and literacy content that is industry-specific; they see a strong benefit in students having access to core academic content that aligns with industry needs.</p> <p>The majority of transition services as outlined within the Transition Plan of the IEP are delivered by the intervention specialists. The lab instructor that leads the Career Skills Inventory (CSI) class does provide postsecondary transition services through the nature of the curriculum of the program, but these services are different from what is included within the IEP Transition Plan.</p> <p><u>Concerns Noted</u></p> <p>Of the eight required elements listed above, the most common reasons for noncompliance on transition plans included criteria one through five. Specifically, common trends noted included:</p> <ul style="list-style-type: none"> • Goals were written in ways that were not measurable, such as with phrases such as “[student] plans to...” • Goals were not updated annually. While a goal may remain the same from the previous IEP, the transition services must be updated unless there is a documented reason for repeating services. Transition Plans with the same goal from the prior IEP were only marked noncompliant if the services were not updated. • Transition services focused on what the student will do, not what the educational agency staff will do/provide. • The Course of Study section did not list either the Ohio Learning Standards or Ohio Learning Standards Extended. 		

Record Review Item	Evidence of Findings	Evidence of Correction/Recommendations	Must be Addressed in CAP
	<p>The Age-Appropriate Transition Assessment Summary was missing one or multiple PINS (preferences, interests, needs, and strengths)</p> <p>Please note going forward for compliance: if relevant PINS information was included in the Profile or most recent ETR, include these within the new AATA to ensure all PINS are represented with information relevant to each section of the Transition Plan (Education and Training, Competitive Integrate Employment, and Independent Living).</p>		
DS-2	<p>34 CFR 300.320(a)(1) [Definition of individualized education program]</p> <p>Fifteen (15) out of 15, or 100% IEPs reviewed did not contain Present Levels of Academic Achievement and Functional Performance (PLOP) that addressed the needs of the student.</p> <p><u>Interviews</u></p> <p>When collecting baseline data for the creation of measurable annual goals, intervention specialists at the career center pull from a range of sources for data collection, including student performance on standardized assessments, work samples collected during small group instruction, and work samples and input as provided by the general education teachers. Given that a majority of the intervention specialists co-teach, they often already have access to current student performance data for many of the classes taken by students on their individual caseloads. When this overlap does not occur, general education teachers will send work samples and relevant data directly to the intervention specialists.</p> <p><u>Concerns Noted</u></p> <p>Noncompliance in this area was due to at least one goal area missing one or both of the following criteria for the Present Levels of Performance section:</p> <ul style="list-style-type: none"> • Clear baseline data that directly reflects the measurement established in the corresponding goal. • A comparison statement that connected to grade-level standards or age-appropriate performance levels. 	<p><u>Individual Correction</u></p> <p>The educational agency must reconvene the IEP teams of the IEPs identified as noncompliant to review and amend the PLOP related to each goal to include the following information as it relates to each goal:</p> <ul style="list-style-type: none"> • Summary of current daily academic/behavior and/or functional performance compared to expected <u>grade-level</u> standards or to expected age-appropriate performance in order to provide a frame of reference for annual goal development in the specific area of academic and/or functional need; • Baseline data provided for developing a measurable goal (for example, ETR results, if current, formative academic assessments, curriculum-based measurements, transition assessments or functional behavior assessments); • Current performance measurement <u>directly</u> relates to the goal measurement. <p><u>Systemic Correction</u></p> <p>The educational agency must submit evidence to the Department of written procedures and practices regarding the review of current academic/functional data when writing IEPs. The Department will verify 100% compliance in this area through a review of new records that were written after the completion of the September 26th Internal Monitoring and Universal Supports trainings.</p>	<p><input checked="" type="checkbox"/> Yes</p> <p>This finding needs to be addressed in a Corrective Action Plan.</p>

Record Review Item	Evidence of Findings	Evidence of Correction/Recommendations	Must be Addressed in CAP
	<p>Several of the reviewed IEPs, a comparison statement was included, but it reflected a comparison to standardized test scores, not the expected performance of a same-age peer that reflected grade-level content standards.</p> <p>Going forward for compliance, include a comparison statement that reflects the expected knowledge and skills as based on the Ohio Learning Standards, which will help to ensure that the comparison to same-age peers is written in a way that is understandable to the parent.</p>	<p><u>Opportunities for Improvement</u></p> <p>The Internal Monitoring Team will be able to assist in verifying compliant Present Level of Performance Summaries that include a standards-based comparison statement as well as baseline data that is in full alignment with the annual goal.</p> <p>It is recommended that the Coshocton County Career Center along with its three associate educational agencies develop a procedure of checks and balances within their communication plan to ensure the Present Levels of Performance sections of all IEPs include:</p> <ul style="list-style-type: none"> • Current baseline data that is in alignment with the measurable annual goal and • A grade level or age-appropriate comparison statement that reflects the Ohio Learning Standards. 	
DS-3	<p>34 CFR 300.320(a)(2)(i) [Definition of individualized education program]</p> <p>Seven out of 15, or 47% IEPs reviewed did not contain measurable annual goals.</p> <p><u>Interviews</u></p> <p>Interviewed staff noted that certain students who have completed all academic content and are now only focused on completing industry credential coursework no longer have a need for all academic goals as written within their IEPs. The Career Center has taken the approach of amending applicable goals to reflect skills that are in alignment with the industry-focused content of the student's labs. This allows students to receive continued individualized instruction that will support progress within their career pathway.</p> <p><u>Concerns Noted</u></p> <p>While not determined as a reason for noncompliance, several records included goals that combined the defined behavior and condition (as described under Individual Correction). Going forward, to ensure clarity for the IEP team, separate these two components when writing the goal statement. This will also assist the Internal Monitoring Team in the efficient review of IEPs for compliance.</p>	<p><u>Individual Correction</u></p> <p>The educational agency must reconvene the teams of the IEPs identified as noncompliant to review and amend annual goals to contain the following critical elements:</p> <ol style="list-style-type: none"> 1. Clearly <u>defined behavior</u>: the specific action the child will be expected to perform. 2. The <u>condition</u> (situation, setting or given material) under which the behavior is to be performed. 3. <u>Performance criteria</u> desired: the level the child must demonstrate for mastery and the number of times the child must demonstrate the skill or behavior. <p><u>Systemic Correction</u></p> <p>The educational agency must submit evidence to the Department of written procedures and practices regarding the development of measurable annual IEP goals. The Department will verify 100% compliance in this area through a review of new records that were written after the completion of the September 26th Internal Monitoring and Universal Supports trainings.</p>	<p><input checked="" type="checkbox"/> Yes</p> <p>This finding needs to be addressed in a Corrective Action Plan.</p>

Record Review Item	Evidence of Findings	Evidence of Correction/Recommendations	Must be Addressed in CAP
		<p><u>Opportunities for Improvement</u></p> <p>The Internal Monitoring Team will be able to assist in verifying compliant measurable annual goals and will ensure systemic compliance by identifying areas within the ETR and IEP that may benefit from ongoing training based on trend patterns as noted by reviewed records.</p> <p>It is recommended that Coshocton County Career Center along with its three associate educational agencies develop a procedure of checks and balances within their communication plan to ensure all measurable annual goals include the three required components as delineated above.</p>	
DS-4	<p>34 CFR 300.320(a)(2)(i) [Definition of individualized education program]</p> <p>Two out of 15 or 13% IEPs reviewed did not contain annual goals that address the child’s academic area(s) of need.</p> <p><u>Concerns Noted</u></p> <p>The two identified records were noncompliant due to educational needs identified in the most recent ETR not being addressed within the current IEP as either a goal, service, or accommodation. If academic needs were addressed in the ETR as being an area of concern, they must be addressed in the IEP in some capacity. It can either be addressed as a goal, a related service, an accommodation or modification, or a statement that indicates the team has prioritized other needs or found that it is not an area of concern at this time.</p>	<p><u>Individual Correction</u></p> <p>The educational agency must reconvene the teams of the IEPs identified as noncompliant to review and amend the IEP. Annual goals must address the academic needs of the child unless the team provides evidence that the goals were prioritized based on the severity of the needs of the child.</p> <p><u>Systemic Correction</u></p> <p>It is recommended that the educational agency review and revise its written procedures and practices regarding the IEP process of addressing identified academic needs. The Department will verify 100% compliance in this area through a review of new records that were written after the completion of the September 26th Internal Monitoring and Universal Supports trainings.</p> <p><u>Opportunities for Improvement</u></p> <p>As part of the Internal Monitoring process, team members will review this area to ensure all educational needs are addressed within the IEP.</p>	<p><input checked="" type="checkbox"/> No</p> <p>This finding does <u>not</u> need to be addressed in a Corrective Action Plan.</p>
DS-5	<p>34 CFR 300.320(a)(2)(i) [Definition of individualized education]</p> <p>All applicable IEPs reviewed contain annual goals that address the child’s functional area(s) of need.</p>	<p><u>Individual Correction</u></p> <p>N/A</p> <p><u>Systemic Correction</u></p> <p>N/A</p>	<p><input checked="" type="checkbox"/> NA</p>

Record Review Item	Evidence of Findings	Evidence of Correction/Recommendations	Must be Addressed in CAP
DS-6	<p>34 CFR 300.320(a)(4) [Definition of individualized education program] OAC 3301-51-07 (H)(1)(e)(i) [Definition of IEP]</p> <p>Ten (10) out of 15, or 67% of IEPs reviewed did not contain a statement of specially designed instruction (SDI) including related services that addresses the individual needs of the child and supports the annual goals.</p> <p><u>Interviews</u></p> <p>Staff interviews consistently reflected the desire and willingness to engage in ongoing professional development to improve instructional practices at the Career Center. Intervention Specialists expressed interest in receiving additional training in the area of specially designed instruction to include both the writing of strong SDI statements as well as ongoing training in effective instructional practices when delivering SDI.</p> <p><u>Concerns Noted</u></p> <p>Common reasons noted for noncompliance in this area include:</p> <ul style="list-style-type: none"> • Multiple providers were listed under Provider Title (only the intervention specialists or related service provider responsible for the delivery can be listed in this section) • The same SDI statement was used to encompass multiple goals (each annual goal must have a specific and individualized SDI statement) • One of the three required criteria were missing: a description of the delivery (one-on-one, small group, etc.), content (what materials and skills will be focused on in connection to the goal), or methodology (instructional practices individualized to the student's needs) 	<p><u>Individual Correction</u></p> <p>The educational agency must reconvene the teams of the IEPs identified as noncompliant to review and amend the specially designed instruction, as appropriate, to address the needs of the child.</p> <p><u>Systemic Correction</u></p> <p>The educational agency must submit evidence to the Department of written procedures and practices regarding the IEP process of determining specially designed instruction. The Department will verify 100% compliance in this area through a review of new records that were written after the completion of the September 26th Internal Monitoring and Universal Supports trainings.</p> <p><u>Opportunities for Improvement</u></p> <p>With the development and continued implementation of the universal tracking system for SDI, the educational agency will ensure that students are receiving all the time and frequency stated within section 7 of their IEP.</p> <p>It is recommended that Coshocton County Career Center along with its three associate educational agencies develop a procedure of checks and balances within their communication plan to ensure that all SDI and related service statements:</p> <ul style="list-style-type: none"> • Describe the nature of the instruction that aligns with the needs of the child • Supports achievement of annual goals and are specific to the individual student needs • Have the appropriate provider listed as the person responsible for the provision of specially designed instruction (intervention specialist or related service provider) • Provide the general education teacher with the support, guidance, and time if they are supporting the intervention specialist with SDIs. 	<p><input checked="" type="checkbox"/> Yes</p> <p>This finding needs to be addressed in a Corrective Action Plan.</p>

Record Review Item	Evidence of Findings	Evidence of Correction/Recommendations	Must be Addressed in CAP
DS-7	<p>34 CFR 300.320(a)(7) [Definition of individualized education program] OAC 3301-51-07 (H)(1)(i) [Definition of IEP]</p> <p>Three out of 15, or 20% IEPs reviewed did not indicate the specific location where the specially designed instruction will be provided.</p> <p>Interviews</p> <p>Intervention Specialists at the Career Center are flexible, providing SDI in the setting that best meets the needs of the student. It was noted that the IEP will be amended if it is determined that a location change will result in better performance by the student. The intervention specialists who co-teach often deliver SDI within their co-taught classroom when the content aligns with the student's goal area.</p> <p>Concerns Noted</p> <p>Two of the reviewed noncompliant records were missing a description of the SDI location, and one record included two locations within one SDI description (each SDI statement must only include one location; this ensures clarity for the parent regarding the time and frequency of SDI delivery in each location).</p>	<p>Individual Correction</p> <p>The educational agency must reconvene the teams of the IEPs identified as noncompliant to review and amend the location where the specially designed instruction will be provided.</p> <p>Systemic Correction</p> <p>It is recommended that the educational agency review and revise its written procedures and practices regarding the IEP process of determining the location where specially designed instruction will occur. The Department will verify 100% compliance in this area through a review of new records that were written after the completion of the September 26th Internal Monitoring and Universal Supports trainings.</p>	<p><input checked="" type="checkbox"/> No</p> <p>This finding does <u>not</u> need to be addressed in a Corrective Action Plan.</p>
DS-8	<p>34 CFR 300.320(a)(7) [Definition of individualized education program] OAC 3301-51-07 (H)(1)(i) [Definition of IEP]</p> <p>All IEPs reviewed indicate the amount of time and frequency of the specially designed instruction.</p> <p>Interviews</p> <p>Starting in the 24-25 school year, the Career Center began implementing a universal tracking system for SDI delivery, which will include the logging of SDI minutes. While the team is still in the process of implementing and revising the system where needed, a majority of the team have already begun to use it.</p>	<p>Individual Correction</p> <p>N/A</p> <p>Systemic Correction</p> <p>N/A</p> <p>Opportunities for Improvement</p> <p>It is recommended that the team continue to implement the universal SDI tracking system to ensure documentation of SDI delivery for all students.</p>	<p><input checked="" type="checkbox"/> NA</p>

Record Review Item	Evidence of Findings	Evidence of Correction/Recommendations	Must be Addressed in CAP
DS-9	<p>34 CFR 300.324(a)(2)(v) [Development of IEP] OAC 3301-51-01(B)(3) [Applicability of requirements and definitions]</p> <p>The IEPs reviewed did not identify a need for assistive technology.</p>	<p><u>Individual Correction</u> N/A</p> <p><u>Systemic Correction</u> N/A</p>	<input checked="" type="checkbox"/> NA
DS-10	<p>34 CFR 300.320(a)(6)(i) [Definition of individualized education] OAC 3301-51-07 (H)(1)(g) [Definition of IEP]</p> <p>All IEPs reviewed identify accommodations provided to enable the child to be involved and make progress in the general education curriculum.</p> <p><u>Interviews</u></p> <p>Intervention Specialists at the Career Center create individualized folders for each teacher (both general education and lab instructors) that include a breakdown of IEP services and supports for the students on their rosters. These folders include what accommodations and modifications the students require as well as their measurable annual goals and accompanying SDI descriptions. While the folder system does appear to be effective, staff expressed that an expeditious alternative to consider is expanding SameGoal access to give general education teachers and lab instructors access to the IEPs of students on their rosters. It was noted by the associate educational agencies that there may be limits within the SameGoal platform that can limit additional users' access to the platform when shared between separate educational agencies.</p> <p>Interview sessions noted that general education teachers and lab instructors are consistently providing accommodations and modifications to students. Instructional staff stated that they are always willing to do what is necessary to help students succeed in their classes while still maintaining high expectations for all students. There is a consistent expectation across content areas that students will put their full effort into their daily work, but that staff are always there to support in any way a student needs.</p>	<p><u>Individual Correction</u> N/A</p> <p><u>Systemic Correction</u> N/A</p> <p><u>Opportunities for Improvement</u></p> <p>It is recommended to look into options to provide SameGoal access to instructional staff when appropriate at the Career Center. Differences in ability to give access may depend on if the district of residence or the Career Center authored the document.</p> <p>It is also recommended to consider adding explicit language surrounding context and duration to individual accommodations within Section 7 of the IEP. This may benefit all staff's understanding of how to use accommodations in practice across all classroom settings.</p>	<input checked="" type="checkbox"/> NA

Record Review Item	Evidence of Findings	Evidence of Correction/Recommendations	Must be Addressed in CAP
	<p><u>Concerns Noted</u></p> <p>While the accommodations were determined to be compliant across all reviewed records, some accommodation descriptions did not include language that clarified the context in which each accommodation should be used and the extent of each accommodation. While this is not needed for compliance in this area, it is recommended.</p>		
DS-11	<p>34 CFR 300.320(a)(4) [Definition of individualized education program] OAC 3301-51-07 (H)(1)(e) [Definition of IEP]</p> <p>All applicable IEPs reviewed identify modifications to enable the child to be involved and make progress in the general education curriculum.</p>	<p><u>Individual Correction</u> N/A</p> <p><u>Systemic Correction</u> N/A</p> <p><u>Opportunities for Improvement</u> Similarly to the accommodation section, it is recommended to describe the specific context and extent of modifications utilized with students. Consider the student's evaluation data when determining what content areas require the use of modifications and to what extend content needs to be modified.</p>	☒ NA
DS-12	<p>34 CFR 300.320(a)(4) [Definition of individualized education program] OAC 3301-51-07 (H)(1)(e) [Definition of IEP]</p> <p>One out of two, or 50% of applicable IEPs reviewed did not identify supports for school personnel to enable the child to be involved and make progress in the general education curriculum.</p> <p><u>Interviews</u></p> <p>It was consistently noted across all interview sessions that staff share a culture of collaboration at the Career Center. Teachers are willing to be flexible when finding time to co-plan, discuss student performance, or provide technical and instructional support to fellow colleagues. In previous years, weekly teacher-based team (TBT) meetings included general education teachers, lab instructors, and intervention specialists, but it was reported that this year, the structure of TBT groupings has</p>	<p><u>Individual Correction</u></p> <p>The educational agency must reconvene the teams of the IEPs identified as noncompliant to review the supports for school personnel that were identified by the IEP team and define the supports on the IEP including who will provide the support and when it will take place.</p> <p><u>Systemic Correction</u></p> <p>The educational agency must submit evidence to the Department of written procedures and practices regarding supports for school personnel. The Department will verify 100% compliance in this area through a review of new records that were written after the completion of the September 26th Internal Monitoring and Universal Supports trainings.</p>	☒ Yes This finding needs to be addressed in a Corrective Action Plan.

Record Review Item	Evidence of Findings	Evidence of Correction/Recommendations	Must be Addressed in CAP
	<p>changed. General education staff noted a desire to restructure TBT meetings to again include intervention specialists and lab instructors.</p> <p>Three out of the 4 intervention specialists on staff teach within the co-taught setting as one of their main responsibilities. A majority of coteaching pairs find time within their own schedules to co-plan, as it is not always possible to schedule pairs to have the same planning period. It was expressed that the most common practice is to utilize time at the beginning of the contractual day (prior to the arrival of students) as a co-planning space, however it can be challenging to find a consistent time to meet. During the 2025-26 school year, staff at the Career Center received professional development on co-teaching through SST 12. Interviewed staff expressed that this training has resulted in the implementation of new practices to benefit the efficacy of co-teaching at the Career Center. Additionally, interviewed staff expressed interest in further training in this area.</p> <p><u>Concerns Noted</u></p> <p>For the one record found noncompliant in this area, this was due to the statement not reflecting all required components of a Support for School Personnel statement:</p> <ul style="list-style-type: none"> • who is providing the support, • who is receiving the support, and • what specifically the support is. <p>While the statement did explain that a related service provider would be providing indirect services, the statement did not explicitly describe what the staff-to-staff support would be (including which staff members would be receiving the support or what the specific support would be).</p>	<p><u>Opportunities for Improvement</u></p> <p>Coshocton County Career Center along with its three associate educational agencies are strongly recommended to develop a procedure of checks and balances within their communication plan to ensure the support for school personnel section accurately reflects staff-to-staff supports.</p>	

Record Review Item	Evidence of Findings	Evidence of Correction/Recommendations	Must be Addressed in CAP
DS-13	<p>OAC 3301-51-07 (H)(1)(h)(ii) [Definition of IEP] One out of one, or 100% of applicable student records reviewed did not have a justification statement explaining why the student cannot participate in the regular assessment and why the alternate assessment is appropriate for the student.</p> <p>Concerns Noted For the reviewed record that identified use of the alternate assessment, the AASCD Decision-Making Tool was not signed by the parent.</p>	<p>Individual Correction The educational agency must reconvene the teams of the IEPs identified as noncompliant to review and determine if the alternate assessment is appropriate for the student.</p> <p>Systemic Correction The educational agency must submit evidence to the Department of written procedures and practices regarding the determination of participation in the AASCD. The Department will verify 100% compliance in this area through a review of new records that were written after the completion of the September 26th Internal Monitoring and Universal Supports trainings.</p>	<input checked="" type="checkbox"/> Yes This finding needs to be addressed in a Corrective Action Plan.
DS-14	<p>OAC 3301-51-07(L)(2) [Development, review and revision of IEP] All applicable student records reviewed show evidence of progress reporting data collected and analyzed to monitor performance on each goal.</p> <p>Interviews Intervention Specialists at the Career Center expressed that it can be difficult collecting sufficient data for progress reporting during the current four-week cycle.</p> <p>Concerns Noted Many of the reviewed progress reports were completed on a modified progress report form. While educational agencies can use modified progress reports, all required components from the Ohio optional form must still be included:</p> <ul style="list-style-type: none"> • Data Sources • Data Points • Comments • On Track Status/Goal Met Status <p>In addition, several Progress Reports contained data points that were difficult to determine alignment to the measurable annual goal skill and content. It is advised to consider what is being collected as data points to be featured in progress reporting to ensure an accurate reflection of progress on the specific skill described within the goal and objectives.</p>	<p>Individual Correction N/A</p> <p>Systemic Correction N/A</p> <p>Opportunities for Improvement Going forward, review the progress report forms that are available within SameGoal to ensure they meet the criteria stated under Concerns Noted.</p>	<input checked="" type="checkbox"/> NA

Record Review Item	Evidence of Findings	Evidence of Correction/Recommendations	Must be Addressed in CAP
DS-15	<p><i>OAC 3301-51-07(L) [Development, review and revision of IEP]</i></p> <p>All applicable IEPs reviewed show evidence that revisions were made based on data indicating changes in student needs or abilities.</p> <p><u>Interviews</u></p> <p>There has been an increased need to complete amendments due to more students taking advantage of opportunities such as double labs, where students, if credit requirements allow, complete a second CTE program for a dual certification. When students transfer to the Career Center, the staff may amend the IEP to change the educational setting (for SDI or overall classroom setting) based on where the student seems to be more successful within the new environment.</p> <p>When students first enroll and transfer from their district of residence, it is not common practice to immediately amend the IEP. However, after the student has been at the Career Center for over a week, if the team notices that changes to the IEP may be needed to better meet the needs of the student, the principal will communicate these potential changes to the special education director at the associate educational agencies to begin the process of amending the IEP.</p>	<p><u>Individual Correction</u> N/A</p> <p><u>Systemic Correction</u> N/A</p>	<input checked="" type="checkbox"/> NA
DS-16	<p><i>34 CFR 300.321(5) [IEP team]</i></p> <p><i>OAC 3301-51-07(l) [IEP team]</i></p> <p>All IEPs reviewed indicate that the IEP Team included a group of qualified professionals.</p> <p><u>Interviews</u></p> <p>Lab instructors expressed a desire to join more IEP meetings when possible. As the instructional staff that has the strongest understanding of students' performance within their chosen career field, the lab instructors feel that their in-person input during IEP meetings could enrich the decisions made by the IEP team, including the parent and student, especially in the area of transition planning.</p>	<p><u>Individual Correction</u> N/A</p> <p><u>Systemic Correction</u> N/A</p> <p><u>Opportunities for Improvement</u></p> <p>When possible, based on the scheduling needs of parents and staff, it is recommended to consider inviting lab instructors to IEP meetings.</p>	<input checked="" type="checkbox"/> NA

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

Each educational agency 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	Evidence of Findings	Evidence of Correction/Recommendations	Must be Addressed in CAP
LRE-1	<p>34 CFR 300.114 [LRE requirements] and 300.320(a)(5) [Definition of individualized education program] OAC 3301-51-07 (H)(1)(f) [Definition of individualized education program]</p> <p>Six out of seven, or 86% of applicable IEPs reviewed did not include an explanation of the extent to which the child will not participate with nondisabled children in the general education classroom.</p> <p><u>Interviews</u> No relevant concerns were noted from interview sessions.</p> <p><u>Concerns Noted</u> Reasons found for noncompliance in this area included:</p> <ul style="list-style-type: none"> • A discrepancy was noted between the setting described in the LRE statement and the setting/location described within the SDI section. • The LRE statement frequently did not include the reasons why the individual student's needs were best met in a setting outside of the general education setting, thereby reflecting that instruction and services could not be delivered in the general education setting effectively. 	<p><u>Individual Correction</u> The educational agency must reconvene the teams of the IEPs identified as noncompliant to review and include a justification as to why the child was removed from the general education classroom. 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 general classroom with supplementary aids and services. • Document that the nature or severity of the disability is such that education in general 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> The educational agency must submit evidence to the Department of written procedures and practices regarding the least restrictive environment placement decision process. The Department will verify 100% compliance in this area through a review of new records that were written after the completion of the September 26th Internal Monitoring and Universal Supports trainings.</p> <p><u>Opportunities for Improvement</u> Reviews by the internal monitoring teams within each educational agency will promote compliance in the area of LRE statements.</p>	<p><input checked="" type="checkbox"/> Yes</p> <p>This finding needs to be addressed in a Corrective Action Plan.</p>

Record Review Item	Evidence of Findings	Evidence of Correction/Recommendations	Must be Addressed in CAP
DIS-1	<p>34 CFR 300.530(e)(1) [Manifestation determination]</p> <p>One out of one, or 100% of applicable student records indicated that the educational agency did not conduct a manifestation determination to determine the relationship of the child's behavior of concern to the child's disability.</p> <p><u>Interviews</u></p> <p>Interviews with staff members from the associate educational agencies noted overall positive relationships between the partnering schools and the career center, however there were some differences in communication patterns, particularly in the reporting of disciplinary reports for student behaviors. The policy of the career center is to send a report to the student's district of residence when a disciplinary infraction occurs, however these messages were not consistently being received by the specific team members who were tracking these occurrences. The career center believed that the reports were being forwarded from a central office email to the correct parties, however when this discrepancy was discussed during the Next Steps meeting on November 6th, Coshocton County Career Center leadership noted that, going forward, they would cc the necessary parties directly when the report is sent to the associate educational agency.</p> <p><u>Concerns Noted</u></p> <p>For the one student whose records showed evidence of disciplinary removals of over ten days, a manifestation determination review was not scheduled due to a misunderstanding of what was needed for compliance. During the student's suspension, they continued to receive services from an intervention specialist at a nearby alternative school. Since the student was continuing to receive all IEP services at the alternative school, leadership believed that this removal did not constitute a change of placement. Leadership has confirmed that this process was clarified during the September 26th Internal Monitoring Training, and that, going forward, the school will consider comparable situations as reasons to conduct a manifestation determination review.</p>	<p><u>Individual Correction</u></p> <p>The educational agency will submit current student attendance records for all individual cases of noncompliance found, along with the following if applicable:</p> <ol style="list-style-type: none"> a. If the student has not experienced new disciplinary actions in the current school year, submit a statement to the Department. b. If the student has experienced new disciplinary actions in the current school year that resulted in a manifestation determination review (MDR), submit a copy of the MDR. c. If the student is no longer receiving services from the educational agency, submit evidence of withdrawal, transfer, graduation or exit from services. <p><u>Systemic Correction</u></p> <p>The educational agency must submit evidence to the Department of written procedures and practices regarding the manifestation determination review process. The Department will verify 100% compliance in this area through a review of new records that were written after the completion of the September 26th Internal Monitoring and Universal Supports trainings.</p> <p><u>Opportunities for Improvement</u></p> <p>The review and revision of the communication plan as well as internal policies and procedures will promote clarity on the manifestation determination process.</p>	<p><input checked="" type="checkbox"/> Yes</p> <p>This finding needs to be addressed in a Corrective Action Plan.</p>

Record Review Item	Evidence of Findings	Evidence of Correction/Recommendations	Must be Addressed in CAP
DIS-2	<p>34 CFR 300.530(e)(1) [Manifestation determination] Due to the findings in DS-1, this area was not applicable.</p>	<p><u>Individual Correction</u> N/A</p> <p><u>Systemic Correction</u> N/A</p>	<input checked="" type="checkbox"/> NA
DIS-3	<p>34 CFR 300.530(f)(1) (i)-(ii) [Determination that behavior was a manifestation] Due to the findings in DS-1, this area was not applicable.</p>	<p><u>Individual Correction</u> N/A</p> <p><u>Systemic Correction</u> N/A</p>	<input checked="" type="checkbox"/> NA
DIS-4	<p>34 CFR 300.530(f)(1) (i)-(ii) [Determination that behavior was a manifestation] Due to the findings in DS-1, this area was not applicable.</p>	<p><u>Individual Correction</u> N/A</p> <p><u>Systemic Correction</u> N/A</p>	<input checked="" type="checkbox"/> NA

Additional Considerations and Opportunities for Improvement:

To ensure systemic compliance going forward, it is strongly recommended to include the review and revision of the communication plan with all three associate educational agencies within the Corrective Action Plan. While reviewing the communication plan for revisions, consider all areas listed above that have reached a threshold of 30% noncompliance and above. These sections each individually list the recommendation to revise the communication plan under the Opportunities for Improvement section. The communication plan can help to ensure a clear process going forward if an ETR or IEP for a newly enrolled student includes areas of noncompliance. This process can be outlined within the communication plan as well as Coshocton County Career Center's special education procedures and practices.

In addition, the report above includes recommendations for the associate districts to review their own internal special education procedures and practices to determine if revisions based on this report will be helpful in ensuring systemic compliance going forward for all ETRs and IEPs.