

**Black River Career Prep High School
IRN: 142919****Ohio Department of Education and Workforce
Office for Exceptional Children
2023-2024 IDEA Monitoring Review Summary Report****Introduction**

The Ohio Department of Education and Workforce, Office for Exceptional Children, would like to extend appreciation to the Black River Career Prep High School 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 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 onsite review conducted by the Department on February 22 and 23, 2024, 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 Providers and Administrator Interviews.

Data Sources

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

1. Parent Input

Black River Career Prep mailed 49 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 0 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 consultants reviewed 13 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. Due to student absences, the team was only able to observe two of the selected students; however, Black River staff were accommodating and flexible, and allowed our team to sit in on Specially Designed Instruction (SDI) for an additional student who was not selected as part of our record review (due to that, we were unable to review the observed student's ETR and IEP prior to this additional observation). Given the structure of Black River Career Prep's dropout prevention and credit recovery program, students utilize an online, self-paced curriculum. Due to this, in-person live instruction is limited to SDI sessions and related services. However, the school's paraprofessional assists students in their independently driven work. In particular, we witnessed one-on-one accommodations being provided by the paraprofessional for testing and in-class work.

4. Staff/Administrative Interviews

On February 23, the Department consultants held six sessions of interviews with four administrators and 13 teachers, school counselors, related services personnel, school psychologists, and paraprofessionals (an additional two staff members were interviewed on February 22). 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:

Throughout the onsite visit at Black River Career Prep, the prioritization of relationship building between staff and students was readily apparent. Students had a strong rapport with administration as well as support and non-instructional staff. Varying staff members displayed a strong understanding of the needs and challenges of individual students, and it was clear that these positive relationships acted as motivation for the students we encountered. Staff members are very willing to be flexible to meet their students' needs, often staying after school hours or offering alternative times to deliver services to students. Due to the unique barriers that coincide with being a dropout prevention and recovery school, it was clear that there were streamlined and efficient policies and procedures in place for attendance intervention.

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 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 action plan has been approved.

CAP Due Date: August 26, 2024

Department Trainings

As part of the Department monitoring process, Black River personnel, as identified by the Department, are typically required to complete the OEC Required Special Education Essentials training modules within the Learning Management System (LMS). In lieu of the online LMS modules, Black River Career Prep opted to do an in-person training that encompassed all identified staff members on April 19, 2024.

Completion of LMS Training Modules Completion Date: April 19, 2024

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: October 22, 2024

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: February 28, 2025

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 SST2 assistance.

For questions regarding the review, please contact: Catherine 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-2	<p><u>OAC 3301-51-06 [Evaluations]</u> Five out of 11 applicable evaluations reviewed, or 45%, did not appropriately document interventions provided to resolve concerns for the child performing below grade-level standards.</p> <p><u>Interviews</u> Administration noted in interview that the school's Multi-Tiered Systems of Support (MTSS) program has been updated and implemented this year. The district has begun an effort to standardize the intervention and data gathering process, however the staff member who was responsible for this new data tracking system has left, which caused a pause in Friday meetings to discuss student data. In the past, staff met on Fridays when students were not in the building to discuss data and student progress, but some staff turnover seems to have affected this. Currently, there is strong tracking of attendance data for MTSS, however instructional data on students is an area for growth. Administration is open to continued work on the MTSS policies, procedures, and practices. Interview sessions also noted that many new staff members have joined the team recently, which has caused a need for new and ongoing Response to Intervention (RTI) and MTSS training.</p> <p><u>Concerns Noted</u> Frequently, the district's ETRs did not contain a summary of interventions implemented to include baseline data, description, intensity, time, and results. In this section, the district must provide a summary of new interventions that have occurred outside of the existing accommodations provided through the current IEP. 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><u>Individual Correction</u> 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> 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. The Department will verify 100% compliance in this area through a review of new records that have been written after all trainings have been completed.</p> <p><u>Opportunities for Improvement</u> Administration noted that they are open to increased onboarding procedures to ensure new staff members are trained on the school's RTI and MTSS policies. A formalized written process for RTI and MTSS will assist with training as new staff members join the Black River team (and consequently ensure that the MTSS system stays in place as the educational agency experiences staffing changes).</p>	<p><input checked="" type="checkbox"/> Yes 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-3	<p>34 CFR 300.501(b) [Parent participation in meetings] and OAC 3301-51-06 (E)(2)(a) [Evaluation procedures].</p> <p>Four out of 11 applicable student records reviewed, or 36%, 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>Several interview sessions relayed that consistent returned communication from families can be difficult. Staff at Black River use alternative methods such as texting and trying to catch parents/guardians during pickup/drop-off, however this does not always guarantee a response back, including times when signed documentation is needed from the parent.</p> <p><u>Concerns Noted</u></p> <p>Several ETRs did not include documentation of a signed Planning Form, nor was there documentation of evidence to involve the parent, such as a PR-01 or OP-9. Two of the four out of compliance ETRs had “agreed via phone/text” on the Planning Form without evidence provided to corroborate this. Participation and required signatures can be documented via email attachment, standard mail, scanned document, photograph of the signature or any other electronic means, and the method of IEP team review and signature collection should be documented in a prior written notice form (PR-01).</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><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. The Department will verify 100% compliance in this area through a review of new records that have been written after all trainings have been completed.</p> <p><u>Opportunities for Improvement</u></p> <p>Black River makes attempts to involve the parent in the ETR planning process, then moves ahead with reevaluations after reasonable attempts to involve the parent. This process could be strengthened in the documentation phase by instituting a written, school-wide policy that includes what steps should be taken when a parent cannot be reached, including documenting attempts to reach the parent through an OP-9, using multiple modes of contact as well as a variety of times for attempted contact. For parents/guardians that are difficult to meet with in-person, or who struggle to use e-signatures, a paper copy of the Planning Form and PR-05 can be sent home to be signed, and the guardian can take a picture of their signature and text or email it back to the school.</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-4	<p>34 CFR 300.300 [Parental Consent] Seven out of 11 applicable student records reviewed, or 64%, did not provide evidence of parental consent obtained prior to evaluation.</p> <p><u>Interviews</u> Because most of the ETRs written at Black River Career Prep are reevaluations, the planning meetings tend to be less formal, occurring over the phone or virtually. Some interviewees stated that it can be challenging getting signed documents back from parents, even when they email PDFs or send physical copies home.</p> <p><u>Concerns Noted</u> Of the records reviewed, the most common reasons for noncompliance in this area were a missing PR-05 or a PR-05 that stated that the parent agreed “per phone” in place of a true signature. Even if agreement is documented on a PR-01, a true signature must be captured on the Parent Consent for Evaluation (PR-05).</p>	<p><u>Individual Correction</u> 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. The evidence may include, prior written notice, parent invitation, communication log, or other documented attempts to obtain parental informed, written consent. 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> The educational agency must submit evidence to the Department of written procedures and practices for obtaining informed parental consent. The Department will verify 100% compliance in this area through a review of new records that have been written after all trainings have been completed.</p> <p><u>Opportunities for Improvement</u> There is an opportunity for Black River Career Prep to strengthen the policies and practices on obtaining written, informed consent for evaluations.</p>	<p><input checked="" type="checkbox"/> Yes 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 300.304(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>Ten out of 11 applicable evaluations reviewed, or 91%, did not provide evidence that the evaluation addresses all areas related to the suspected disability.</p> <p><u>Interviews</u></p> <p>It was noted that the School Psychologist completes a majority of the Part 1s (note: a high number of selected records were transfer students, and thus the ETRs were completed by neighboring school districts). The Speech Language Pathologist writes her own Part 1s, and the in-person Intervention Specialist will conduct observations. The Intervention Specialist meets with the School Psychologist every Monday to discuss students who are being evaluated, and the Intervention Specialist feels that her input is well-received and considered.</p> <p><u>Concerns Noted</u></p> <p>From the records reviewed, it was noted that the Planning Forms did not accurately reflect the Part 1s completed for the evaluation for at least one of the following reasons:</p> <ul style="list-style-type: none"> • Evaluations marked on the Planning Form were not included in a corresponding Part 1 • The Data for Review status did not match the date of the assessment (for example, the Planning form listed an area as Sufficient Data Available, but the Part 1 had evidence of new testing) • The Part 1 was missing required components (such as a dated signature from the assessor, or the Implications for Instruction section). <p>Several records did not include an observation. In the Part 2 Summary of Observation Data section of these ETRs, there was a statement explaining that an observation was not needed due to the suspected disability category. Per the 2018 memo regarding observations for reevaluations, all initial and reevaluations (for any and all suspected disabilities) must include an observation on the planning form. The observation should be marked as either “sufficient data available” or “additional testing needed.”</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. The Department will verify 100% compliance in this area through a review of new records that have been written after all trainings have been completed.</p> <p><u>Opportunities for Improvement</u></p> <p>The newly developed Internal Monitoring Team can act as a resource for staff members who are in the ETR planning process. This will help ensure that the planning form aligns with who will be completing the ETR Part 1s before the planning meeting is held with the parent (and before parent signatures are obtained on the PR-05 and planning form).</p> <p>The Department recommends using consistent language between the planning form and the Part 1s when labeling the area of assessment. If the assessment title is the same on both the Part 1 and the planning form, it will make it easier for the Internal Monitoring Team, as well as the creator of the ETR, to ensure all needed Part 1s have been included in the drafted document.</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>Six out of 11 applicable evaluations reviewed, or 55%, did not show evidence of clearly stating the summary of assessment results.</p> <p><u>Interviews</u></p> <p>The School Psychologist completes a majority of the Part 1s as well as transfers those details to the Part 2 Summary (note: a high number of selected records were transfer students, and thus the ETRs were completed by neighboring school districts). The Speech Language Pathologist transfers her own Part 1 information to the Part 2 Summary.</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 educational agency must submit evidence to the Department of written procedures and practices regarding summary of data and assessment results. The Department will verify 100% compliance in this area through a review of new records that have been written after all trainings have been completed.</p> <p><u>Opportunities for Improvement</u></p> <p>Black River Career Prep must develop an internal monitoring process which contains procedures to ensure:</p> <ul style="list-style-type: none"> • Active team participation in the ETR process. • Assessments identified on the planning form are being completed and represented in a Part 1 and are summarized within the Part 2 in parent-friendly language. <p>Professional development should be provided to all identified staff members (those marked as LMS Module participants) regarding participation and completion of required ETR forms, thus allowing them to be an active member in the development of the ETR.</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-7	<p>34 CFR 300.306(c) [Procedures for determining eligibility and educational need]</p> <p>Four out of 11 applicable evaluation team reports, or 36%, reviewed did not contain a clear and succinct description of educational needs.</p> <p><u>Interviews</u></p> <p>It was noted that the School Psychologist completes a majority of the Part 1s as well as transfer those details to the Part 2 Summary (note: a high number of selected records were transfer students, and thus the ETRs were completed by neighboring school districts). The Speech Language Pathologist writes her own Part 1s and transfers this to the Part 2 herself.</p> <p><u>Concerns Noted</u></p> <p>Educational Needs were sometimes generic in nature and did not address the child’s individualized needs, making it more difficult for the IEP team to create specific and measurable goals related to the individual student’s areas of need. Sometimes educational needs were stated in a Part 1 but were not included in the Part 2 summary.</p>	<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 educational agency must submit evidence to the Department of written procedures and practices regarding description of educational needs. The Department will verify 100% compliance in this area through a review of new records that have been written after all trainings have been completed.</p> <p><u>Opportunities for Improvement</u></p> <p>It would be beneficial to provide professional development on how to write purposeful educational needs to all staff members who might be requested to complete a Part 1 is recommended.</p>	<p><input checked="" type="checkbox"/> Yes</p> <p>This finding needs to be addressed in a Corrective Action Plan.</p>
CF-8	<p>34 CFR 300.306(c) [Procedures for determining eligibility and educational need]</p> <p>Two out of 11 applicable evaluation team reports reviewed, or 18%, did not contain specific implications for instruction.</p> <p><u>Interviews</u></p> <p>It was noted that the School Psychologist completes a majority of the Part 1s as well as transfer those details to the Part 2 Summary (note: a high number of selected records were transfer students, and thus the ETRs were completed by neighboring school districts). The Speech Language Pathologist writes her own Part 1s and transfers this to the Part 2 herself.</p> <p><u>Concerns Noted</u></p> <p>In several ETRs reviewed, it was found that specific implications from Part 1s were not transferred over to the Part 2 summary of implications for instruction.</p>	<p><u>Individual Correction</u></p> <p>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.</p> <p><u>Systemic Correction</u></p> <p>It is recommended that the educational agency revise procedures and practices regarding implications for instruction. The Department will verify 100% compliance in this area through a review of new records that have been written after all trainings have been completed.</p> <p><u>Opportunities for Improvement</u></p> <p>Providing professional development on how to write purposeful implications for instruction to all staff members, who might be requested to complete a Part 1 is recommended.</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-9	<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 11 applicable evaluations reviewed, or 27%, 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>Interviewers noted that they will reach out to parents often via text to confirm their attendance at virtual or in-person meetings because this often yields a higher success rate of getting a response back; however, it frequently happens that even if the parent confirms they will be there, they may still miss the meeting.</p> <p>It was also noted in interviews that many ETR and IEP meetings happen during the school day, making it difficult for general education teachers to attend.</p> <p><u>Concerns Noted</u></p> <p>The three records noted were noncompliant due to the lack of a true signature being captured, and instead a phrase such as “agreed via Google Meet” was written in place of the signature. While this is minimally compliant for reevaluations if there is supporting documentation within a PR-01 or PR-02, these three records did not have either of these corresponding documents acting as evidence of the virtual nature of the meeting.</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>It is recommended that the educational agency revise procedures and practices regarding the eligibility determination process. The Department will verify 100% compliance in this area through a review of new records that have been written after all trainings have been completed.</p> <p><u>Opportunities for Improvement</u></p> <p>It is recommended that the educational agency review and revise written procedures and practices regarding protocols for collecting a true signature, including for virtual and phone conferences. Consider including a policy involving the use of an OP-9 to document attempts to obtain a digital or in-person signature.</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-10	<p>OAC 3301-51-01 (B)(10) [Definitions] and 3301-51-06 [Evaluations] Four out of 11 applicable evaluations reviewed, or 36%, did not provide a justification for the eligibility determination decision.</p> <p><u>Interviews</u> It was noted that the School Psychologist does an excellent job remaining unbiased during the evaluation process and that there is no predetermination occurring.</p> <p><u>Concerns Noted</u> The instances of noncompliance in this section were due to:</p> <ul style="list-style-type: none"> • More than one suspected disability was identified on the Planning Form; however, the Eligibility Statement did not explain how the child did not meet the criteria for the disability that was <i>not</i> selected. • 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> 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> The educational agency must submit evidence to the Department of written procedures and practices regarding the eligibility determination decision. The Department will verify 100% compliance in this area through a review of new records that have been written after all trainings have been completed.</p> <p><u>Opportunities for Improvement</u> The newly developed Internal Monitoring Team will be trained by the Supports and Monitoring Team on all areas of compliance for the ETR and IEP, which will include how to write a compliant Eligibility Determination. The Internal Monitoring Team will be able to disseminate this information through proactive record corrections prior to the ETR meeting to ensure all required elements of CF-10 are included before the document is signed.</p>	<input checked="" type="checkbox"/> Yes This finding needs to be addressed in a Corrective Action Plan.

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>Eleven (11) out of 13 IEPs reviewed, or 85%, 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 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>Interviews</p> <p>It was noted that certain OhioMeansJobs activities are used for all students at Black River to help them prepare for life after high school. For the transition assessment, the Intervention Specialist also uses OhioMeansJobs activities as well as conversations/interviews with students; in addition, she uses the IEP meeting time (when the student is in attendance) to “dig deeper” to gain more detailed information.</p>	<p>Individual Correction</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>Systemic Correction</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 have been written after all trainings have been completed.</p> <p>Opportunities for Improvement</p> <p>Ohio Means Jobs is a resource for all students at Black River Career Prep, however it was also noted frequently as a transition service within Section 5 of the IEP. It is recommended that the district review transition services to ensure that they are individualized and different from what all other students receive.</p> <p>It is recommended training 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>The Internal Monitoring Team and review system will promote compliance in this area.</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>Black River Career Prep is currently researching different career and technology educational pathways that could be implemented in the future at the school. Administration is collecting data on what career pathways are of higher interest to students, with the intention being to either hiring new staff or train existing staff members to then teach accredited career programs in these areas.</p> <p>Concerns Noted Some common themes noted when reviewing submitted records were:</p> <ol style="list-style-type: none"> 1. Goals: If an independent living goal was not included, there was no statement (either in the Profile or in Section 5) explaining why no independent living goal was needed for the individual student. Several integrated employment goals centered around part-time work the student will be doing while earning a degree instead of the end-goal career they are interested in. 2. Transition services: Most transition services started with the phrase, "with assistance." This is minimally compliant; however, it is recommended to phrase transition services to fully describe what the staff member will be doing (how exactly will they assist?). 3. Courses of Study must include either Ohio Learning Standards or Ohio Learning Standards Extended. In this box, there was typically language that did not include the above two options, but instead used "Ohio Common Core" language. 		

Record Review Item	Evidence of Findings	Evidence of Correction/Recommendations	Must be Addressed in CAP
DS-2	<p>34 CFR 300.320(a)(1) [Definition of individualized education program]</p> <p>Twelve (12) out of 13 IEPs reviewed, or 92%, did not contain Present Levels of Academic Achievement and Functional Performance (PLOP) that addressed the needs of the student.</p> <p>Interviews</p> <p>There are three total Intervention Specialists working for Black River Career Prep. One Intervention Specialist is in charge of writing all IEPs for students, while the other two Intervention Specialists (one in-person and one virtual) deliver services to the students. The virtual Intervention Specialist who writes the IEPs also works for other schools within the FusionEd system. The Intervention Specialist who writes the IEPs collects surveys from teachers and looks over testing data when determining annual IEP goals for students, and subsequently the PLOPs.</p> <p>Concerns Noted</p> <p>Frequently, the PLOP was missing a comparison statement to expected grade-level standard or age-appropriate performance of same age peers.</p> <p>Occasionally, the data reported in the PLOP did not include baseline data that was in alignment with the skill, condition, and mastery criteria of the annual goal statement. For example, in some instances, the baseline data was recent testing data, such as STAR reading scores, instead of the student's current level of accuracy with the specific skill that was focused on in the goal.</p>	<p>Individual Correction</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 grade-level 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 directly relates to the goal measurement. <p>Systemic Correction</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 have been written after all trainings have been completed.</p> <p>Opportunities for Improvement</p> <p>There is an opportunity for professional development and/or targeted technical assistance in developing PLOP that clearly address the needs of the student.</p> <p>The Internal Monitoring Team and review system will promote compliance in this area.</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
DS-3	<p>34 CFR 300.320(a)(2)(i) [Definition of individualized education program]</p> <p>Seven out of 13 IEPs reviewed, or 54%, did not contain measurable annual goals.</p> <p><u>Interviews</u></p> <p>To collect data needed to develop appropriate goals and PLOP data, the Intervention Specialist who writes the school's IEPs uses a combination of notes and data collected from the other two Intervention Specialists, virtual check-ins with students, and Quick Access data that shows students' current performance.</p> <p><u>Concerns Noted</u></p> <p>Measurable goals in the IEPs reviewed were often missing one or more required elements (described under "Individual Correction"). Several goals were marked as noncompliant due to two or more skills being listed in the goal statement (goals can only focus on one skill).</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 have been written after all trainings have been completed.</p> <p><u>Opportunities for Improvement</u></p> <p>There is an opportunity for professional development and/or targeted technical assistance in developing compliant measurable goals.</p> <p>The Internal Monitoring Team and review system will promote compliance in this area.</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
DS-4	<p>34 CFR 300.320(a)(2)(i) [Definition of individualized education program]</p> <p>Three out of 11 applicable IEPs reviewed, or 27%, did not contain annual goals that address the child’s academic area(s) of need.</p> <p>Concerns Noted</p> <p>In the three IEPs found noncompliant in this area, there were academic needs addressed in the ETR that were not addressed in the IEP. These needs can be addressed as a goal, a related service, an accommodation, or as a statement in the Profile indicating that the team has prioritized other needs or found that it is not an area of concern at this time.</p>	<p>Individual Correction</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, and a statement of those priorities is provided in the Profile of the IEP.</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 addressing identified academic needs. The Department will verify 100% compliance in this area through a review of new records that have been written after all trainings have been completed.</p> <p>Opportunities for Improvement</p> <p>An internal monitoring and review system will promote compliance in this area.</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 contained annual goals that address the child’s functional area(s) of need.</p>	<p>Individual Correction</p> <p>N/A</p> <p>Systemic Correction</p> <p>N/A</p>	<p><input checked="" type="checkbox"/> N/A</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>Twelve (12) out of 13 IEPs reviewed, or 92%, did not contain a statement of specially designed instruction including related services that addresses the individual needs of the child and supports the annual goals.</p> <p><u>Interviews</u></p> <p>The Intervention Specialists have access to Google Classroom resources that can be used during SDI instruction. These Drives include differentiated and modified work that connects to course requirements for students' APEX classes. Since there are no modifications available for APEX exams, the Intervention Specialists provide this scaffolded work as a way to better prepare students for these final exams, with the intention being to use these materials as a bridge until the student is able to complete grade-level work.</p> <p><u>Concerns Noted</u></p> <p>Frequently, the SDI statement listed both small group and one-on-one instruction in the same SDI statement. One-on-one, small group, and whole group instruction must be separated out into different SDI statements to make clear how many minutes of each type of instruction will be occurring.</p> <p>Similarly, in several IEPs, two staff members were listed as the person responsible for the delivery of the SDI. Only one staff member should be listed as the SDI provider, and other staff (especially the general education teacher) should be listed under Support for School Personnel if they are assisting in the delivery of SDI minutes.</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 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 have been written after all trainings have been completed.</p> <p><u>Opportunities for Improvement</u></p> <p>It is recommended that professional development in the area of writing compliant SDI be provided by the State Support Team.</p> <p>An internal monitoring and review system will promote compliance in this area.</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
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>Twelve (12) out of 13 IEPs reviewed, or 92%, did not indicate the specific location where the specially designed instruction will be provided.</p> <p>Interviews</p> <p>There is currently one room available for the in-person and virtual Intervention Specialist to use for SDI delivery. Because of that, there are times when virtual and in-person SDI sessions overlap. Frequently, the in-person Intervention Specialist needs to help students who are in her room meeting with the virtual Intervention Specialist (trouble-shoot computer problems, support instruction, etc.).</p> <p>Concerns Noted</p> <p>The most frequently seen reason for noncompliance in this area was the use of multiple locations listed for each SDI session (“General education classroom, resource room as well as virtual session”). If students are at school attending virtual SDI, this can be written to clarify the virtual service being delivered by phrasing such as, “virtual session to be held in the resource room setting.” This will clearly describe the setting without implying multiple locations.</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>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 will occur. The Department will verify 100% compliance in this area through a review of new records that have been written after all trainings have been completed.</p> <p>Opportunities for Improvement</p> <p>Consider if there are opportunities for alternative spaces and support for virtual SDI sessions (for example, virtual SDI supported by the Paraprofessional in a smaller room). If this change is possible and sustainable, it may benefit efficient utilization of the in-person Intervention Specialist.</p>	<p><input checked="" type="checkbox"/> Yes</p> <p>This finding needs 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>One out of 13 IEPs reviewed, or 8%, did not indicate the amount of time and frequency of the specially designed instruction.</p> <p>Interviews</p> <p>A new SDI tracking spreadsheet was created and implemented this year. It appears to be user friendly and allows successful tracking of SDI minutes, as well as student progress.</p>	<p>Individual Correction</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.</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 amount and frequency of specially designed instruction to be provided. The Department will verify 100% compliance in this area through</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 Correction/Recommendations	Must be Addressed in CAP
	<p>Concerns Noted</p> <p>The one record found noncompliant in this area did not have an amount of time and frequency listed for the related service (the rest of the SDI did have time and frequency listed).</p>	<p>a review of new records that have been written after all trainings have been completed.</p> <p>Opportunities for Improvement</p> <p>Consider how the newly implemented SDI and progress data tracking system (Google Sheet and linked Google Survey) can be incorporated into new staff onboarding procedures</p>	
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>There were no applicable records reviewed that identify assistive technology to enable the child to be involved and make progress in the general education curriculum.</p>	<p>Individual Correction</p> <p>NA</p> <p>Systemic Correction</p> <p>NA</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>Twelve (12) out of 13 IEPs reviewed, or 92%, did not identify accommodations provided to enable the child to be involved and make progress in the general education curriculum.</p> <p>Interviews</p> <p>Staff members at Black River Career Prep have positive relationships with their colleagues, making informal collaboration easy. General education teachers noted that they feel welcomed going to the in-person Intervention Specialist to ask questions, or to get feedback on how to assist students on her caseload. The paraprofessional in the building travels between classrooms throughout the day to provide accommodations for students such as read aloud, small group testing, and repeated or clarified instructions. Administration is looking into spacing options to give the paraprofessional a smaller room where she can consistently pull students to assist them with their academic work in a small group environment.</p>	<p>Individual Correction</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>Systemic Correction</p> <p>The educational agency must submit evidence to the Department of written procedures and practices regarding accommodations. The Department will verify 100% compliance in this area through a review of new records that have been written after all trainings have been completed.</p> <p>Opportunities for Improvement</p> <p>Training from the State Support Team as well as an internal monitoring review system will help to promote compliance in the area of accommodations.</p>	<input checked="" type="checkbox"/> 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><u>Concerns Noted</u></p> <p>Accommodations listed in Section 7 were frequently missing the condition and extent (for example, for extended time on assignments, clarify the length of the extension, such as 100%, “up to 10 school days,” or “twice the time of general peers”).</p> <p>It was occasionally noted that the Accommodations section was missing accommodations mentioned in the implications for instruction that were found in the ETR. Implications can be addressed through Section 7, or in a statement that indicates the team has prioritized other needs or found that it is not an area of concern at this time.</p>		
DS-11	<p><i>34 CFR 300.320(a)(4) [Definition of individualized education program]</i> <i>OAC 3301-51-07 (H)(1)(e) [Definition of IEP]</i></p> <p>Two out of four applicable IEPs reviewed, or 50%, did not identify modifications to enable the child to be involved and make progress in the general education curriculum.</p> <p><u>Interviews</u></p> <p>Staff members noted that in some cases, students are behind grade level prior to enrolling in Black River, so staff members, especially the Intervention Specialists, use differentiated materials to help students get closer to academic performance that is on grade level. Since APEX courses must be passed by taking non-modified online tests, there is an understanding that while modified work/instruction can be used to assist the student, they are working towards grade-level content.</p> <p><u>Concerns Noted</u></p> <p>In reviewing the records of students receiving modifications, the two identified as having noncompliant modification descriptions did not specify the extent of the modification regarding content and instructional level (ex: the statement said “modified math curriculum” without describing the extent of the modification, including instructional level).</p>	<p><u>Individual Correction</u></p> <p>The educational agency must reconvene the teams of the IEPs identified as noncompliant to review the modifications that would alter the amount or complexity of grade-level materials and would enable the child to be involved and make progress in the general education curriculum and include them in 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 modifications. The Department will verify 100% compliance in this area through a review of new records that have been written after all trainings have been completed.</p> <p><u>Opportunities for Improvement</u></p> <p>Training from the State Support Team as well as an internal monitoring review system will help to promote compliance in the area of modifications.</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
DS-12	<p>34 CFR 300.320(a)(4) [Definition of individualized education program] OAC 3301-51-07 (H)(1)(e) [Definition of IEP] One out of one applicable IEPs 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>Concerns Noted Only one IEP identified a service under Support for School Personnel in Section 7. In this instance, what was listed did not meet the requirement of describing the specific adult-to-adult service or consultation that would be occurring. Under Support for School Personnel, there must be a description of what support will be provided, who will receive and who will deliver the support (example: "The intervention specialist will consult with the general education teacher to ensure a comprehensive understanding of the student's IEP, including accommodations and relevant academic goals").</p>	<p>Individual Correction 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>Systemic Correction 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 have been written after all trainings have been completed.</p> <p>Opportunities for Improvement The Internal Monitoring Training provided by the Supports and Monitoring Team will provide guidance and examples on compliantly written statements for this section of the IEP.</p>	<p><input checked="" type="checkbox"/> Yes This finding needs to be addressed in a Corrective Action Plan.</p>
DS-13	<p>OAC 3301-51-07 (H)(1)(h)(ii) [Definition of IEP] There were no student records reviewed that had a need for 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>Individual Correction NA</p> <p>Systemic Correction NA</p>	<p><input checked="" type="checkbox"/> NA</p>
DS-14	<p>OAC 3301-51-07(L)(2) [Development, review and revision of IEP] Eight out of 10 applicable student records reviewed, or 80%, did not show evidence of progress reporting data collected and analyzed to monitor performance on each goal.</p> <p>Interviews While on site, the Intervention Specialist shared the SDI tracking system that is in place at Black River. This comprehensive Google Sheets document included minutes tracking as well as progress notes and student grades. The SDI tracking system utilized a linked Google Survey, where Intervention Specialists document</p>	<p>Individual Correction None</p> <p>Systemic Correction The educational agency must submit evidence to the Department of written procedures and practices regarding measurable annual goals and services consistent with progress made. The Department will verify 100% compliance in this area through a review of new records that have been written after all trainings have been completed.</p>	<p><input checked="" type="checkbox"/> Yes 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>when they worked with students, whether or not the student refused services, and both quantitative and qualitative data on the SDI session.</p> <p>Concerns Noted</p> <p>While many of the Progress Reports reviewed had strong qualitative data that was in parent-friendly language, it was consistently seen that Progress Reports were missing current quantitative data that was in alignment with the skill/behavior, condition, and mastery criteria described in the annual goal statement.</p>	<p>Opportunities for Improvement</p> <p>The comprehensive SDI tracking system currently in place will be an asset at Black River Career Prep. In addition to documenting when students refuse services, it is recommended to also document in the future when students are absent during SDI sessions. Given the barriers to attendance experienced at Black River, this documentation can be useful in instances where Progress Reports have insufficient data due to the inability to meet with students consistently.</p> <p>Training from the State Support Team as well as an internal monitoring review system will promote compliance in the area of progress monitoring.</p>	
DS-15	<p>OAC 3301-51-07(L) [Development, review and revision of IEP]</p> <p>Three out of four applicable IEPs reviewed, or 75%, did not show evidence that revisions were made based on data indicating changes in student needs or abilities.</p> <p>Concerns Noted</p> <p>In the three records found out of compliance in this area, it was due to the ETR being written and signed after the IEP. In these cases, the IEP must be reviewed to ensure all services are still appropriate for meeting the student's needs. Either an amendment should be done for any areas that need to be changed to better align with the new ETR's needs, or a statement should be added to the Profile documenting that the services outline in the existing IEP are still appropriate under the new ETR findings.</p>	<p>Individual Correction</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>Systemic Correction</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. The Department will verify 100% compliance in this area through a review of new records that have been written after all trainings have been completed.</p> <p>Opportunities for Improvement</p> <p>Consider how a review of the existing IEP can be incorporated into ETR meetings in instances like this where the IEP date is recent (and therefore a renewal will not be occurring any time soon). While the parent is in the meeting (either in-person or virtual), any necessary amendments can be made and signed off by the team. Consider this when revising policies, procedures, and practices surrounding IEP revisions.</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
DS-16	<p>34 CFR 300.321(5) [IEP team] OAC 3301-51-07(I) [IEP team]</p> <p>All IEPs reviewed indicated that the IEP Team included a group of qualified professionals.</p> <p>Interviews</p> <p>Since the Intervention Specialist who writes the IEPs is virtual, most of the IEP meetings are held virtually, after which the Intervention Specialist sends home a PR-01 and a signed copy of the IEP.</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>

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>Seven out of 13 IEPs reviewed, or 54%, 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></p> <p>SDI is most commonly provided in the resource room by either the in-person or virtual Intervention Specialist. Intervention Staff at Black River provide flexibility in terms of when they deliver SDI based on student needs. The in-person Intervention Specialist noted that she will stay after school to accommodate students who have an easier time finding transportation later in the day, as well as on Fridays when students are not scheduled to be the building, which benefits students who struggle within a busier school environment.</p> <p>Staff interviews noted that a new bell schedule was implemented at the start of the 2023-2024 school year (previously students remained in one room throughout the entire day). Staff has experienced inconsistency with the enforcement of class transitions. Students are expected to follow certain protocols before being allowed to stay in a specific room after the bell has rung (they are supposed to check in with their next teacher and receive a pass to return to the room they'd prefer to stay in), however students do not always follow these rules and will refuse to change classrooms or get a pass. Staff noted that they are not aware of consistent consequences occurring for students who refuse to follow the bell schedule protocols, which results in staff feeling unable to enforce the bell schedule policy. It was also noted that students being in their unassigned rooms can cause discrepancies with attendance reporting.</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. The Department will verify 100% compliance in this area through a review of new records that have been written after all trainings have been completed.</p> <p><u>Opportunities for Improvement</u></p> <p>Training and an IEP review process by the Internal Monitoring Team will promote compliance in this area.</p> <p>To ensure student access to the least restrictive environment in all content areas, Black River would benefit from the continued implementation of the universal bell schedule with classes changes to provide consistent access to a content specialist for each area of online coursework.</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>Concerns Noted</u></p> <p>In many cases, the justification statement outlined what the services outside of the general education setting will look like, but it did not provide a justification as to why the student, based on their individual needs, will need to be removed from the general education environment. The LRE statement should reflect the consideration and attempts to deliver all services in the general classroom, and why this was not possible for this individual student.</p>		

Additional Considerations and Opportunities for Improvement:

- Interview sessions with administration revealed that they were amenable to revising and improving the school's PBIS policies, procedures, and practices. The school received some SST support over the 2023 summer to help roll out a newer PBIS model, so the implementation of this system is still ongoing. Several staff interviews noted the need for an increase in consistently upheld expectations for student behavior, which should be considered when leadership is revising and continuing to grow the PBIS program at Black River Career Prep. In interview sessions, ideas discussed included creating a behavior matrix to ensure both staff and students understand what consequences will result from varying unwanted behaviors, as well as what the tiered response will be for continued infractions. This way consistent responses from staff and administration can occur with fidelity, which will in turn aid students in understanding building-wide expectations. Tools such as a behavior matrix developed as a school-wide team will help to communicate clearly to students what is expected from the entire community, both in terms of positive behaviors to encourage as well as what negative behaviors to discourage (for example, if consistent consequences are upheld for students who do not follow the bell schedule policy, the expectation of changing rooms or getting a pass will become clearer to all students). The staff of Black River Career Prep already have strong, positive relationships with their student body, so by maintaining this supportive culture while also increasing the expectations surrounding behavior, it is believed that Black River could have a very strong PBIS program.
- Interview sessions noted inconsistent support from the contracted resource officers. Since these are contracted staff members, the IDEA Monitoring Team is aware that Black River may be limited in terms of its response, however we encourage written policies outlining daily responsibilities to aid in better utilization of this staff position. If it is possible to have contracted staff members attend professional development, we encourage the resource officers to partake in any training that affects building-wide policy implementation, such as PBIS training, CPI, trauma-informed practices, etc.
- Interview sessions noted multiple procedures for taking attendance that could potentially be streamlined. There is an iPad/tablet sign-in when students first arrive, as well as a paper sign-in at students' homeroom. It appears that occasionally, students are signing in on one but not the other (most frequently, it seems that students are forgetting to sign in at homeroom, or do not go to their homeroom at the start of the day at all, and therefore do not sign in). It is recommended to look over the current policies and procedures for recording attendance throughout the day to see if there are ways to increase the efficacy and efficiency of attendance data gathering. To ensure building policies continue to align with the data needs of the sponsor, it is recommended that representatives from Career Prep Schools be involved in any revisions of this policy.
- Black River Career Prep is currently completing an Improvement Plan through the Data Team for Indicator 1 and 2 findings. The long-term goal of this plan is to improve graduation rates by 5% and reduce the dropout rate by 5%, while the short-term goal is to "employ PBIS and student engagement and retention activities to increase the graduation rate and decrease the dropout rate." The Improvement Plan activities are to implement a quarterly student check-in to review progress toward graduation as well as quarterly training and assistance on PBIS implementation with SST2. Continuation of this collaboration with SST2 is highly recommended.
- As noted in several sections of the Child Find portion of this report, Black River Career Prep has many students who transfer in with ETRs and IEPs that have been written by another educational agency. It is recommended that the Internal Monitoring Team considers incorporating a systematic review process for transfer ETRs and IEPs when designing their own internal policies, procedures, and practices.