

Gallia County Board of Developmental Disabilities (CBDD)
IRN: 070615

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 Gallia County Board of Developmental Disabilities (CBDD) 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 December 5-7, 2023, 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

Gallia County Board of Developmental Disabilities mailed 42 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 did not receive any parent comments.

2. Pre-Onsite Data Analysis

The Department conducted a comprehensive review which included district, 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 10 records of school-age students with disabilities. The Department consultants selected records of students with disabilities from a variety of disability categories and ages. Five student records were selected for IEP verification in the classroom setting. IEP verifications were completed in two different settings per student. During the IEP verifications, OEC staff noticed that teachers were very knowledgeable of the students' goals and other needs outlined in the IEPs. Students and staff appeared to have built a good rapport with each other.

4. Staff/Administrative Interviews

On Tuesday, December 5, 2023, the Department consultants held eight sessions of interviews with eight administrators, four school psychologists, four related service providers, nine paraprofessionals, and four intervention specialists. 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:

Gallia County Board of Developmental Disabilities staff has laid the foundation for setting high expectations for all students to be successful no matter their age, disability category or grade level. This unique and distinctive foundation will allow the educational agency to be successful with their implementation of OEC's Monitoring Process and recommendations.

Staff spoke very highly about the positive support and guidance that they receive from the Director at Gallia County Board of Developmental Disabilities. Her willingness to always ensure staff feel heard through her open-door policy has been highly received by special education staff as well as other members of the faculty.

Staff stated they try hard to engage with parents and build relationships. Teachers are heavily involved with their students and are working with families to provide the supports that are needed based on academics or behavior.

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 chralin.forsthoefel@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: April 4, 2024

Department Trainings

As part of the Department monitoring process, Gallia CBDD personnel and personnel from its two associate districts, as identified by the Department, are required to complete the OEC Required Special Education Essentials 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 80% or more on each quiz. Participants who do not achieve at least 80% will be contacted by the State Support Team (SST) for additional training. The Department will also provide the internal monitoring team in-person training regarding establishing an internal monitoring team and process on February 12, 2024. Any internal monitoring team members who do not attend the in-person training provided by the Department will be required to complete the Internal Monitoring Process LMS module.

Completion of LMS Training Modules Due Date: April 4, 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: May 20, 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: December 6, 2024

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

For questions regarding the review, please contact: Chralin Forsthoefel, the Department's IDEA Monitoring Contact, at 614-595-4088, toll-free at (877) 644-6338, or by e-mail at Chralin.forsthoefel@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-2	<p><i>OAC 3301-51-06 [Evaluations]</i></p> <p>One out of five applicable evaluations reviewed, or 20%, 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>It is recommended that the educational agency review and revise its written procedures and practices regarding documentation of intervention and support 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><input checked="" type="checkbox"/> No</p> <p>This finding does <u>not</u> need to be addressed in a Corrective Action Plan.</p>
CF-3	<p><i>34 CFR 300.501(b) [Parent participation in meetings] and OAC 3301-51-06 (E)(2)(a) [Evaluation procedures].</i></p> <p>One out of five applicable student records reviewed, or 20%, 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><u>Systemic Correction</u></p> <p>It is recommended that the educational agency review and revise its 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><input checked="" type="checkbox"/> No</p> <p>This finding does <u>not</u> need to be addressed in a Corrective Action Plan</p>
CF-4	<p><i>34 CFR 300.300 [Parental Consent]</i></p> <p>All student records reviewed provided evidence of parental consent obtained prior to evaluation.</p>	<p><u>Individual Correction</u></p> <p>NA</p> <p><u>Systemic Correction</u></p> <p>NA</p>	<p><input checked="" type="checkbox"/> NA</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>Five out of five applicable evaluations reviewed, or 100%, did not provide evidence that the evaluation addresses all areas related to the suspected disability.</p> <p>Interviews</p> <p>Staff indicated that they are unsure how to complete the Part 1s and could benefit from training.</p> <p>Concerns Noted</p> <p>During the review of records, it was noted that several Part 1s were either missing the required components or were identified on the planning form, but not included in a Part 1.</p> <p>Other areas noted during the review of records were:</p> <ul style="list-style-type: none"> The title of assessments did not match the identified area on the planning form. This left the reviewer to make an educated guess as to what assessment the reviewer was looking at per the planning form. The person responsible for a specific Part 1 was not the person who completed the assessment and Part 1. Assessments that are listed as additional testing do not appear to be comprehensive in nature in order for the IEP team to identify all the child's special education and related service needs. Psychoeducational report, questionnaires and/or checklists were not summarized and were also missing Needs and Implications or not included in ETR. 	<p>Individual Correction</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>Systemic Correction</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>Gallia County Board of Developmental Disabilities along with its two associate districts need to develop a procedure of checks and balances within their communication plan to include:</p> <ul style="list-style-type: none"> Active team participation (Gallia County Board of Developmental Disabilities and associate districts) in the ETR planning process. Appropriate evaluation data is available and comprehensive in nature. Assessments identified on the planning form are being completed and represented in Part 1. The person responsible for assessment and completing Part 1 is the correctly identified staff. Questionnaires and checklist data are summarized and contain needs and implications. <p>As part of its corrective action plan, Gallia County Board of Developmental Disabilities will provide the Department with a detailed timeline of the activities to complete its communication plan with the two associate districts. The communication plan will be completed and disseminated as part of Gallia County Board of Developmental Disabilities' strategic improvement plan.</p> <p>Opportunities for Improvement</p> <p>There is an opportunity to provide professional development and technical assistance to support staff with the completion of the Part 1s, especially with identifying educational needs and specific implications for instruction.</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>Four out of five applicable evaluations reviewed, or 80%, did not show evidence of clearly stating the summary of assessment results.</p> <p><u>Interviews</u></p> <p>Staff indicated that they are not actively involved in the development of the Part 2 summary of assessment results.</p> <p><u>Concerns Noted</u></p> <p>During the review of records, the information from Part 1 was not summarized in a clear and concise manner in Part 2. In some instances, the information was entirely omitted. Information in Part 1 must be brought forward to Part 2 in a manner that can be clearly understood by the parent and used by the IEP team to develop meaningful goals and services.</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. 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>Gallia County Board of Developmental Disabilities along with its two associate districts need to develop a procedure of checks and balances within their communication plan to ensure:</p> <ul style="list-style-type: none"> • Active team participation (Gallia County Board of Developmental Disabilities and associate districts) in the ETR planning process. • Assessments identified on the planning form are being completed and represented in Part 1 and are summarized within Part 2 in parent friendly language. <p>As part of its corrective action plan, Gallia County Board of Developmental Disabilities will provide the Department with a detailed timeline of the activities to complete its communication plan with the two associate districts. The communication plan will be completed and disseminated as part of Gallia County Board of Developmental Disabilities' strategic improvement plan.</p> <p><u>Opportunities for Improvement</u></p> <p>Gallia County Board of Developmental Disabilities has an opportunity to develop an internal practice that will monitor the completion of the Part 2 Summary of Assessment Results so that all areas assessed in a Part 1 Individual Evaluator's Assessment are summarized in the Part 2 summary. This is an opportunity for professional development and/or targeted technical assistance from SST staff.</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 five applicable evaluation team reports reviewed, or 80%, did not contain a clear and succinct description of educational needs.</p> <p><u>Interviews</u></p> <p>Staff indicated a need for professional development in the areas of identifying appropriate educational needs based upon the summary of assessments.</p> <p><u>Concerns Noted</u></p> <p>Educational needs were sometimes generic in nature and did not address the child's individualized needs.</p> <p>Sometimes educational needs were stated in 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>Gallia County Board of Developmental Disabilities along with its two associate districts need to develop a procedure of checks and balances within their communication plan to ensure:</p> <ul style="list-style-type: none"> The educational needs listed in all Part 1s are being carried over in Part 2 or if omitted in Part 2 there is an explanation as to why. <p>As part of its corrective action plan, Gallia County Board of Developmental Disabilities will provide the Department with a detailed timeline of the activities to complete its communication plan with the two associate districts. The communication plan will be completed and disseminated as part of Gallia County Board of Developmental Disabilities' strategic improvement plan.</p> <p><u>Opportunities for Improvement</u></p> <p>Gallia County Board of Developmental Disabilities has an opportunity to develop an internal practice to monitor the completion of the Part 2 Summary of Assessment Results so that all areas assessed in a Part 1 Individual Evaluator's Assessment are summarized in the Part 2 summary. This is an opportunity for professional development and/or targeted technical assistance from the State Support Team staff.</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-8	<p>34 CFR 300.306(c) [Procedures for determining eligibility and educational need]</p> <p>Two out of five applicable evaluation team reports reviewed, or 40%, did not contain specific implications for instruction.</p> <p><u>Interviews</u></p> <p>Staff indicated a need for professional development in the areas of identifying appropriate implications for instruction based upon the summary of assessments.</p> <p><u>Concerns Noted</u></p> <p>Sometimes implications for instruction were stated in 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 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. 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>Gallia County Board of Developmental Disabilities along with its two associate districts need to develop a procedure of checks and balances within their communication plan to ensure:</p> <ul style="list-style-type: none"> • The implications for instruction listed in all Part 1s are being carried over in Part 2 or if omitted in Part 2 there is an explanation as to why. <p>As part of its corrective action plan, Gallia County Board of Developmental Disabilities will provide the Department with a detailed timeline of the activities to complete its communication plan with the two associate districts. The communication plan will be completed and disseminated as part of Gallia County Board of Developmental Disabilities' strategic improvement plan.</p> <p><u>Opportunities for Improvement</u></p> <p>Gallia County Board of Developmental Disabilities has an opportunity to develop an internal practice to monitor the completion of the Part 2 Summary of Assessment Results so that all areas assessed in a Part 1 Individual Evaluator's Assessment are summarized in the Part 2 summary. This is an opportunity for professional development and/or targeted technical assistance from SST staff.</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-9	<p>34 CFR 300.306(a)(1) [Determination of eligibility] OAC 3301-51-01 (B)(21) [Applicability of requirements and definitions]</p> <p>Two out of five applicable evaluations reviewed, or 40%, 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>Concerns Noted</p> <p>Missing signature of the district representative and parent signature on required forms. It is also important to note that on another ETR while signatures were present none of the team members acknowledged if they agreed or disagreed on Part 5 of the PR-06 required form.</p>	<p>Individual Correction</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>Systemic Correction</p> <p>The educational agency must submit evidence to the Department of written 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>Gallia County Board of Developmental Disabilities along with its two associate districts need to develop a procedure of checks and balances within their communication plan to ensure:</p> <ul style="list-style-type: none"> All required participants are present during the ETR meeting and filling out all required sections appropriately. <p>As part of its corrective action plan, Gallia County Board of Developmental Disabilities will provide the Department with a detailed timeline of the activities to complete its communication plan with the 2 associate districts. The communication plan will be completed and disseminated as part of Gallia County Board of Developmental Disabilities' strategic improvement plan.</p>	<p><input checked="" type="checkbox"/> Yes</p> <p>This finding needs to be addressed in a Corrective Action Plan.</p>
CF-10	<p>OAC 3301-51-01 (B)(10) [Definitions] and 3301-51-06 [Evaluations]</p> <p>Three out of five applicable evaluations reviewed, or 60%, did not provide a justification for the eligibility determination decision.</p> <p>Interviews</p> <p>Staff indicated they could use additional training to understand how to write a compliant justification statement for the disability determination.</p> <p>Concerns Noted</p> <p>In many cases, the justification failed to identify how the disability affects the child's progress in the general education curriculum.</p>	<p>Individual Correction</p> <p>The educational agency will reconvene the ETR teams to conduct a reevaluation and provide a clear justification for the eligibility determination.</p> <p>Systemic Correction</p> <p>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><input checked="" type="checkbox"/> Yes</p> <p>This finding needs to be addressed in a Corrective Action Plan.</p>

Record Review Item	Evidence of Findings	Evidence of Corrections/Recommendations	Must be Addressed in CAP
		<p>Gallia County Board of Developmental Disabilities along with its two associate districts need to develop a procedure of checks and balances within their communication plan to ensure:</p> <ul style="list-style-type: none"> • The statement provides a justification for the eligibility determination decision describing how the student meets or does not meet the eligibility criteria AND • The justification statement includes how the disability affects the child's progress in the general education curriculum. <p>As part of its corrective action plan, Gallia County Board of Developmental Disabilities will provide the Department with a detailed timeline of the activities to complete its communication plan with the two associate districts. The communication plan will be completed and disseminated as part of Gallia County Board of Developmental Disabilities' strategic improvement plan.</p> <p><u>Opportunities for Improvement</u></p> <p>The educational agency would benefit from professional development from the State Support Team on how to write a compliant justification statement for the disability determination.</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	<p>SPP Indicator 13 34 CFR 300.320(b) [Transition services] OAC 3301-51-07 (H)(2) [Definition of individualized education program]</p> <p>Three out of three applicable IEPs reviewed, or 100%, 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 Interviews noted a lack of understanding of the secondary transition process and responsibilities, indicating a need for training and technical assistance in this area.</p> <p>Concerns Noted Preferences, Interests, Needs, and Strengths (PINS) were provided but did not relate to the students’ goals or were too generic to write a student specific goal. Often, strengths and preferences were missing. Transition services must be written to indicate what services the LEA/staff will provide to the student and not what the student will do. Some records did not show evidence that the student was invited to the IEP meeting.</p>	<p>Individual Correction 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>Systemic Correction 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>Gallia County Board of Developmental Disabilities along with its two associate districts need to develop a procedure of checks and balances within their communication plan to ensure:</p> <ul style="list-style-type: none"> • All 8 questions on the indicator 13 checklist are answered, meeting the unique needs of each student as well as written compliantly. <p>As part of its corrective action plan, Gallia County Board of Developmental Disabilities will provide the Department with a detailed timeline of the activities to complete its communication plan with the two associate districts. The communication plan will be completed and disseminated as part of Gallia County Board of Developmental Disabilities’ strategic improvement plan.</p> <p>Opportunities for Improvement There is a need for all personnel involved with students of transition age to be trained in, and familiar with, the secondary transition process, including responsibilities at every level. Training must be provided to all ETR and IEP members responsible for assessing for and writing transition plans to ensure they are compliant and beneficial to the student.</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-2	<p>34 CFR 300.320(a)(1) [Definition of individualized education program]</p> <p>Ten (10) out of 10 IEPs reviewed, or 100%, did not contain Present Levels of Academic Achievement and Functional Performance (PLOP) that addressed the needs of the student.</p> <p>Concerns Noted</p> <p>The Present Levels of Performance in the IEPs reviewed were inconsistent in quality and content.</p> <p>Measurable baseline data were missing in many cases.</p> <p>Often, the Present Levels of Performance did not relate to the annual goals as well as missing the grade level standard comparison.</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 training(s) have been completed.</p> <p>Gallia County Board of Developmental Disabilities along with its two associate districts need to develop a procedure of checks and balances within their communication plan to ensure:</p> <ul style="list-style-type: none"> • Present Levels of Performance include both current baseline data and a grade level or age-appropriate comparison statement. <p>As part of its corrective action plan, Gallia County Board of Developmental Disabilities will provide the Department with a detailed timeline of the activities to complete its communication plan with the two associate districts. The communication plan will be completed and disseminated as part of Gallia County Board of Developmental Disabilities' strategic improvement plan.</p>	<p><input checked="" type="checkbox"/> Yes</p> <p>This finding needs to be addressed in a Corrective Action Plan.</p>

Record Review Item	Evidence of Findings	Evidence of Correction/Recommendations	Must be Addressed in CAP
		<p><u>Opportunities for Improvement</u></p> <p>There is an opportunity for professional development and/or targeted technical assistance in developing Present Levels of Academic Achievement and Functional Performance that clearly address the needs of the student, as well as relate to the measurable goals.</p>	
DS-3	<p><i>34 CFR 300.320(a)(2)(i) [Definition of individualized education program]</i></p> <p>Eight out of 10 IEPs reviewed, or 80%, did not contain measurable annual goals.</p> <p><u>Interviews</u></p> <p>During the interview sessions, staff members indicated a need for professional development on how to write measurable goals.</p> <p><u>Concerns Noted</u></p> <p>Goals often did not contain all required elements or were worded in a confusing manner with too many measurements or skills in one goal.</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>Gallia County Board of Developmental Disabilities along with its two associate districts need to develop a procedure of checks and balances within their communication plan to ensure:</p> <ul style="list-style-type: none"> • Who will write the measurable goals for students attending Gallia County Board of Developmental Disabilities as well as who will amend them if needed. • Measurable goals contain all required components. • Measurable goals reference one specific skill. • Measurable goals contain specific conditions so the skill can be better understood. • Goals are written specifically to the student's needs listed or identified within their ETR. <p>As part of its corrective action plan, Gallia County Board of Developmental Disabilities will provide the Department with a detailed timeline of the activities to complete its communication</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>plan with the two associate districts. The communication plan will be completed and disseminated as part of Gallia County Board of Developmental Disabilities' strategic improvement plan.</p> <p><u>Opportunities for Improvement</u> There is an opportunity for professional development and targeted technical assistance in writing compliant measurable annual goals.</p>	
DS-4	<p>34 CFR 300.320(a)(2)(i) [Definition of individualized education program] One out of seven applicable IEPs reviewed, or 14%, did not contain annual goals that address the child's academic area(s) of need.</p>	<p><u>Individual Correction</u> 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> 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><input checked="" type="checkbox"/> No 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] One out of 10 IEPs reviewed, or 10%, did not contain annual goals that address the child's functional area(s) of need.</p>	<p><u>Individual Correction</u> 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> It is recommended that the educational agency review and revise its written procedures and practices regarding the IEP process of addressing identified functional 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><input checked="" type="checkbox"/> No 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
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] Ten (10) out of 10 IEPs reviewed, or 100%, 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>Interviews Most respondents indicated familiarity with the required elements for SDI components, however, the record reviews identified a need for further training and technical assistance in this area.</p> <p>Concerns Noted The review of records indicated that the SDI statement was missing the nature of the instruction that aligns with the needs of the student and supports achievement of annual goals.</p> <p>One on one, whole group, small group, consults must be separated into separate SDI sections with the amount of time and frequency specified for each type of delivery.</p> <p>If SDI is not being tracked by the intervention specialist, then this would not be considered SDI and would be considered a consultative service. This could then be a captured service listed under Supports for School Personnel. In this area of the IEP, the district would describe adult-to-adult consultation which would include what support will be provided, who will receive the support, and who will deliver the support.</p>	<p>Individual Correction 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>Systemic Correction 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>Gallia County Board of Developmental Disabilities along with its two associate districts need to develop a procedure of checks and balances within their communication plan to ensure SDI:</p> <ul style="list-style-type: none"> • Is describing the nature of the instruction that aligns with the needs of the child and supports achievement of annual goals. • Is specific to the student's individual needs. • Has the appropriate provider listed. <p>As part of its corrective action plan, Gallia County Board of Developmental Disabilities will provide the Department with a detailed timeline of the activities to complete its communication plan with the two associate districts. The communication plan will be completed and disseminated as part of Gallia County Board of Developmental Disabilities' strategic improvement plan.</p> <p>Opportunities for Improvement With the development of a universal tracking system for SDI, the district will be ensuring their students are receiving all the time and frequency stated within section 7 of their IEP.</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>Nine out of 10 IEPs reviewed, or 90%, did not indicate the specific location where the specially designed instruction will be provided.</p> <p>Interviews</p> <p>Although most respondents indicated familiarity with the required elements for SDI components, there is still a need for further training and technical assistance in this area.</p> <p>Concerns Noted</p> <p>After a review of records, multiple locations were identified for services, and these must be listed separately.</p> <p>Location was listed as name of school and not specific location within the building.</p> <p>Location was listed at MD, AU and ED; this is not a location but a list of disability categories.</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>Gallia County Board of Developmental Disabilities along with its two associate districts need to develop a procedure of checks and balances within their communication plan to ensure:</p> <ul style="list-style-type: none"> • IEPs specifically identifies the location of services. • If there is more than one location, each location must be separated to show the specially designed instruction and/or related services for each location. <p>As part of its corrective action plan, Gallia County Board of Developmental Disabilities will provide the Department with a detailed timeline of the activities to complete its communication plan with the two associate districts. The communication plan will be completed and disseminated as part of Gallia County Board of Developmental Disabilities' strategic improvement plan.</p> <p>Opportunities for Improvement</p> <p>With the development of a universal tracking system for SDI and an internal monitoring and review system, the district will be ensuring their students are receiving services stated within section 7 in the appropriate location as identified in their IEP.</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>All IEPs reviewed indicated the amount of time and frequency of the specially designed instruction.</p>	<p>Individual Correction</p> <p>NA</p> <p>Systemic Correction</p> <p>NA</p>	<p><input checked="" type="checkbox"/> NA</p>

Record Review Item	Evidence of Findings	Evidence of Correction/Recommendations	Must be Addressed in CAP
DS-9	<p>34 CFR 300.324(a)(2)(v) [Development of IEP] OAC 3301-51-01(B)(3) [Applicability of requirements and definitions] All applicable IEPs reviewed identified assistive technology to enable the child to be involved and make progress in the general education curriculum.</p>	<p><u>Individual Correction</u> NA</p> <p><u>Systemic Correction</u> 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] One out of 10 IEPs reviewed, or 10%, 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> It is recommended that the educational agency review and revise its 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>	<input checked="" type="checkbox"/> No This finding does <u>not</u> need to be addressed in a Corrective Action Plan.
DS-11	<p>34 CFR 300.320(a)(4) [Definition of individualized education program] OAC 3301-51-07 (H)(1)(e) [Definition of IEP] All IEPs reviewed identified modifications to enable the child to be involved and make progress in the general education curriculum.</p>	<p><u>Individual Correction</u> NA</p> <p><u>Systemic Correction</u> NA</p>	<input checked="" type="checkbox"/> NA
DS-12	<p>34 CFR 300.320(a)(4) [Definition of individualized education program] OAC 3301-51-07 (H)(1)(e) [Definition of IEP] Four out of nine applicable IEPs reviewed, or 44%, did not identify supports for school personnel to enable the child to be involved and make progress in the general education curriculum.</p> <p><u>Interviews</u> During staff interviews, there were inconsistencies in how to appropriately document/describe supports for school personnel.</p>	<p><u>Individual Correction</u> 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> 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>	<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> Adult-to-adult consultation was not described. The educational agency needs to identify what support will be provided, who will receive the support and who will deliver the support.</p>	<p>Gallia County Board of Developmental Disabilities along with its two associate districts need to develop a procedure of checks and balances within their communication plan to ensure:</p> <ul style="list-style-type: none"> • Educational agency identifies what support will be provided, who will receive it and who will deliver the support. <p>As part of its corrective action plan, Gallia County Board of Developmental Disabilities will provide the Department with a detailed timeline of the activities to complete its communication plan with the two associate districts. The communication plan will be completed and disseminated as part of Gallia County Board of Developmental Disabilities' strategic improvement plan.</p> <p><u>Opportunities for Improvement</u> An internal monitoring and review system would promote compliance in this area.</p>	
DS-13	<p><i>OAC 3301-51-07 (H)(1)(h)(ii) [Definition of IEP]</i> Six out of six applicable student records reviewed, or 100%, did not have a justification statement explaining why the student cannot participate in the regular assessment and why the alternate assessment is appropriate for the student.</p> <p><u>Interviews</u> During staff interviews, it was clear that the staff were aware of the AASCD Decision-Making Tool.</p> <p><u>Concerns Noted</u> There was no evidence provided that the IEP team used and signed the required AASCD Decision-Making Tool.</p>	<p><u>Individual Correction</u> The educational agency must reconvene the teams of the IEPs identified as noncompliant to review and determine if the alternate assessment is appropriate for the student.</p> <p><u>Systemic Correction</u> The educational agency must submit evidence to the Department of written procedures and practices regarding the determination of participation in the AASCD. The Department will verify 100% compliance in this area through a review of new records that have been written after all trainings have been completed.</p> <p>Gallia County Board of Developmental Disabilities along with its two associate districts need to develop a procedure of checks and balances within their communication plan to ensure:</p> <ul style="list-style-type: none"> • The IEP team uses the required Alternate Assessment for Students with Significant Cognitive Disabilities (AASCD) Decision-Making Tool to document evidence of significant cognitive disability. <p>As part of its corrective action plan, Gallia County Board of Developmental Disabilities will provide the Department with a detailed timeline of the activities to complete its communication plan with the two associate districts. The communication plan will</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>be completed and disseminated as part of Gallia County Board of Developmental Disabilities' strategic improvement plan.</p> <p><u>Opportunities for Improvement</u></p> <p>An internal monitoring and review system would promote compliance in this area.</p>	
<p>DS-14</p>	<p><i>OAC 3301-51-07(L)(2) [Development, review and revision of IEP]</i></p> <p>Nine out of nine applicable student records reviewed, or 100%, did not show evidence of progress reporting data collected and analyzed to monitor performance on each goal.</p> <p><u>Interviews</u></p> <p>Staff reported that the method of reporting annual measurable goals is left to the discretion of the teacher.</p> <p><u>Concerns Noted</u></p> <p>Progress reported does not align to measurement(s) used in the annual goal statement.</p> <p>Progress on the annual goal itself needs to contain both qualitative and quantitative data relating to the mastery level of the goal.</p> <p>Modified Progress Reports did not have all the required components.</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. 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>Gallia County Board of Developmental Disabilities along with its two associate districts need to develop a procedure of checks and balances within their communication plan to ensure:</p> <ul style="list-style-type: none"> • Progress reports align to the measurement(s) used in the annual goal statement. • Progress on the annual goal itself contains both qualitative and quantitative data relating to the mastery level of the goal. • Modified Progress Reports contain the required components. <ul style="list-style-type: none"> ○ Data Sources ○ Data Points ○ Comments ○ On Track ○ Goal Met <p>As part of its corrective action plan, Gallia County Board of Developmental Disabilities will provide the Department with a detailed timeline of the activities to complete its communication plan with the two associate districts. The communication plan will be completed and disseminated as part of Gallia County Board of Developmental Disabilities' strategic improvement plan.</p>	<p><input checked="" type="checkbox"/> Yes</p> <p>This finding needs to be addressed in a Corrective Action Plan.</p>

Record Review Item	Evidence of Findings	Evidence of Correction/Recommendations	Must be Addressed in CAP
		<p><u>Opportunities for Improvement</u> Professional development and targeted technical assistance from SSTs as an internal monitoring review system would promote compliance in the areas of progress monitoring.</p>	
DS-15	<p><i>OAC 3301-51-07(L) [Development, review and revision of IEP]</i> All applicable IEPs reviewed show evidence that revisions were made based on data indicating changes in student needs or abilities.</p>	<p><u>Individual Correction</u> NA</p> <p><u>Systemic Correction</u> NA</p>	☒ NA
DS-16	<p><i>34 CFR 300.321(5) [IEP team]</i> <i>OAC 3301-51-07(I) [IEP team]</i> One out of 10 IEPs reviewed, or 10%, did not indicate that the IEP Team included a group of qualified professionals.</p>	<p><u>Individual Correction</u> For the IEPs identified as noncompliant, the educational agency must.</p> <ul style="list-style-type: none"> • Provide evidence that the IEP team, including the parent, participated in the IEP meeting; or • Provide evidence that the educational agency made reasonable attempts to include the parent in the IEP meeting; and/or • Provide documentation that the parent and the educational agency consent, in writing, to excuse the required member prior to the IEP meeting; or • Reconvene the IEP team to review the IEP with all required members present. <p><u>Systemic Correction</u> It is recommended that the educational agency review and revise its written procedures and practices regarding the involvement of all required team members, including the parent, in IEP meetings. 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>	☒ No This finding does <u>not</u> need to be addressed in a Corrective Action Plan.

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>One out of 10 IEPs reviewed, or 10%, did not include an explanation of the extent to which the child will not participate with nondisabled children in the general education classroom.</p>	<p><u>Individual Correction</u></p> <p>The educational agency must reconvene the teams of the IEPs identified as noncompliant to review and include a justification as to why the child was removed from the general education classroom.</p> <p>The justification should:</p> <ul style="list-style-type: none"> • Be based on the needs of the child, not the disability. • Reflect that the team has given adequate consideration to meeting the student’s needs in the general classroom with supplementary aids and services. • Document that the nature or severity of the disability is such that education in general education classes, even with the use of supplementary aids and services, cannot be achieved satisfactorily. • Describe potential harmful effects to the child or others, if applicable. <p><u>Systemic Correction</u></p> <p>It is recommended that the educational agency review and revise its 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><input checked="" type="checkbox"/> No This finding does <u>not</u> need to be addressed in a Corrective Action Plan</p>

Additional Considerations and Opportunities for Improvement:

- Gallia County Board of Developmental Disabilities would benefit from developing a new teacher and paraprofessional onboarding process geared toward training new staff members on the district's Special Education Policies, Procedures and Practices including Restraint and Seclusion and PBIS. This would also be beneficial for staff who are working with students that have a behavior intervention plan in place.
- There is opportunity for Gallia County Board of Developmental Disabilities staff to receive technical assistance on the use of sign language and speech communication devices students are using so they can better support students in the school learning environment.