

Academy for Urban Scholars – Youngstown
IRN: 013249

Ohio the Department of Education, Office for Exceptional Children
2021 IDEA Monitoring Review Summary Report

Introduction

The Ohio the Department of Education's Office for Exceptional Children would like to extend appreciation to the Academy for Urban Scholars – Youngstown 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 the Individuals with Disabilities Education Act (IDEA) requirements within the district. 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 review activities conducted by the Department during the week of September 26, 2022, as part of its general supervision requirements under IDEA and Am. Sub. H.B.1.

During the 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.

Monitoring 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

The Academy for Urban Scholars – Youngstown mailed 57 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 school. The notification of review was also posted on the Department's website.

The Department received no written comments.

2. Pre-Onsite Data Analysis

The Department conducted a comprehensive review which included district and grade-level data; Special Education Performance Profile; Ohio School Report Card; 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 review activities, the Department consultants reviewed 12 records of school-age students with disabilities. The Department consultants selected records of students with disabilities from a variety of disability categories and ages. Nine student records were selected for IEP verification in the classroom setting. During the IEP verifications, OEC staff noticed that teachers were very knowledgeable of the students' needs in their IEP and were able to talk to SST and OEC staff about students' goals and progress. In many cases, two teachers were present in the room. OEC staff also noted that students seemed to be appreciative of the support received from the teachers and have a great relationship with them.

4. Staff/Administrative Interviews

On September 27, the Department consultants held two sessions of interviews with 7 administrators and 16 teachers, school counselors, the school psychologist and other support staff. The Department interviews focused on the following review areas: Child Find; Delivery of Services; Least Restrictive Environment (LRE); and IEP alignment and Discipline.

Strengths/Commendations:

Administration emphasized their school does a really good job preparing students for current and future employment thanks to their programs, community partnerships and size. Students have a credential and hopefully find employment quickly when they leave their program. The most popular credential is advanced manufacturing, a program that students with disabilities seem to enjoy.

Staff stated they try hard to engage with parents and build relationships. Teachers are heavily involved with their students and are working with families, looking at the supports that are needed based on academics or behavior. Engagement coaches help with this also (five engagement coaches are working with students and everyone has access to the engagement coaches' notes).

Other school strengths emphasized by the school staff during interviews are:

- Wrap-around services focused on the student
- A financial opportunity center that helps scholars manage finances
- Workforce development that examines career paths for which students may be best suited
- Staff who meet with employers and track which students are employed
- School partnership with Columbiana training association so that students get monetary stipends for earning credentials (Earn to Learn. Students can earn financial opportunities when they earn a credential.)
- Inclusion classroom and resource room for extra support for all students
- Working for the past two years on a Positive Behavioral Interventions and Supports (PBIS) system with State Support Team 5 to create a holistic approach and culture.

Staff members are aware they work in a particular type of school with a particular type of student. They accept their students with open arms and, as they stated, have a "stomach for behaviors" that other, more traditional schools may not. Staff state they talk to their students more and give them more chances to succeed.

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 adriana.golumbeanu@education.ohio.gov within 30 school days from the date of this report. The Department will review the corrective action plan 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 CAP has been approved.

CAP Due Date: February 2, 2023

Department Trainings

As part of the Department monitoring process, Academy for Urban Scholars – Youngstown personnel, as identified by the Department, are required to complete the OEC Required Special Education Process course within the Learning Management System (LMS). The Department will provide specific instructions on completing these training modules. Participants must achieve an 80% or more on each quiz. Participants who do not achieve at least 80% will be contacted by the State Support Team (SST) for additional training.

Completion of LMS Training Modules Due Date: February 2, 2023

Individual Correction

The educational agency has **60 school days** from the date of this summary report to correct all identified findings of noncompliance for individual students whose records were selected and reviewed by the 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: March 29, 2023

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: **September 15, 2023***

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

For questions regarding the review, please contact: Adriana Golumbeanu, the Department's IDEA Monitoring Contact, at 614-965-2422, toll-free at 877-644-6338, or by e-mail at adriana.golumbeanu@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, 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	Record Review	<p>34 CFR 300.305(a) [Review of Existing evaluation data] and OAC 3301-51-11 (c)(1)(a) [Preschool children eligible for special education]</p> <p>Preschool records were not reviewed.</p>		<input checked="" type="checkbox"/> NA
CF-2	Record Review	<p>OAC 3301-51-06 [Evaluations]</p> <p>Nine out of 12 evaluations reviewed, or 75%, did not appropriately document interventions provided to resolve concerns for the child performing below grade-level standards.</p>	<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 educational agency must submit evidence to the Department of written procedures and practices regarding documentation of intervention and supports provided prior to completion of the initial and reevaluation team report.</p> <p><u>Opportunities for Improvement</u></p> <p>Academy for Urban Scholars-Youngstown would benefit from reviewing and revising their RtI processes. Once revised, the educational agency would benefit from providing professional learning to all staff on the process and procedures. Monitoring from administrative staff would be beneficial to ensure there is consistency in the implementation of the processes and procedures. Additionally, Academy for Urban Scholars-Youngstown would benefit from technical assistance from SST 5 on how to accurately document interventions in Part 2 of the Evaluation Team Report.</p>	<input checked="" type="checkbox"/> Yes The educational agency needs to address this finding in a Corrective Action Plan.
	Interviews/Public Comments	<p>From interviews with school staff, it was noted that staff are familiar with the Response to Intervention (RtI) process, but they still need to expand and improve it to better identify students who are struggling. Interview participants also confirmed that, although interventions are provided through various processes across the educational agency, the results are not uniformly documented.</p>		
	Concerns Noted	<p>The educational agency must provide a summary of actual interventions in this section and not simply a list of possible accommodations. For reevaluations, if no additional interventions were provided, noting that the team agreed the current IEP supports and services are suitable to meet the student’s needs will suffice.</p>		

Record Review Item	Evidence of Findings		Evidence of Corrections/Recommendations	Must be addressed in CAP
CF-3	Record Review	<p>34 CFR 300.501(b) [Parent participation in meetings] and OAC 3301-51-06 (E)(2)(a) [Evaluation procedures].</p> <p>Five out of 12 student records reviewed, or 42%, did not show evidence that the parent was afforded the opportunity to participate in the evaluation team planning process.</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. The evidence may include evaluation planning form, prior written notice, parent invitation, referral form or communication log.</p> <p>If the educational agency cannot provide documentation that the parent was involved or provided the opportunity to participate in the evaluation planning process, the educational agency must conduct a reevaluation planning conference with the parent.</p> <p><u>Systemic Correction</u></p> <p>The educational agency must submit evidence to the Department of written procedures and practices that include the parent in the evaluation planning process.</p> <p><u>Opportunities for Improvement</u></p> <p>Participation and required signatures can be documented by email attachment, standard mail, scanned signature, photograph of the signature or any other electronic means.</p>	<p><input checked="" type="checkbox"/> Yes</p> <p>The educational agency needs to address this finding in a Corrective Action Plan.</p>
	Interviews/Public Comments	<p>Interviewees described coordinated efforts to communicate with parents and involve them in their children’s educational process whenever possible.</p>		
	Concerns Noted	<p>Most of the meetings were conducted by phone. In most cases, there was no OP-9. Evidence documenting attempts to ensure parental participation prior to the ETR Meeting needs to be shown.</p>		
CF-4	Record Review	<p>34 CFR 300.300 [Parental Consent]</p> <p>Six out of 12 student records review, or 50%, did not provide evidence of parental consent obtained prior to new testing.</p>	<p><u>Individual Correction</u></p> <p>The educational agency must provide evidence that the parent 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 (PR-01), parent invitation (PR-02), communication log, or other documented attempts to obtain parental informed, written consent (OP-9).</p> <p>If the educational agency cannot provide documentation that the parent provided informed, written consent for evaluation, or did not respond to</p>	<p><input checked="" type="checkbox"/> Yes</p> <p>The educational agency needs to address this finding in a Corrective Action Plan.</p>
	Interviews/Public Comments	<p>A digital signature was not used consistently. The new leadership will ensure that a digital signature, when necessary, will be used consistently.</p>		
	Concerns Noted	<p>Parents must give informed, written consent for any new assessment of their student for purposes of evaluating or reevaluating eligibility for special education services. If written consent is given electronically, that documentation needs to be included in the ETR paperwork.</p>		

Record Review Item	Evidence of Findings		Evidence of Corrections/Recommendations	Must be addressed in CAP
			<p>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 educational agency must submit evidence to the Department of written procedures and practices for obtaining parental consent obtained prior to new testing or policies and practices for moving forward when parents will not participate.</p> <p><u>Opportunities for Improvement</u></p> <p>There is an opportunity for Academy for Urban Scholars-Youngstown to strengthen the policies and practices on obtaining written, informed consent for evaluations.</p>	
CF-5	Record Review	<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>Eleven (11) out of 12 evaluations reviewed, or 92%, did not provide evidence that the evaluation addresses all areas related to the suspected disability.</p>	<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 educational agency must submit evidence to the Department of written procedures and practices to provide evidence that the evaluation addresses all areas related to the suspected disability.</p> <p><u>Opportunities for Improvement</u></p> <p>It is recommended that Academy for Urban Scholars-Youngstown develop an internal procedure to monitor the assessments indicated on the planning form to ensure that they are completed as noted by the team and included in the Part 1 Individual Evaluator's Assessment Report of each ETR.</p>	<p><input checked="" type="checkbox"/> Yes</p> <p>The educational agency needs to address this finding in a Corrective Action Plan.</p>
	Interviews/Public Comments	<p>Staff stressed that a lot of students come with IEPs from other schools/districts. Teachers stated that additional professional development on how to write Part 1s would be beneficial.</p>		
	Concerns Noted	<p>Assess all areas related to the disability, as listed on the planning form, as appropriate for the suspected disability. (For example, suspected SLD must have an observation.)</p> <p>Items listed in the planning form were not present in Part 1 of the ETR. In some cases, the observation was summarized in Part 2 but there was no Part 1 for Observation. On some records,</p>		

Record Review Item	Evidence of Findings	Evidence of Corrections/Recommendations	Must be addressed in CAP
	no one is listed as responsible on Planning Form, or the term “considered” is listed; no items are listed under Areas of Assessment.		
CF-6	Record Review 34 CFR 300.306(c) [Procedures for determining eligibility and educational need] Nine out of 12 evaluations reviewed, or 75%, did not show evidence of clearly stating the summary of assessment results.	<u>Individual Correction</u> 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. <u>Systemic Correction</u> The educational agency must submit evidence to the Department of written procedures and practices regarding summary of data and assessment results. <u>Opportunities for Improvement</u> Academy for Urban Scholars-Youngstown has an opportunity to develop an internal practice that will monitor the completion of the Part 2 Summary of the Evaluation Team Report so that all areas assessed in a Part 1 Individual Evaluator’s Assessment are summarized in the Part 2 summary. This is an opportunity for professional development and/or targeted technical assistance from SST staff.	<input checked="" type="checkbox"/> Yes The educational agency needs to address this finding in a Corrective Action Plan.
	Interviews/Public Comments As mentioned above, teachers stated that additional professional development on how to write Part 1s would be beneficial.		
	Concerns Noted In most cases, information included in the summary was copied and pasted from Part 1 Individual Evaluator’s Assessment and not summarized in a clear and concise manner for the parent/guardian to understand or for the IEP team to develop an actionable IEP. All Part 1 information must be summarized in Part 2 even if it was determined that the area in which the evaluation assessed was not impacting student performance.		
CF-7	Record Review 34 CFR 300.306(c) [Procedures for determining eligibility and educational need] Nine out of 12 evaluation team reports reviewed, or 75%, did not contain a clear and succinct description of educational needs.	<u>Individual Correction</u> 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. <u>Systemic Correction</u> The educational agency must submit evidence to the Department of written procedures and practices regarding description of educational needs.	<input checked="" type="checkbox"/> Yes The educational agency needs to address this finding in a Corrective Action Plan.
	Interviews/Public Comments As mentioned above, teachers stated that additional professional development on how to write Part 1s would be beneficial.		
	Concerns Noted The information summarized lacked specific information to allow creating academic goals for students or the educational needs were generic in nature and not individualized based on the		

Record Review Item	Evidence of Findings		Evidence of Corrections/Recommendations	Must be addressed in CAP
		summary of assessment results. Educational needs that will allow the IEP team to develop academic and/or functional goals in the IEP should be written in a way, and include enough information, that allows for them to be used by the IEP team to develop meaningful and actionable goals and services.	<u>Opportunities for Improvement</u> Academy for Urban Scholars-Youngstown has an opportunity to develop an internal procedure that will assist staff in monitoring the completion of the Part 2 Summary of Educational Needs so that the educational needs listed in a Part 1 Individual Evaluator's Assessment are summarized in the Part 2 Summary of Educational Needs. This is an opportunity for professional development and/or targeted technical assistance from SST staff.	
CF-8	Record Review	<i>34 CFR 300.306(c) [Procedures for determining eligibility and educational need]</i> Seven out of 12 evaluation team reports reviewed, or 58%, did not contain specific implications for instruction.	<u>Individual Correction</u> The educational agency will reconvene the ETR teams to conduct a reevaluation and provide a clear description of specific implications for instruction. The IEP team must consider the results of this reevaluation.	<input checked="" type="checkbox"/> Yes The educational agency needs to address this finding in a Corrective Action Plan.
	Interviews/Public Comments	As mentioned above, teachers stated that additional professional development on how to write Part 1s would be beneficial.	<u>Systemic Correction</u> The educational agency must submit evidence to the Department of written procedures and practices regarding implications for instruction.	
	Concerns Noted	In some records, the implications for instruction were generic in nature and not specific to the needs of the child. The wrong student name was included in the implications section in one of the records.	<u>Opportunities for Improvement</u> Implications for instruction can be strengthened through the Learning Management System modules as well as the Internal Monitoring Training that will be provided by the Office for Exceptional Children and supported by SST staff.	

Record Review Item	Evidence of Findings		Evidence of Corrections/Recommendations	Must be addressed in CAP
CF-9	Record Review	<p>34 CFR 300.306(a)(1) [Determination of eligibility] OAC 3301-51-01 (B)(21) [Applicability of requirements and definitions]</p> <p>Three out of 12 evaluations reviewed, or 25%, 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>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 educational agency must submit evidence to the Department of written procedures and practices regarding the eligibility determination process.</p>	<p><input checked="" type="checkbox"/> No</p> <p>The educational agency does <u>not</u> need to address this finding in a Corrective Action Plan.</p>
	Interviews/Public Comments	<p>School administration stated they try to make sure that everyone is able to participate. They reschedule meetings if there are several individuals who are not able to attend.</p>		
	Concerns Noted			
CF-10	Record Review	<p>OAC 3301-51-01 (B)(10) [Definitions] and 3301-51-06 [Evaluations]</p> <p>Eight out of 12 evaluations reviewed, or 67%, did not provide a justification for the eligibility determination decision.</p>	<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 educational agency must submit evidence to the Department of written procedures and practices regarding the eligibility determination decision.</p> <p><u>Opportunities for Improvement</u></p> <p>Academy for Urban Scholars-Youngstown has the opportunity to participate in professional development and/or targeted technical assistance in determining special education eligibility. This training should include how to document how the disability affects the student and their progress in the general education curriculum.</p>	<p><input checked="" type="checkbox"/> Yes</p> <p>The educational agency needs to address this finding in a Corrective Action Plan.</p>
	Interviews/Public Comments			
	Concerns Noted	<p>In many cases, the evaluations did not provide an appropriate justification statement that included how the disability affects the student's progress in the general education curriculum and how the student specifically meets the eligibility criteria. In some records, the basis for eligibility area mentions the wrong disability category.</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
DS-1	Record Review	<p>SPP Indicator 13 34 CFR 300.320(b) [Transition services] OAC 3301-51-07 (H)(2) [Definition of individualized education program]</p> <p>All 12 IEPs reviewed, or 100%, did not show evidence that the postsecondary transition plan met all eight required elements of the IDEA for the student, specifically in the following area(s):</p> <ol style="list-style-type: none"> 1. There are appropriate measurable postsecondary goal(s). 2. The postsecondary goals are updated annually. 3. The postsecondary goals were based on age-appropriate transition assessment (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 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>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 or provide documentation of the student's withdrawal date from the educational agency.</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.</p> <p><u>Opportunities for Improvement</u></p> <p>There is an opportunity to strengthen the development of IEP transition services by conducting thorough, relevant, and comprehensive Age-Appropriate Transition Assessments so that services are individualized based upon each student's needs, strengths, interests and preferences.</p> <p>Training and technical assistance should be provided to all ETR and IEP members responsible for assessing and writing transition plans to ensure they are compliant and beneficial to the student.</p> <p>Academy for Urban Scholars-Youngstown would benefit from developing an internal review/monitoring process to ensure that transition plans are not missing essential components.</p>	<p><input checked="" type="checkbox"/> Yes</p> <p>The educational agency needs to address this finding in a Corrective Action Plan.</p>
	Interviews/Public Comments	<p>Staff mentioned that Career-Based Intervention staff work with the school psychologist to collect AATA data and with every scholar to find out what the scholar wants to do after school. The school uses various assessments to determine what that</p>		

Record Review Item	Evidence of Findings		Evidence of Correction/Recommendations	Must be addressed in CAP
		<p>is, like Brigrance for financial literacy and the Ohio Means Jobs backpack and learning inventory.</p> <p>Several records showed that the postsecondary goals and the transition service(s) remained the same as in the previous IEPs. Therefore, is there evidence that the transition services were delivered as written, and what were the outcomes?</p> <p>Many times, the current goal(s) did not reflect the current information/data from the AATA.</p> <p>Several transition activities were not individualized or seemed to be available to all students.</p> <p>Please remember that the postsecondary goal(s) need to occur after the student has graduated from high school.</p>		
DS-2	Record Review	<p>34 CFR 300.320(a)(1) [Definition of individualized education program]</p> <p>All 12 IEPs reviewed, or 100%, did not contain Present Levels of Academic Achievement and Functional Performance (PLOP) that addressed the needs of the student.</p>	<p><u>Individual Correction</u></p> <p>The 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:</p> <ul style="list-style-type: none"> • Summary of current daily academic/ behavior and/ or functional performance (strengths and needs) compared to expected grade-level standards in order to provide a frame of reference. • Baseline data provided for developing a measurable goal. <p>Note: PLOP must relate to the goal measurement.</p> <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.</p>	<input checked="" type="checkbox"/> Yes The educational agency needs to address this finding in a Corrective Action Plan.
	Interviews/Public Comments	<p>The universal data system the school is using should be helpful to determine the baseline data.</p> <p>The new compliance department is now fully staffed and will ensure records are compliant and are free of errors.</p>	<p><u>Opportunities for Improvement</u></p> <p>There is the opportunity for Academy for Urban Scholars-Youngstown to develop an Internal Monitoring team that will review and monitor the PLOP to ensure it addresses the individual needs of the</p>	

Record Review Item	Evidence of Findings		Evidence of Correction/Recommendations	Must be addressed in CAP
	Concerns Noted	<p>Most of the IEPs reviewed did not contain baseline data in the PLOP that aligned to the measurable goals. The PLOP must also include a comparison statement to grade-level expectations, which was missing in some of the reviewed IEPs.</p> <p>Some PLOPs had the wrong student names.</p>	<p>student and aligns to the condition, behavior/skill and performance criteria of the measurable annual goal. Technical assistance can be of benefit in helping service providers identify means of obtaining student present levels of performance.</p>	
DS-3	Record Review	<p>34 CFR 300.320(a)(2)(i) [Definition of individualized education program]</p> <p>Ten out 12 IEPs reviewed, or 83%, did not contain measurable annual goals.</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. <u>Clearly 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.</p> <p><u>Opportunities for Improvement</u></p> <p>There is an opportunity for Academy for Urban Scholars-Youngstown to develop an Internal Monitoring team that will review and monitor the measurable annual goals to ensure compliance in this area. Technical assistance can be of benefit in helping service providers write goals that include a clearly defined condition, behavior/skill and performance criteria.</p>	<p><input checked="" type="checkbox"/> Yes</p> <p>The educational agency needs to address this finding in a Corrective Action Plan.</p>
	Interviews/Public Comments	<p>The new compliance department is now fully staffed and will ensure records are compliant and are free of errors.</p>		
	Concerns Noted	<p>Many of the reviewed IEPs had measurable goals that had one or more elements of the goal missing or the element was unclear as written. Some goals had multiple behaviors listed with only one performance criteria, making it unclear as to how the behaviors would be measured.</p> <p>Some goals had the wrong student names.</p>		

Record Review Item	Evidence of Findings		Evidence of Correction/Recommendations	Must be addressed in CAP
DS-4	Record Review	<p>34 CFR 300.320(a)(2)(i) [Definition of individualized education program]</p> <p>Two out of 12 IEPs reviewed, or 17%, did not contain annual goals that addressed the child's academic area(s) of need.</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><input checked="" type="checkbox"/> No</p> <p>The educational agency does <u>not</u> need to address this finding in a Corrective Action Plan.</p>
	Interviews/Public Comments		<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 addressing identified academic needs.</p>	
	Concerns Noted		<p><u>Opportunities for Improvement</u></p> <p>There is an opportunity for professional development and targeted technical assistance in documenting academic needs mentioned in the ETR. If academic needs were listed in the ETR or IEP profile as being an area of concern, they must be addressed in the IEP in some capacity. The academic need can either be addressed through services and/or supports or a statement that indicates the team has prioritized needs or found that it is not an area of concern at this time.</p>	
DS-5	Record Review	<p>34 CFR 300.320(a)(2)(i) [Definition of individualized education]</p> <p>One out of five applicable IEPs reviewed, or 20%, did not contain annual goals that address the child's functional area(s) of need.</p>	<p><u>Individual Correction</u></p> <p>The educational agency must reconvene the team of the IEP identified as noncompliant to review and amend the IEP. Annual goals must address the functional 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><input checked="" type="checkbox"/> No</p> <p>The educational agency does <u>not</u> need to address this finding in a Corrective Action Plan.</p>
	Interviews/Public Comments	<p>Administrators stressed during interviews that teachers are heavily involved in taking notes on students' behaviors and that the five engagement coaches are assisting as well. The school needs to ensure that all these data are reflected in students' ETRs and IEPs.</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 addressing identified functional needs.</p>	
	Concerns Noted	<p>One record indicated functional needs (such as behavior) in the current ETR or IEP profile;</p>		

Record Review Item	Evidence of Findings		Evidence of Correction/Recommendations	Must be addressed in CAP
	<p>however, these needs were not addressed in the IEP. If the IEP team has determined there is no longer a need in a functional area, a statement to this effect would need to be included.</p>		<p><u>Opportunities for Improvement</u> There is an opportunity for professional development and targeted technical assistance in writing compliant IEPs that document all functional needs identified in the ETR. If functional needs were listed in the ETR or IEP profile as being an area of concern, they must be addressed in the IEP in some capacity. The functional need can either be addressed through services and/or supports or a statement that indicates the team has prioritized needs or found that it is not an area of concern at this time.</p>	
DS-6	Record Review	<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 12 IEPs reviewed, or 83%, did not contain a statement of specially designed instruction that addresses the individual needs of the child and supports the annual goals.</p>	<p><u>Individual Correction</u> The educational agency must reconvene the teams of the IEPs identified as noncompliant to review and amend the specially designed instruction to address the needs of the child.</p> <p><u>Systemic Correction</u> The educational agency must submit evidence to the Department of written procedures and practices regarding the IEP process of determining specially designed instruction, including related services, as appropriate.</p>	<input checked="" type="checkbox"/> Yes The educational agency needs to address this finding in a Corrective Action Plan.
	Interviews/Public Comments	<p>From the interviews, it looks like the school is using the IXL program to track the provision of SDI. IXL should not be used to track SDI if students are working on their own on this program. Other staff mentioned that they keep a binder to track when services are delivered.</p>	<p><u>Opportunities for Improvement</u> Academy for Urban Scholars-Youngstown would benefit from professional development and technical assistance in understanding what SDI is and how to develop SDI based upon each student's specific academic and/or functional needs. Additionally, the staff who develop IEPs would benefit from professional development on how to complete Section 7, providing clear statements of SDI which describe the nature of instruction that aligns to the individual needs of the student and supports achievement of the measurable annual goals. SDI should describe skills and methods used in the instruction of the measurable annual goals.</p>	
	Concerns Noted	<p>Statements were vague or unclear to the nature of the instruction that aligns with the need(s) of the child and support achievement of annual goals. Many records evidenced lack of individualization and specificity that would make this instruction specialized. Records also had, in lieu of SDI, a list of services and accommodations.</p> <p>In some records, the specially designed instruction was not different from the instruction delivered in the general education classroom.</p> <p>Most of the records had multiple providers in the SDI area. Only the intervention specialist or related</p>		

Record Review Item	Evidence of Findings		Evidence of Correction/Recommendations	Must be addressed in CAP
		<p>service provider that will be delivering specially designed instruction for the goal and the amount and frequency with which that is occurring should be listed in this area. General education teachers or other professionals should be indicated in supports for school personnel to consult with intervention specialist on specially designed instruction.</p> <p>One-on-one instruction and small group instruction were not separated into two SDI sections. They need to be separated, along with specific amounts of time and/or frequency the student will receive SDI in each setting.</p>	<p>An internal monitoring and review system would also be very helpful to promote compliance.</p>	
DS-7	Record Review	<p>34 CFR 300.320(a)(7) [Definition of individualized education program] OAC 3301-51-07 (H)(1)(i) [Definition of IEP]</p> <p>Ten (10) out of 12 IEPs reviewed, or 83%, did not indicate the specific location where the specially designed instruction, including related services, will be provided.</p>	<p><u>Individual Correction</u> 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><u>Systemic Correction</u> The educational agency must submit evidence to the Department of written procedures and practices regarding the IEP process of determining the location where specially designed instruction, including related services, will occur.</p> <p><u>Opportunities for Improvement</u> Training and technical assistance from SST staff as well as an internal monitoring review system would be very helpful to promote compliance in the areas of specially designed instruction, including documenting the location of the provision of SDI.</p>	<input checked="" type="checkbox"/> Yes The educational agency needs to address this finding in a Corrective Action Plan.
	Interviews/Public Comments			
	Concerns Noted	<p>Multiple locations for services were listed together; they must be listed separately.</p>		

Record Review Item	Evidence of Findings		Evidence of Correction/Recommendations	Must be addressed in CAP
DS-8	Record Review	<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 12 IEPs reviewed, or 25%, did not indicate the amount of time and frequency of the specially designed instruction, including related services.</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 amount of time and frequency of the specially designed instruction, including related services.</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 the amount and frequency of specially designed instruction, including related services, to be provided.</p> <p><u>Opportunities for Improvement</u></p> <p>Training and technical assistance from SST staff as well as an internal monitoring review system would be very helpful to promote compliance in the areas of specially designed instruction, including documenting the amount of time and frequency of the provision of SDI.</p>	<input checked="" type="checkbox"/> No The educational agency does <u>not</u> need to address this finding in a Corrective Action Plan.
	Interviews/Public Comments			
	Concerns Noted			
DS-9	Record Review	<p>34 CFR 300.324(a)(2)(v) [Development of IEP] OAC 3301-51-01(B)(3) [Applicability of requirements and definitions]</p> <p>Assistive technology to enable the child to be involved and make progress in the general education curriculum was not applicable for the records reviewed.</p>	<p><u>Individual Correction</u></p> <p>NA</p> <p><u>Systemic Correction</u></p> <p>NA</p>	<input checked="" type="checkbox"/> NA
	Interviews/Public Comments			
	Concerns Noted			

Record Review Item	Evidence of Findings		Evidence of Correction/Recommendations	Must be addressed in CAP
DS-10	Record Review	<p>34 CFR 300.320(a)(6)(i) [Definition of individualized education] OAC 3301-51-07 (H)(1)(g) [Definition of IEP]</p> <p>Nine out of 12 IEPs reviewed, or 75%, did not identify accommodations provided to enable the child to be involved and make progress in the general education curriculum.</p>	<p><u>Individual Correction</u></p> <p>The educational agency must reconvene the teams of the IEPs identified as noncompliant to review the accommodations that would directly assist the child to access the course content without altering the scope or complexity of the information taught and include them on the IEP.</p> <p><u>Systemic Correction</u></p> <p>The educational agency must submit evidence to the Department of written procedures and practices regarding accommodations.</p> <p><u>Opportunities for Improvement</u></p> <p>Training from SST staff as well as an internal monitoring review system would be very helpful to promote compliance in the area of accommodations.</p>	<input checked="" type="checkbox"/> Yes The educational agency needs to address this finding in a Corrective Action Plan.
	Interviews/Public Comments			
	Concerns Noted	<p>The condition(s) and/or extent were not clearly explained (who provided the services and when and where those services were provided).</p> <p>In several records, the Implications sections of Parts 1 and 2 of the ETR identify accommodations which needed to be addressed in the IEP but were not.</p>		
DS-11	Record Review	<p>34 CFR 300.320(a)(4) [Definition of individualized education program] OAC 3301-51-07 (H)(1)(e) [Definition of IEP]</p> <p>There were no applicable IEPs for this review item (modifications to enable the child to be involved and make progress in the general education curriculum).</p>	<p><u>Individual Correction</u></p> <p>NA</p> <p><u>Systemic Correction</u></p> <p>NA</p>	<input checked="" type="checkbox"/> NA
	Interviews/Public Comments			
	Concerns Noted			

Record Review Item	Evidence of Findings		Evidence of Correction/Recommendations	Must be addressed in CAP
DS-12	Record Review	<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 applicable IEP reviewed, or 100%, 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>Individual Correction</u></p> <p>The educational agency must reconvene the team of the IEP 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.</p> <p><u>Opportunities for Improvement</u></p> <p>Training from SST staff as well as an internal monitoring review system would be very helpful to promote compliance in the area of supports for school personnel.</p>	<input checked="" type="checkbox"/> Yes The educational agency needs to address this finding in a Corrective Action Plan.
	Interviews/Public Comments			
	Concerns Noted	<p>The record seems to indicate in this box the support that the intervention specialist will provide to the general education teacher. This is where the general education teacher or other professional would be indicated as providing support, and not the intervention specialist. The area must detail what support will be provided to the intervention specialist or related service provider and who will deliver the support. Adult-to-adult consultation must be described in this section.</p>		
DS-13	Record Review	<p>OAC 3301-51-07 (H)(1)(h)(ii) [Definition of IEP]</p> <p>There were no applicable IEPs for this review item (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><u>Individual Correction</u></p> <p>NA</p> <p><u>Systemic Correction</u></p> <p>NA</p>	<input checked="" type="checkbox"/> NA
	Interviews/Public Comments			
	Concerns Noted			

Record Review Item	Evidence of Findings		Evidence of Correction/Recommendations	Must be addressed in CAP
DS-14	Record Review	<p><i>OAC 3301-51-07(L)(2) [Development, review and revision of IEP]</i></p> <p>Eleven (11) out of 12 student records reviewed, or 92%, did not show evidence of progress reporting data collected and analyzed to monitor performance on each goal.</p>	<p><u>Individual Correction</u></p> <p>None</p> <p><u>Systemic Correction</u></p> <p>The educational agency must submit evidence to the Department of written procedures and practices regarding progress reports on measurable annual goals.</p> <p><u>Opportunities for Improvement</u></p> <p>Training from SST staff as well as an internal monitoring review system would be very helpful to promote compliance in the area of progress monitoring.</p>	<p><input checked="" type="checkbox"/> Yes</p> <p>The educational agency needs to address this finding in a Corrective Action Plan.</p>
	Interviews/Public Comments	<p>From the interviews, it seems that a lead teacher keeps the IEP at a glance updated and in Teacher Based Teams staff have the chance to talk about the students and the progress they are making. This is not reflected in student records.</p>		
	Concerns Noted	<p>In many cases, there was no evidence of data collected and/or reported on each annual transition goal through progress reports. Progress on goals should be reported in alignment to the measurement used in the annual goal statement.</p>		
DS-15	Record Review	<p><i>OAC 3301-51-07(L) [Development, review and revision of IEP]</i></p> <p>One out of one applicable IEP reviewed, or 100%, did not show evidence that revisions were made based on data indicating changes in student needs or abilities.</p>	<p><u>Individual Correction</u></p> <p>The educational agency must reconvene the teams to review and amend the IEPs to reflect changes made based on current needs or abilities.</p> <p><u>Systemic Correction</u></p> <p>The educational agency must submit evidence to the Department of written procedures and practices regarding using data to revise IEPs based on changes in student needs or abilities.</p> <p><u>Opportunities for Improvement</u></p> <p>Training from SST staff as well as an internal monitoring review system would be very helpful to promote compliance in the area of IEP revisions based on data.</p>	<p><input checked="" type="checkbox"/> Yes</p> <p>The educational agency needs to address this finding in a Corrective Action Plan.</p>
	Interviews/Public Comments			
	Concerns Noted	<p>On the one applicable record, data indicated need for possible revision, but no revision or meeting to discuss instructional strategies is evident in the student's records. The IEP team should have reconvened to address the issue of chronic absences.</p>		

Record Review Item	Evidence of Findings		Evidence of Correction/Recommendations	Must be addressed in CAP
DS-16	Record Review	<p>34 CFR 300.321(5) [IEP team] OAC 3301-51-07(I) [IEP team]</p> <p>One out of 12 IEPs reviewed, or 8%, did not indicate that the IEP Team included a group of qualified professionals.</p>	<p><u>Individual Correction</u></p> <p>For the IEPs identified as noncompliant, the educational agency 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 educational agency 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 with all required members present. <p><u>Systemic Correction</u></p> <p>The educational agency must submit evidence to the Department of written procedures and practices regarding the involvement of people qualified to interpret the instructional implications of evaluation results in the IEP process.</p>	<p><input checked="" type="checkbox"/> No</p> <p>The educational agency does <u>not</u> need to address this finding in a Corrective Action Plan.</p>
	Interviews/Public Comments			
	Concerns Noted			

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	Record Review	<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>Eleven (11) out of 12 IEPs reviewed, or 92%, 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>Individual Correction</u></p> <p>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.</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 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></p> <p>The educational agency must submit evidence to the Department of written procedures and practices regarding the least restrictive environment placement decision process.</p> <p><u>Opportunities for Improvement</u></p> <p>Academy for Urban Scholars-Youngstown will benefit from training from SST staff on the continuum of alternative placements for all students. Additional training and technical assistance would benefit staff members developing LRE statements to ensure that the statements provide a justification for why the student is not participating in the general education environment based on the individual student’s need(s) and align with the specially designed instruction and/or related services location listed in section 7 of the IEP.</p>	<p><input checked="" type="checkbox"/> Yes</p> <p>The educational agency needs to address this finding in a Corrective Action Plan.</p>
	Interviews	<p>School administration stressed that the school is an inclusion-based school and that there is no full-time resource room, in order to make the environment as inclusive as possible.</p> <p>Placement starts with the least restrictive environment, even when students come from a more restrictive environment in another school. This needs to be reflected in the student records.</p>		
	Concerns Noted	<p>Many of the reviewed IEPs did not provide a justification statement as to why the student could not be served in the general education setting. This statement must be based upon individual student needs. This statement must also match the location listed in Section 7 for specially designed instruction.</p>		

Opportunities for Improvement:

- Develop a formal process of tracking specially designed instruction (SDI) to ensure a Free Appropriate Public Education (FAPE) for students. The IXL program should not be used to track SDI but can be used to track the date and time students are working on tasks individually.
- A lot of the information described in the IEP cannot be found in the ETR. If information is taken from a previous ETR, ensure that a Part 1 that describes this information can be found in the current ETR.
- Progress Monitoring: Progress Monitoring is extremely important in creating IEPs that are best suited for individual student needs. There is a need for professional development regarding what must be monitored, how that information connects to student need, and the tracking of progress toward annual IEP goals. Procedures should be developed to ensure parents/guardians receive the progress updates for their child.
- There is a need for the Academy for Urban Scholars-Youngstown to examine practices regarding documentation of student needs in the IEP, which is detailed in the record review summary. The school should consider how they can improve documentation of student needs more thoroughly within the IEP and ensure the information in Section 7 of the IEP matches what is also written in the Least Restrictive Environment section.
- There is an opportunity for improvement for Academy for Urban Scholars-Youngstown regarding attendance policies, procedures, and practices. What is the procedure for staff to follow when students do not attend their learning opportunities?
- Staff stressed that a lot of students come with IEPs from other schools/districts. With the large turnover of students, there is a need for Academy for Urban Scholars-Youngstown to develop a formal process of adopting special education records from out of district or state. This will help to ensure that students are receiving services and supports based upon their individualized needs and that records are compliant.
- During the interview sessions, teachers indicated professional development (PD) opportunities are easily accessible and encouraged. It would be beneficial for Academy for Urban Scholars-Youngstown staff to attend PD offerings by SST staff to stay up to date and current on special education law, best practices, and guidance.