

**Buckeye Central Local School District**  
**IRN: 046508****Ohio the Department of Education, Office for Exceptional Children**  
**2019-2020 IDEA Monitoring Review Summary Report****Introduction**

The Ohio the Department of Education's Office for Exceptional Children would like to extend appreciation to the Buckeye Central Local School District 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 non-compliant.

Systemic Corrections refers to non-compliance 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 October 19, 20 and 23, 2020 as part of its general supervision requirements under the Individuals with Disabilities Education Act (IDEA) and Am. Sub. H.B.1.

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. Public Parent Meeting and Written Comments**

Buckeye Central Local School District emailed 150 of the Department approved letters to all families with students with disabilities in the educational agency. The Department provided the educational agency with a public meeting announcement to post on the district website. Public parent meeting dates for all educational agencies selected for onsite reviews are also posted on the Department website.

On October 19, 2020, the Department consultants held a public meeting for parents and other interested parties. Two (2) parents and family members and two (2) State Support Team (SST) Region 7

representatives attended the public meeting. Attendees could speak to the Department representatives publicly in the meeting, speak to the Department representatives individually, provide written comments or both. Two (2) attendees made comments during the public meeting. The Department received zero (0) written comments.

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

## 2. Pre-Onsite Data Analysis

The Department conducted a comprehensive review which included district, building and grade level data; Special Education Performance 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 nineteen (19) records of school age students with disabilities. The Department consultants selected records of students with disabilities from a variety of disability categories and ages. Eight (8) student records were selected for IEP verification in the classroom setting.

## 4. Staff/Administrative Interviews

On October 19 and 23, 2020, the Department consultants held six (6) sessions of interviews with six (6) administrators and twenty-one (21) teachers, related services personnel, school psychologists and paraprofessionals. The Department interviews focused on the following review areas: Child Find, Delivery of Services, Least Restrictive Environment (LRE), IEP alignment and Discipline.

### **Strengths/Commendations:**

- General education teachers expressed positive experiences working collaboratively with intervention specialists and related service providers to meet the individualized needs of students with special education services and supports.
- Several groups of staff members articulated that there is strong support and response from special education leadership with the provision of services and supports.
- There is coordination at the elementary level in transitioning students from grade to grade to ensure consistency with services.
- Training provided to staff on Universal Design for Learning (UDL) is being referenced and utilized by some staff members.
- Related services at several levels are providing services in general education courses to support students accessing the general curriculum in the least restrictive environment as appropriate for individual students.
- It was evident that the staff interviewed were passionate about supporting all students and providing services to help students 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 Becky Krall at [becky.krall@education.ohio.gov](mailto:becky.krall@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: March 30, 2021***

### **Department Trainings**

As part of the Department monitoring process, Buckeye Central Local School District personnel, as identified by the Department, are required to complete the Special Education Essentials 2019-2020 training modules within the Learning Management System (LMS). The Department will provide specific instructions on completing these training modules during the Summary Report presentation. Participants must achieve a 75% or more on each quiz. Participants who do not achieve at least 75% will be contacted by the State Support Team (SST) for additional training.

***Completion of LMS Training Modules Due Date: March 30, 2021***

### **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 are provided in a separate report.

***Individual Correction Due Date: May 13, 2021***

### **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: November 19, 2021***

Once the educational agency has completed all action plan activities, the educational agency will use the Department's monitoring process to create and implement a Strategic Improvement Plan with the Department and SST assistance.

For questions regarding the review, please contact: Becky Krall, the Department's IDEA Monitoring Contact, at 614-595-2203, toll-free at (877) 644-6338, or by e-mail at [becky.krall@education.ohio.gov](mailto:becky.krall@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><b>34 CFR 300.305(a) [Review of Existing evaluation data] and OAC 3301-51-11 (c)(1)(a) [Preschool children eligible for special education]</b></p> <p>Preschool records were not reviewed.</p>	<p><u>Individual Correction</u></p> <p>NA</p> <p><u>Systemic Correction</u></p> <p>NA</p> <p><u>Opportunities for Improvement</u></p> <p>NA</p>	<input checked="" type="checkbox"/> NA
	Interviews/Public Comments			
	Concerns Noted			
CF-2	Record Review	<p><b>OAC 3301-51-06 [Evaluations]</b></p> <p>Eighteen (18) out of 19, or 95% of evaluations reviewed 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>Buckeye Central Local would benefit from reviewing and revising their RTI and MTSS processes. Once revised, the district 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.</p>	<input checked="" type="checkbox"/> Yes
	Interviews/Public Comments	Through interviews, it was noted that the Response to Intervention (RTI) and Multi-Tiered System of Support (MTSS) process for the district is not clearly known across all grade levels. It was communicated that there is uncertainty in how interventions are to be reported in the evaluation team report.		The educational agency needs to address this finding in a Corrective Action Plan.
	Concerns Noted	There does not appear to be consistent knowledge of a common process across the district for referring a student for intervention supports. Additionally, there does not appear to be consistent knowledge on how to select and monitor interventions and how this information may eventually be included into a special education evaluation.		

Record Review Item	Evidence of Findings		Evidence of Corrections/Recommendations	Must be addressed in CAP
			It is recommended that Buckeye Central Local develop a procedure of checks and balances to ensure interventions that are being provided to students are correctly documented within the ETR as well as in the Part 2 Summary of Interventions.	
CF-3	Record Review	<p><b>34 CFR 300.501(b) [Parent participation in meetings] and OAC 3301-51-06 (E)(2)(a) [Evaluation procedures].</b></p> <p>Two (2) out of 19, or 11% of student records did not show evidence that the parent was afforded the opportunity to participate in the evaluation team planning meeting.</p>	<p><u>Individual Correction</u></p> <p>The educational agency must provide evidence that the parent was involved or provided the opportunity to participate in the evaluation planning process.</p> <p>The evidence may include evaluation planning form, prior written notice, parent invitation, referral form or communication log.</p> <p>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 meeting 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><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			

Record Review Item	Evidence of Findings		Evidence of Corrections/Recommendations	Must be addressed in CAP
CF-4	Record Review	<p><b>34 CFR 300.300 [Parental Consent]</b>            Fourteen (14) out of 19, or 74% of student records reviewed did not provide evidence of parental consent obtained prior to new testing.</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.</p>	<p><input checked="" type="checkbox"/> Yes            The educational agency needs to address this finding in a Corrective Action Plan.</p>
	Interviews/Public Comments			
	Concerns Noted	<p>There appears to be unclear procedures on how to obtain written, parental consent for evaluations as evidenced through the record reviews. When verifying parental consent through the PR-05, three (3) records did not have dates, two (2) records were left blank, two (2) records only contained verbal permission by phone, seven (7) records had a gap of three to eleven months between obtaining consent and the Evaluation Team Report meeting, and three (3) records had additional testing completed that was not included on the planning form and would indicate that parent(s) did not provide consent for those assessments.</p>	<p>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 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>            It is recommended that Buckeye Central Local review its special education policies and procedures to ensure that the practice of obtaining written, parental consent is consistently being implemented correctly. This would include ensuring that parent/guardian written signatures include a date to confirm the actual date of consent along with completing assessments as written on the planning form with which the parent/guardian had the opportunity to participate.</p>	

Record Review Item	Evidence of Findings		Evidence of Corrections/Recommendations	Must be addressed in CAP
CF-5	Record Review	<p><b>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]</b></p> <p>Eighteen (18) out of 19, or 95% of evaluations reviewed 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 Buckeye Central Local develop an internal practice to monitor the evaluations 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 Reports 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>Interviews indicated inconsistent knowledge from staff on what their role and purpose was for being asked to complete a Part 1 evaluation of the ETR.</p>		
	Concerns Noted	<p>Almost every ETR had concerns with assessments indicated on the planning form not being included in Part 1 of the ETR. All assessments and data listed for evaluation on the planning form, and agreed upon by the parent/guardian, must appear in Part 1 Individual Evaluator’s Assessment Report. Sometimes evaluations were listed as “sufficient data available” on the planning form yet new evaluations were completed and vice versa.</p>		

Record Review Item	Evidence of Findings		Evidence of Corrections/Recommendations	Must be addressed in CAP
CF-6	Record Review	<p><b>34 CFR 300.306(c) [Procedures for determining eligibility and educational need]</b></p> <p>Thirteen (13) out of 19, or 68% of evaluations reviewed did not show evidence of clearly stating the summary of assessment results.</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 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.</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>Information included in the summary was often copied and pasted from Part 1 Individual Evaluator's Assessments 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.</p>		
CF-7	Record Review	<p><b>34 CFR 300.306(c) [Procedures for determining eligibility and educational need]</b></p> <p>Seven (7) out of 19, or 37% of evaluation team reports reviewed did not contain a clear and succinct description of educational needs.</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.</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 several records, educational needs were stated in Part 1 but were not included in the Part 2 summary. Educational needs should be written in a way that allows for them to be used by the IEP team to develop meaningful and actionable goals and services.</p>		

Record Review Item	Evidence of Findings		Evidence of Corrections/Recommendations	Must be addressed in CAP
CF-8	Record Review	<p><b>34 CFR 300.306(c) [Procedures for determining eligibility and educational need]</b></p> <p>Four (4) out of 19, or 21% of evaluation team reports reviewed did not contain specific 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>The educational agency must submit evidence to the Department of written procedures and practices regarding implications for instruction.</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	<p>In some records, implications for instruction were stated in Part 1 but were not included in the Part 2 summary.</p>		
CF-9	Record Review	<p><b>34 CFR 300.306(a)(1) [Determination of eligibility] OAC 3301-51-01 (B)(21) [Applicability of requirements and definitions]</b></p> <p>Ten (10) out of 19, or 53% of evaluations reviewed did not show evidence that a group of qualified professionals, as appropriate to the suspected disability, were involved in determining whether the child is a child with a disability as well as the child's educational needs.</p>	<p><u>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><u>Opportunities for Improvement</u></p> <p>Buckeye Central Local would benefit from developing an internal practice to monitor the attendance of all qualified team members at ETR meetings. Additional professional learning in special education eligibility categories and criteria would assist all qualified team members in making informed eligibility decisions during Evaluation Team Meetings.</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>During several interviews, it was stated that the psychologist leads the qualified team in eligibility determination. Most of the interviewees were not able to speak to the different eligibility categories nor the corresponding eligibility criteria.</p>		
	Concerns Noted	<p>Half of the records reviewed did not include a group of qualified professionals at the ETR meeting. Qualified team members must be present at the ETR meeting and cannot be excused. Reasonable efforts to gain the parent/guardian's participation in the ETR meeting must be documented with evidence. In several of the reviewed records, the general education teacher was not present. The general education teacher is a required team member.</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><b>SPP Indicator 13</b>  <b>34 CFR 300.320(b) [Transition services]</b>  <b>OAC 3301-51-07 (H)(2) [Definition of individualized education program]</b></p> <p>Eight (8) out of 10, or 80% of applicable IEPs reviewed 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"> <li>1. There are appropriate measurable postsecondary goal(s).</li> <li>2. The postsecondary goals are updated annually.</li> <li>3. The postsecondary goals were based on age appropriate transition assessment (AATA).</li> <li>4. There are transition services that will reasonably enable the student to meet the postsecondary goal(s).</li> <li>5. The transition services include courses of study that will reasonably enable the student to meet the postsecondary goal(s).</li> <li>6. The annual goal(s) are related to the student's transition service needs.</li> <li>7. There is evidence the student was invited to the IEP Team Meeting where transition services were discussed.</li> <li>8. When appropriate, there is evidence that a representative of any participating agency was invited to the IEP Team Meeting.</li> </ol>	<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>Buckeye Central Local 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>During interviews, general post-secondary activities were discussed by staff such as career tech programs offered in separate buildings or within the district. Special educators spoke to a 5-page survey the student and parent complete but there were no specifics provided on targeted transition services and activities for students with disabilities.</p>		

Record Review Item	Evidence of Findings		Evidence of Correction/Recommendations	Must be addressed in CAP
	<b>Concerns Noted</b>	Several records included transition services stating what the student will do. Services should be initiated and provided by the district, above and beyond what is offered in the general education curriculum, and not what the student will do. In several cases there was no evidence that an Age Appropriate Transition Assessment was completed. This assessment provides the individual preferences, interests, needs and strengths of students and drives the transition goal and services development.		
<b>DS-2</b>	<b>Record Review</b>	<p><b>34 CFR 300.320(a)(1) [Definition of individualized education program]</b></p> <p>Fifteen (15) out of 18, or 83% of IEPs reviewed 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"> <li>• 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;</li> <li>• PLOP must relate to the goal measurement</li> <li>• Baseline data provided for developing a measurable goal.</li> </ul> <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> <p><u>Opportunities for Improvement</u></p> <p>There is the opportunity for Buckeye Local School District to develop an Internal Monitoring team that will review and monitor the PLOP to ensure compliance with developing PLOPs that address the individual needs of the student. Technical assistance can be of benefit in helping service providers identify means of obtaining current student present levels of performance without reliance on standardized, vendor assessments that do not provide progress monitoring resources.</p>	<input checked="" type="checkbox"/> Yes The educational agency needs to address this finding in a Corrective Action Plan.
	<b>Interviews/Public Comments</b>	During interviews, staff mentioned the use of many standardized, vendor assessments that were used to develop the baseline of the students' PLOP.		
	<b>Concerns Noted</b>	Most of the IEPs reviewed did not contain baseline data in the PLOP that aligned to the developed measurable goals. The PLOP must also include a comparison statement to grade level expectations, which was missing in some of the reviewed IEPs.		

Record Review Item	Evidence of Findings		Evidence of Correction/Recommendations	Must be addressed in CAP
DS-3	Record Review	<p><b>34 CFR 300.320(a)(2)(i) [Definition of individualized education program]</b></p> <p>Twelve (12) out of 18, or 67% of IEPs reviewed 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"> <li>1. Clearly <u>defined behavior</u>: the specific action the child will be expected to perform.</li> <li>2. The <u>condition</u> (situation, setting or given material) under which the behavior is to be performed.</li> <li>3. <u>Performance criteria</u> desired: the level the child must demonstrate for mastery <b>and</b> the number of times the child must demonstrate the skill or behavior.</li> </ol> <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 the opportunity for Buckeye Local School District to develop an Internal Monitoring team that will review and monitor measurable goals developed to address individual needs of students 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 and performance criteria.</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>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>		

Record Review Item	Evidence of Findings		Evidence of Correction/Recommendations	Must be addressed in CAP
DS-4	Record Review	<p><b>34 CFR 300.320(a)(2)(i) [Definition of individualized education program]</b></p> <p>Four (4) out of 18, or 22% of IEPs reviewed did not contain annual goals that address 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><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>	<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			
DS-5	Record Review	<p><b>34 CFR 300.320(a)(2)(i) [Definition of individualized education]</b></p> <p>Two (2) out of 10, or 20% of applicable IEPs reviewed 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 teams of the IEPs 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><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>	<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			

Record Review Item	Evidence of Findings		Evidence of Correction/Recommendations	Must be addressed in CAP
DS-6	Record Review	<p><b>34 CFR 300.320(a)(4) [Definition of individualized education program]</b>  <b>OAC 3301-51-07 (H)(1)(e)(i) [Definition of IEP]</b></p> <p>Twelve (12) out of 18, or 67% of IEPs reviewed 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></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.</p>	<input checked="" type="checkbox"/> Yes The educational agency needs to address this finding in a Corrective Action Plan.
	Interviews/Public Comments		<p><u>Opportunities for Improvement</u></p> <p>Buckeye Central Local would benefit from professional learning and technical assistance with defining and implementing specially designed instruction. Additionally, the staff who develop IEPs would benefit from professional learning on how to complete Section 7, providing clear statements of SDI which describe the nature of instruction that aligns to the needs of the student and supports achievement of the measurable annual goals. This SDI should describe skills and methods used for the instruction of the measurable, annual goals.</p>	
	Concerns Noted	<p>Several of the reviewed IEPs listed the general education teacher as the provider of the listed specially designed instruction (SDI). The general education teacher and other support personnel should be listed in the Supports for School Personnel section in their support of the implementation of SDI. Only the Intervention Specialist and Related Service providers should be listed as the provider of SDI in Section 7. Some of the listed SDI did not match the annual measurable goals. Several of the IEPs listed SDI that was reflective of instruction provided in the general education setting and did not describe the nature of the instruction that aligns with the needs of the student.</p>		

Record Review Item	Evidence of Findings		Evidence of Correction/Recommendations	Must be addressed in CAP
DS-7	Record Review	<p><b>34 CFR 300.320(a)(7) [Definition of individualized education program]</b>  <b>OAC 3301-51-07 (H)(1)(i) [Definition of IEP]</b></p> <p>Two (2) out of 18, or 11% of IEPs reviewed did not indicate the specific location where the specially designed instruction will be provided.</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 location where the specially designed instruction will be provided.</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 location where specially designed instruction will occur.</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-8	Record Review	<p><b>34 CFR 300.320(a)(7) [Definition of individualized education program]</b>  <b>OAC 3301-51-07 (H)(1)(i) [Definition of IEP]</b></p> <p>Two (2) out of 18, or 11% of IEPs reviewed did not indicate the amount of time and frequency of the specially designed instruction.</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.</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 to be provided.</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><b>34 CFR 300.320(a)(7) [Definition of individualized education program]</b>  <b>OAC 3301-51-07 (H)(1)(e) [Definition of IEP]</b></p> <p>All applicable IEPs reviewed identified related services that address the needs of the child and support the annual goals.</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><b>34 CFR 300.320(a)(7) [Definition of individualized education]</b>  <b>OAC 3301-51-07 (H)(1)(i) [Definition of IEP]</b></p> <p>All applicable IEPs reviewed indicated the location where the related services will be provided.</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			
DS-11	Record Review	<p><b>34 CFR 300.320(a)(7) [Definition of individualized education program]</b>  <b>OAC 3301-51-07 (H)(1)(i) [Definition of IEP]</b></p> <p>All applicable IEPs reviewed indicated the amount of time, duration and frequency of the related services to be provided.</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			
DS-12	Record Review	<p><b>34 CFR 300.324(a)(2)(v) [Development of IEP] OAC 3301-51-01(B)(3) [Applicability of requirements and definitions]</b></p> <p>One (1), or 100% of applicable IEPs reviewed did not identify assistive technology 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 assistive technology and/or services that would directly assist the child with a disability to increase, maintain, or improve their functional capabilities and include them on the IEP.</p> <p><u>Systemic Correction</u></p> <p>The educational agency must submit evidence to the Department of written procedures and practices regarding assistive technology.</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>One IEP listed the use of assistive technology "as needed." The description of assistive technology must indicate the technology and services the student needs including the condition and/or extent.</p>		

Record Review Item	Evidence of Findings		Evidence of Correction/Recommendations	Must be addressed in CAP
DS-13	Record Review	<p><b>34 CFR 300.320(a)(6)(i) [Definition of individualized education]</b>  <b>OAC 3301-51-07 (H)(1)(g) [Definition of IEP]</b>            Fourteen (14) out of 15, or 93% of applicable IEPs reviewed 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>            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>            The educational agency must submit evidence to the Department of written procedures and practices regarding accommodations.</p>	<p><input checked="" type="checkbox"/> Yes            The educational agency needs to address this finding in a Corrective Action Plan.</p>
	Interviews/Public Comments	<p>During interviews staff members stated they are aware of student accommodations and work collaboratively (general and special education providers) to ensure students receive the listed accommodations in their IEPs.</p>		
	Concerns Noted	<p>Almost all of the reviewed IEPs included some accommodations that did not clearly state the condition and/or extent for all of the listed accommodations. Listing accommodations “as needed”, “at the discretion of the teacher” or “as requested” does not provide clarity on when and/or how the accommodations will be provided to the student.</p>		
DS-14	Record Review	<p><b>34 CFR 300.320(a)(4) [Definition of individualized education program]</b>  <b>OAC 3301-51-07 (H)(1)(e) [Definition of IEP]</b>            Seven (7) out of 10, or 70% of applicable IEPs reviewed did not identify modifications to enable the child to be involved and make progress in the general education curriculum.</p>	<p><u>Individual Correction</u>            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>            The educational agency must submit evidence to the Department of written procedures and practices regarding modifications.</p> <p><u>Opportunities for Improvement</u>            There is the opportunity for Buckeye Central Local to participate in professional learning that will present the differences between accommodations and modifications and how to incorporate these into Individual Education Programs to support the educational needs of students with disabilities.</p>	<p><input checked="" type="checkbox"/> Yes            The educational agency needs to address this finding in a Corrective Action Plan.</p>
	Interviews/Public Comments	<p>During interviews staff members stated they are aware of student modifications and work collaboratively (general and special education providers) to ensure students receive the listed modifications in their IEPs.</p>		
	Concerns Noted	<p>Reviewed IEPs listed modifications that did not provide clarity to the extent of the modifications regarding the subject matter or performance expectations. Modifications listed “as appropriate” or “at the discretion of the teacher” do not provide clarity as to the extent of the modification in either material or performance changes.</p>		

Record Review Item	Evidence of Findings		Evidence of Correction/Recommendations	Must be addressed in CAP	
DS-15	Record Review	<p><b>34 CFR 300.320(a)(4) [Definition of individualized education program]</b>  <b>OAC 3301-51-07 (H)(1)(e) [Definition of IEP]</b></p> <p>Ten (10) out of 11, or 91% of applicable IEPs reviewed did not identify supports for school personnel to enable the child to be involved and make progress in the general education curriculum.</p>	<p><u>Individual Correction</u></p> <p>The educational agency must reconvene the teams of the IEPs identified as noncompliant to review the supports for school personnel that were identified by the IEP team and define the supports on the IEP including who will provide the support and when it will take place.</p> <p><u>Systemic Correction</u></p> <p>The educational agency must submit evidence to the Department of written procedures and practices regarding supports for school personnel.</p> <p><u>Opportunities for Improvement</u></p> <p>There is the opportunity for Buckeye Local Schools to participate in professional learning that will target who delivers the specially designed instruction that is listed in Section 7 of the IEP and who can support the provision of all services and supports listed in Section 7 of the IEP.</p>	<input checked="" type="checkbox"/> Yes The educational agency needs to address this finding in a Corrective Action Plan.	
	Interviews/Public Comments	<p>During interviews, staff indicated there are many people providing supports to students, including general education teachers and paraprofessionals. Depending on the grade level the involvement of support personnel in providing services varies greatly from minor supports to the provision of specially designed instruction minutes.</p>			
	Concerns Noted	<p>Several reviewed IEPs listed supports but did not clearly define all the required components, such as who is providing the support, who is receiving the support and what support will be provided. These supports should describe adult-to-adult consultation.</p>			
DS-16	Record Review	<p><b>OAC 3301-51-07 (H)(1)(h)(ii) [Definition of IEP]</b></p> <p>All applicable student records reviewed had 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-17	Record Review	<p><b><i>OAC 3301-51-07(L)(2) [Development, review and revision of IEP]</i></b></p> <p>Eight (8) out of 11, or 73% of applicable student records reviewed 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 measurable annual goals and services consistent with progress made.</p> <p><u>Opportunities for Improvement</u></p> <p>Buckeye Central Local Schools will benefit from developing consistent procedures for all service providers to monitor progress to ensure that data is collected on annual goal progress consistently and in the same measurement and performance criteria as defined in the measurable goals.</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>Feedback during interviews indicated that progress is being monitored in multiple settings by multiple providers but not necessarily in the measurement and performance criteria as defined in the annual goals. Sometimes progress was being monitored through and then reported by classroom grades and performance on class tests/assessments rather than in and on the same condition, behavior and performance criteria as defined in the annual goal.</p>		
	Concerns Noted	<p>Progress monitoring was not always completed in the same measurement and performance criteria as defined in the annual measurable goals. Additionally, some progress monitoring that was submitted was not current or included for every goal in the IEP.</p>		
DS-18	Record Review	<p><b><i>OAC 3301-51-07(L) [Development, review and revision of IEP]</i></b></p> <p>All applicable IEPs reviewed showed 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><input checked="" type="checkbox"/> NA</p>
	Interviews/Public Comments			
	Concerns Noted			

Record Review Item	Evidence of Findings		Evidence of Correction/Recommendations	Must be addressed in CAP
DS-19	Record Review	<p><b>34 CFR 300.321(5) [IEP team]</b>  <b>OAC 3301-51-07(I) [IEP team]</b></p> <p>Four (4) out of 18, or 22% of IEPs reviewed 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"> <li>• 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, <b>and</b></li> <li>• 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, <b>or</b></li> <li>• Reconvene the IEP team to review the IEP with all required members present.</li> </ul> <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><b>34 CFR 300.114 [LRE requirements] and 300.320(a)(5) [Definition of individualized education program]</b>  <b>OAC 3301-51-07 (H)(1)(f) [Definition of individualized education program]</b></p> <p>Eight (8) out of 16, or 50% of applicable IEPs reviewed did not include an explanation of the extent to which the child will not participate with nondisabled children in the general education classroom.</p>	<p><u>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"> <li>• Be based on the needs of the child, not the disability.</li> <li>• Reflect that the team has given adequate consideration to meeting the student’s needs in the general classroom with supplementary aids and services.</li> <li>• 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.</li> <li>• Describe potential harmful effects to the child or others, if applicable.</li> </ul> <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>Buckeye Central Local will benefit from training on the continuum of alternative placements for all staff. Additional training and technical assistance would benefit staff members developing LRE statements to ensure that the statements provided in IEPs provide a justification for why the student is not participating in the general education environment based on the individual student’s need(s) and aligns with the specially designed instruction and/or related services location.</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>During interviews, staff members expressed limited placement options across the continuum of alternative placements, particularly regarding behavioral services and supports. During the parent public meeting, concern was expressed about the limited options in the district for services and supports for behavioral concerns.</p>		
	Concerns Noted	<p>Many of the reviewed IEPs contained a description of the location for the delivery of the specially designed instruction or listed accommodations to be provided to the student but 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 match the location listed in Section 7 for specially designed instruction.</p>		

**Additional Concerns:**

1. During interviews, no one was able to speak to the provision of extended school year (ESY) to any student. Buckeye Central Local would benefit from reviewing the process and procedure for determining extended school year and ensure through the internal monitoring process along with administrative oversight that this data is being utilized to make the ESY decision during IEP meetings.
2. Reviewed records for speech language impairment (SLI) did not appear to be comprehensive evaluations. The general education teacher is a required team member in the planning and evaluation process. The district would benefit from reviewing and providing professional learning on the process for completing evaluations of suspected SLI.
3. There are a lot of paraprofessional aide services noted in IEPs and during interviews. It was stated that at the high school level, paraprofessionals are providing a lot of the student supports. Additionally, general education teachers at the high school level expressed the desire to be able to meet and plan more frequently with the intervention specialists to discuss the instruction and progress of students with disabilities. The process of co-teaching at the high school level particularly could use a review to determine any changes needed to support the delivery of special education services and supports.