

**Goal Digital Academy
IRN: 149047****Ohio the Department of Education, Office for Exceptional Children
2021 IDEA Monitoring Review Summary Report****Introduction**

The Ohio Department of Education's Office for Exceptional Children would like to extend appreciation to the Goal Digital Academy 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 educational agency. This includes but is not limited to Systemic Correction of records and special education procedures and practices to document ongoing compliance with IDEA requirements.

Overview

The following report is a summary of the onsite review conducted by the Department on March 15 – 19, 2021 as part of its general supervision requirements under the Individuals with Disabilities Education Act (IDEA) and Am. Sub. H.B.1.

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

- Improve educational results and functional outcomes for all students with disabilities; and
- Ensure that the educational agency meets 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

The Department provided the educational agency with a public meeting announcement to post on its website and to mail to parents. Goal Digital Academy mailed 214 letters to all families with students with disabilities in the educational agency regarding the public meeting. Public parent meeting dates for all educational agencies selected for IDEA Monitoring Reviews are also posted on the Department website.

On March 16, 2021, the Department consultants held a public meeting for parents and other interested parties. Two (2) parents and family members and one (1) State Support Team (SST) Region 7 representative 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. One (1) attendee 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-Review Data Analysis

The Department conducted a comprehensive review which included district and grade-level data; Special Education Performance Profile; Ohio School Report Cards; Comprehensive Continuous Improvement Plan (CCIP) and/or One Plan; 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

The Department consultants reviewed 15 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 March 15 and 16, 2021, the Department consultants held five (5) sessions of interviews with seven (7) administrators and nineteen (19) 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) and IEP alignment and Discipline.

Strengths/Commendations:

- It was evident that the staff interviewed were extremely passionate, caring, and dedicated not only to students with disabilities, but the entire student body.
- Goal Digital Academy has developed a mentoring program with Advocates as well as providing mental health services to students who need additional supports to be successful.
- Staff interviewed shared they enjoy working at Goal Digital Academy and they feel supported by one another. Many spoke of great partnerships and good communication between Intervention Specialists and General Education teachers.
- During the interview process, staff were highly complimentary of the Academic Assist Class provided at the Delaware campus that focuses on students with disabilities and the delivery of their specially designed instruction, as well as building personal relationships with those students. Staff shared their desire for this model to be used throughout all the Goal Digital Academy locations.

Findings of Noncompliance/Required Actions

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

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

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

Corrective Action Plan (CAP)

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

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

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

CAP Due Date: October 6, 2021

Department Trainings

As part of the Department monitoring process, Goal Digital Academy 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: October 6, 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 is provided in a separate report.

Individual Correction Due Date: November 17, 2021

CAP Activities and Systemic Correction

The educational agency will provide the Department with documentation verifying the educational agency's completion of all CAP and systemic correction activities 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: June 1, 2022

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 Adriana Golumbeanu, the Department's IDEA Monitoring Contact for this review, at (614) 965-2422, toll-free at (877) 644-6338, or by e-mail at adriana.golumbeanu@education.ohio.gov.

The Department's Review Findings and Educational Agency Required Actions

Component 1: Child Find

Each educational agency shall adopt and implement written policies and procedures approved by the Ohio Department of Education, Office for Exceptional Children, that ensure all children with disabilities residing within the educational agency, regardless of the severity of their disability, and who are in need of special education and related services are identified, located, and evaluated as required by the Individuals with Disabilities Education Improvement Act of 2004 and Federal Regulations at 34 C.F.R. Part 300 pertaining to child find, including the regulations at 34 C.F.R. 300.111 and 300.646 and Rule 3301-51-03 of the Ohio Operating Standards serving Children with Disabilities.

Record Review Item	Evidence of Findings	Evidence of Corrections/Recommendations	Must be addressed in CAP
CF-1	<p>Record Review</p> <p>34 CFR 300.305(a) [Review of Existing evaluation data] and OAC 3301-51-11 (c)(1)(a) [Preschool children eligible for special education]</p> <p>Preschool records were not reviewed.</p>	<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>
CF-2	<p>Record Review</p> <p>OAC 3301-51-06 [Evaluations]</p> <p>Nine out of 15, or 60% 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><input checked="" type="checkbox"/> Yes</p> <p>The educational agency needs to address this finding in a Corrective Action Plan.</p>
	<p>Interviews/Public Comments</p> <p>Through interviews, it was noted that the Response to Intervention (RTI) process for Goal Digital is not clearly known across all grade levels and in all buildings. Interview participants confirmed that, although interventions are provided through various processes across the educational agency, the results are not uniformly documented.</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>Concerns Noted</p> <p>Frequently, the initial ETRs did not contain a summary of interventions implemented to include description, intensity, time and results. The educational agency must provide a summary of actual interventions and not simply a list of possible accommodations. For reevaluations, if no additional interventions were provided, noting that the team agreed the current IEP supports and services are suitable to meet the student's needs will suffice.</p>	<p>Goal Digital Academy would benefit from reviewing and revising their RTI processes. Once revised, the educational agency would benefit from providing professional learning to all staff on the process and procedures. Monitoring from administrative staff would be beneficial to ensure there is consistency in the implementation of the processes and procedures. Additionally, Goal Digital would benefit from technical assistance from SST 7 on how to accurately document interventions in Part 2 of the Evaluation Team Report.</p>	

Record Review Item	Evidence of Findings		Evidence of Corrections/Recommendations	Must be addressed in CAP
CF-3	Record Review	<p>34 CFR 300.501(b) [Parent participation in meetings] and OAC 3301-51-06 (E)(2)(a) [Evaluation procedures].</p> <p>Three out of 15, or 20% of student records reviewed 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 not need to address this finding in a Corrective Action Plan.</p>
	Interviews/Public Comments	Interviewees described coordinated efforts to communicate with parents and involve them in their children's educational process wherever possible.		
	Concerns Noted			
CF-4	Record Review	<p>34 CFR 300.300 [Parental Consent]</p> <p>Five out of the eight applicable student records reviewed, or 63%, did not provide evidence of parental consent obtained prior to new testing.</p>	<p><u>Individual Correction</u></p> <p>The educational agency must provide evidence that the parent provided informed, written consent for evaluation, based upon the planning form. Or the agency must show documented repeated attempts to obtain informed, written consent to which the parent did not respond.</p> <p>The evidence may include prior written notice, parent invitation, communication log, or other documented attempts to obtain parental informed, written consent.</p> <p>If the educational agency cannot provide documentation that the parent provided informed, written consent for evaluation, or did not respond to repeated attempts to obtain consent, the agency must conduct a reevaluation including documentation of parental consent.</p>	<p><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	Parents must give informed, written consent for any new assessment of their student for purposes of evaluating or reevaluating eligibility for special education services. If written consent is given electronically, that documentation needs to be included in the ETR paperwork.		

Record Review Item	Evidence of Findings		Evidence of Corrections/Recommendations	Must be addressed in CAP
			<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> There is an opportunity for Goal Digital to strengthen the policies and practices on obtaining written, informed consent for evaluations.</p>	
CF-5	Record Review	<p>34 CFR 300.304(c)(4) [Other evaluation procedures] OAC 3301-51-01 [Applicability of requirements and definitions] and 3301-51-06 (E)(2)(a) [Evaluation procedures]</p> <p>Fifteen (15) out of the 15, or 100% of the evaluations reviewed did not provide evidence that the evaluation addresses all areas related to the suspected disability.</p>	<p><u>Individual Correction</u> 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> 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> It is recommended that Goal Digital Academy develop an internal procedure to monitor the assessments indicated on the planning form to ensure that they are completed as noted by the team and included in the Part 1 Individual Evaluator's Assessment Reports of each ETR.</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>Staff members stated that it can be difficult to complete a Part 1 Individual Evaluators Assessment page when they do not know the child well.</p>		
	Concerns Noted	<p>In many cases, the ETR planning page listed assessments for the evaluation process that were not included in the ETR Part 1 Individual Evaluators Assessment pages.</p>		

Record Review Item	Evidence of Findings		Evidence of Corrections/Recommendations	Must be addressed in CAP
CF-6	Record Review	<p>34 CFR 300.306(c) [Procedures for determining eligibility and educational need]</p> <p>Nine out of 15, or 60% of the 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>	<input checked="" type="checkbox"/> Yes <p>The educational agency needs to address this finding in a Corrective Action Plan.</p>
	Interviews/Public Comments		<p><u>Systemic Correction</u></p> <p>The educational agency must submit evidence to the Department of written procedures and practices regarding summary of data and assessment results.</p>	
	Concerns Noted	<p>Information included in the summary was sometimes copied and pasted from Part 1 Individual Evaluator's Assessment and not summarized in a clear and concise manner for the parent/guardian to understand or for the IEP team to develop an actionable IEP. All Part 1 information must be summarized in Part 2 even if it was determined that the area in which the evaluation assessed was not impacting student performance.</p>	<p><u>Opportunities for Improvement</u></p> <p>Goal Digital Academy has an opportunity to develop an internal practice that will monitor the completion of the Part 2 Summary of the Evaluation Team Report so that all areas assessed in a Part 1 Individual Evaluator's Assessment are summarized in the Part 2 Summary. This is an opportunity for professional development and/or targeted technical assistance from SST 7.</p>	
CF-7	Record Review	<p>34 CFR 300.306(c) [Procedures for determining eligibility and educational need]</p> <p>Twelve (12) out of 15, or 80% of the 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>	<input checked="" type="checkbox"/> Yes <p>The educational agency needs to address this finding in a Corrective Action Plan.</p>
	Interviews/Public Comments		<p><u>Systemic Correction</u></p> <p>The educational agency must submit evidence to the Department of written procedures and practices regarding description of educational needs.</p>	
	Concerns Noted	<p>In several records, educational needs were stated in Part 1 but were not included in the Part 2 summary of needs. Educational needs should be written in a way, and include enough information, that allows for them to be used by the IEP team to develop meaningful and actionable goals and services.</p>	<p><u>Opportunities for Improvement</u></p> <p>Goal Digital Academy has an opportunity to develop an internal procedure that will assist staff in monitoring the completion of the Part 2 Summary of Educational Needs so that the educational needs</p>	

Record Review Item	Evidence of Findings	Evidence of Corrections/Recommendations	Must be addressed in CAP
		listed in a Part 1 Individual Evaluator's Assessment are summarized in the Part 2 Summary of Educational Needs. This is an opportunity for professional development and/or targeted technical assistance from SST 7.	
CF-8	Record Review	<p>34 CFR 300.306(c) [Procedures for determining eligibility and educational need]</p> <p>Six out of 15, or 40% of the evaluation team reports reviewed did not contain specific implications for instruction.</p>	<input checked="" type="checkbox"/> Yes The educational agency needs to address this finding in a Corrective Action Plan.
	Interviews/Public Comments		
	Concerns Noted	In some records, the implications for instruction were generic in nature and not specific to the needs of the child.	
CF-9	Record Review	<p>34 CFR 300.306(a)(1) [Determination of eligibility] OAC 3301-51-01 (B)(21) [Applicability of requirements and definitions]</p> <p>Two out of 15, or 13% of the 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>	<input checked="" type="checkbox"/> No The educational agency does not need to address this finding in a Corrective Action Plan.
	Interviews/Public Comments		
	Concerns Noted		

Record Review Item	Evidence of Findings		Evidence of Corrections/Recommendations	Must be addressed in CAP
CF-10	Record Review	<p><i>OAC 3301-51-01 (B)(10) [Definitions] and 3301-51-06 [Evaluations]</i></p> <p>Fourteen (14) out of 15, or 93% of the evaluations reviewed did not provide a justification for the eligibility determination decision.</p>	<p><u>Individual Correction</u> The educational agency will reconvene the ETR teams to conduct a reevaluation and provide a clear justification for the eligibility determination.</p> <p><u>Systemic Correction</u> The educational agency must submit evidence to the Department of written procedures and practices regarding the eligibility determination decision.</p> <p><u>Opportunities for Improvement</u> Goal Digital Academy has the opportunity to participate in professional development and/or targeted technical assistance in determining special education eligibility. This training should include how to document how the disability affects the student and their progress in the general education curriculum.</p>	<p><input checked="" type="checkbox"/> Yes</p> <p>The educational agency needs to address this finding in a Corrective Action Plan.</p>
	Interviews/Public Comments			
	Concerns Noted	<p>In many cases, the evaluations did not provide a justification statement that included how the disability affects the student's progress in the general education curriculum and how the student specifically meets the eligibility criteria.</p>		

Component 2: Delivery of Services

Each educational agency shall have policies, procedures and practices to ensure that each child with a disability has an IEP that is developed, reviewed, and revised in a meeting and implemented in accordance with 300.320 through 300.324.

Record Review Item	Evidence of Findings		Evidence of Correction/Recommendations	Must be addressed in CAP
DS-1	Record Review	<p>SPP Indicator 13 34 CFR 300.320(b) [Transition services] OAC 3301-51-07 (H)(2) [Definition of individualized education program]</p> <p>Twelve (12) out of the 13 applicable IEPs reviewed, or 92%, did not show evidence that the postsecondary transition plan met all eight required elements of the IDEA for the student, specifically in the following area(s):</p> <ol style="list-style-type: none"> 1. There are appropriate measurable postsecondary goal(s). 2. The postsecondary goals are updated annually. 3. The postsecondary goals were based on age-appropriate transition assessment (AATA). 4. There are transition services that will reasonably enable the student to meet the postsecondary goal(s). 5. The transition services include courses of study that will reasonably enable the student to meet the postsecondary goal(s). 6. The annual goal(s) are related to the student's transition service needs. 7. There is evidence the student was invited to the IEP Team Meeting where transition services were discussed. 8. When appropriate, there is evidence that a representative of any participating agency was invited to the IEP Team Meeting. 	<p><u>Individual Correction</u> 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> The educational agency must submit evidence to the Department of written procedures and practices regarding transition services.</p> <p><u>Opportunities for Improvement</u> Training and technical assistance should be provided to all ETR and IEP members responsible for assessing and writing transition plans to ensure they are compliant and beneficial to the student.</p> <p>Goal Digital Academy 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>

Record Review Item	Evidence of Findings		Evidence of Correction/Recommendations	Must be addressed in CAP
	Interviews/Public Comments	During interviews, general post-secondary activities were discussed by staff such as Financial Literacy and career classes offered within the educational agency. Special educators spoke of Ohio Means Jobs and transition assessments but there were no specifics provided on targeted transition services and activities for students with disabilities (that differs from what is provided for all students). It was also mentioned that outside providers are not always included or considered such as Opportunities for Ohioans with Disabilities (OOD). Staff expressed this is an area that needs improvement, and they think a Transition Coordinator would be helpful.		
	Concerns Noted	There is an opportunity to strengthen the development of IEP transition services by conducting thorough, relevant and comprehensive Age-Appropriate Transition Assessments so that services are individualized based upon each student's needs, strengths, interests and preferences. Several records included transition services stating what the student will do. Services should be initiated and provided by the educational agency, above and beyond what is offered in the general education curriculum.		
DS-2	Record Review	34 CFR 300.320(a)(1) [Definition of individualized education program] Fifteen (15) out of 15, or 100% of the IEPs reviewed did not contain Present Levels of Academic Achievement and Functional Performance (PLOP) that addressed the needs of the student.	<u>Individual Correction</u> 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: <ul style="list-style-type: none"> • Summary of current daily academic/ behavior and/ or functional performance (strengths and needs) compared to expected grade level standards in order to provide a frame of reference; 	<input checked="" type="checkbox"/> Yes The educational agency needs to address this finding in a Corrective Action Plan.

Record Review Item	Evidence of Findings		Evidence of Correction/Recommendations	Must be addressed in CAP
	Interviews/Public Comments		<ul style="list-style-type: none"> • PLOP must relate to the goal measurement • Baseline data provided for developing a measurable goal. <p><u>Systemic Correction</u> 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> There is the opportunity for Goal Digital Academy to develop an Internal Monitoring team that will review and monitor the PLOP to ensure it addresses the individual needs of the student and aligns to the condition, behavior/skill and performance criteria of the measurable annual goal. Technical assistance can be of benefit in helping service providers identify means of obtaining student present levels of performance.</p>	
	Concerns Noted	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.		
DS-3	Record Review	<p>34 CFR 300.320(a)(2)(i) [Definition of individualized education program]</p> <p>Thirteen (13) out of 15, or 87% of the IEPs reviewed did not contain measurable annual goals.</p>	<p><u>Individual Correction</u> The educational agency must reconvene the teams of the IEPs identified as noncompliant to review and amend 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> The educational agency must submit evidence to the Department of written procedures and practices regarding the development of measurable annual IEP goals.</p>	<input checked="" type="checkbox"/> Yes The educational agency needs to address this finding in a Corrective Action Plan.
	Interviews/Public Comments			
	Concerns Noted	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.		

Record Review Item	Evidence of Findings		Evidence of Correction/Recommendations	Must be addressed in CAP
			<p><u>Opportunities for Improvement</u> There is the opportunity for Goal Digital Academy 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/skill and performance criteria.</p>	
DS-4	Record Review	<p>34 CFR 300.320(a)(2)(i) [Definition of individualized education program] Five (5) out of the 14 applicable IEPs reviewed, or 36%, 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>	<input checked="" type="checkbox"/> Yes The educational agency needs to address this finding in a Corrective Action Plan.
	Interviews/Public Comments		<p><u>Systemic Correction</u> The educational agency must submit evidence to the Department of written procedures and practices regarding the IEP process of addressing identified academic needs.</p>	
	Concerns Noted	<p>Some records indicated academic needs in the current ETR or IEP profile; however, these needs were not addressed in the IEP. If the IEP team has determined there is no longer a need in these areas, a statement to this effect would need to be included.</p>	<p><u>Opportunities for Improvement</u> There is an opportunity for professional development and targeted technical assistance in documenting academic needs addressed in the ETR. If academic needs were listed in the ETR or IEP profile as being an area of concern, they must be addressed in the IEP in some capacity. The academic need can either be addressed through services and/or supports or a statement that indicates the team has prioritized needs or found that it is not an area of concern at this time.</p>	

Record Review Item	Evidence of Findings		Evidence of Correction/Recommendations	Must be addressed in CAP
DS-5	Record Review	<p>34 CFR 300.320(a)(2)(i) [Definition of individualized education]</p> <p>Seven out of the 14 applicable IEPs reviewed, or 50%, 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><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><u>Systemic Correction</u></p>	
	Concerns Noted	<p>Some records indicated functional needs (such as behavior, mental health concerns, attendance, etc.) in the current ETR or IEP profile; however, these needs were not addressed in the IEP. If the IEP team has determined there is no longer a need in these areas, a statement to this effect would need to be included.</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><u>Opportunities for Improvement</u></p> <p>This is an opportunity for professional development and targeted technical assistance in writing compliant IEPs that document all functional needs identified in the ETR. If functional needs were listed in the ETR or IEP profile as being an area of concern, they must be addressed in the IEP in some capacity. The functional need can either be addressed through services and/or supports or a statement that indicates the team has prioritized needs or found that it is not an area of concern at this time.</p>	
DS-6	Record Review	<p>34 CFR 300.320(a)(4) [Definition of individualized education program] OAC 3301-51-07 (H)(1)(e)(i) [Definition of IEP]</p> <p>Eleven (11) out of 15, or 73% of IEPs reviewed did not contain a statement of specially designed instruction including related services that addresses the individual needs of the child and supports the annual goals.</p>	<p><u>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><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><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>	

Record Review Item	Evidence of Findings		Evidence of Correction/Recommendations	Must be addressed in CAP
	Concerns Noted	Statements were vague or unclear to the nature of the instruction that aligns with the need(s) of the child and support achievement of annual goals. Many records evidenced lack of individualization and specificity that would make this instruction specialized.	<p><u>Opportunities for Improvement</u></p> <p>Goal Digital Academy would benefit from professional learning and technical assistance in understanding what SDI is and how to develop SDI based upon each student's specific academic and/or functional needs. Additionally, the staff who develop IEPs would benefit from professional learning on how to complete Section 7, providing clear statements of SDI which describe the nature of instruction that aligns to the individual needs of the student and supports achievement of the measurable annual goals. SDI should describe skills and methods used in the instruction of the measurable annual goals.</p> <p>An internal monitoring and review system would also be very helpful to promote compliance.</p>	
DS-7	Record Review	<p>34 CFR 300.320(a)(7) [Definition of individualized education program] OAC 3301-51-07 (H)(1)(i) [Definition of IEP]</p> <p>Fourteen (14) out of 15, or 93% 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"/> Yes The educational agency needs to address this finding in a Corrective Action Plan.
	Interviews/Public Comments	Intervention specialists report students can receive instruction in person by coming to the lab, or they can receive services through the virtual platforms.	<p><u>Opportunities for Improvement</u></p> <p>Training and technical assistance from SST 7 as well as an internal monitoring review system would be very helpful to promote compliance in the areas of specially designed instruction, including documenting the location of the provision of SDI.</p>	
	Concerns Noted	At times, the location for instruction was not clear or indicated two locations. Many records indicated "lab" or "online" and it is unclear where/when the actual SDI is being delivered. The IEP team should determine the most appropriate location for services to be received and then document it clearly in the IEP. "Online/lab" does not indicate if this is a general education or a special education environment.		

Record Review Item	Evidence of Findings		Evidence of Correction/Recommendations	Must be addressed in CAP
DS-8	Record Review	<p>34 CFR 300.320(a)(7) [Definition of individualized education program] OAC 3301-51-07 (H)(1)(i) [Definition of IEP]</p> <p>Three out of 15, or 20% 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 not need to address this finding in a Corrective Action Plan.
	Interviews/Public Comments			
	Concerns Noted			
DS-9	Record Review	<p>34 CFR 300.324(a)(2)(v) [Development of IEP] OAC 3301-51-01(B)(3) [Applicability of requirements and definitions]</p> <p>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></p> <p>NA</p> <p><u>Systemic Correction</u></p> <p>NA</p>	<input checked="" type="checkbox"/> NA
DS-10	Record Review	<p>34 CFR 300.320(a)(6)(i) [Definition of individualized education] OAC 3301-51-07 (H)(1)(g) [Definition of IEP]</p> <p>Thirteen (13) out of the 13 applicable IEPs reviewed, or 100%, did not identify accommodations provided to enable the child to be involved and make progress in the general education curriculum.</p>	<p><u>Individual Correction</u></p> <p>The educational agency must reconvene the teams of the IEPs identified as noncompliant to review the accommodations that would directly assist the child to access the course content without altering the scope or complexity of the information taught and include them on the IEP.</p> <p><u>Systemic Correction</u></p> <p>The educational agency must submit evidence to the Department of written procedures and practices regarding accommodations.</p> <p><u>Opportunities for Improvement</u></p> <p>Training from SST 7 as well as an internal monitoring review system would be very helpful to promote compliance in the area of accommodations.</p>	<input checked="" type="checkbox"/> Yes The educational agency needs to address this finding in a Corrective Action Plan.
	Interviews/Public Comments			
	Concerns Noted	The condition(s) and/or extent was not clearly explained (who provided the services and when and where those services were provided).		

Record Review Item	Evidence of Findings		Evidence of Correction/Recommendations	Must be addressed in CAP
DS-11	Record Review	<p>34 CFR 300.320(a)(4) [Definition of individualized education program] OAC 3301-51-07 (H)(1)(e) [Definition of IEP]</p> <p>Eight out of the eight applicable IEPs reviewed, or 100%, 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></p> <p>The educational agency must reconvene the teams of the IEPs identified as noncompliant to review the modifications that would alter the amount or complexity of grade-level materials and would enable the child to be involved and make progress in the general education curriculum and include them in the IEP.</p> <p><u>Systemic Correction</u></p> <p>The educational agency must submit evidence to the Department of written procedures and practices regarding modifications.</p> <p><u>Opportunities for Improvement</u></p> <p>This area is an opportunity for professional development and/or targeted technical assistance to address the content that students are expected to learn where amount or complexity of materials are altered from grade-level curriculum expectations. When an instructional or curriculum modification is made, either the specific subject matter is altered, or the performance expected of the student is changed.</p>	<input checked="" type="checkbox"/> Yes <p>The educational agency needs to address this finding in a Corrective Action Plan.</p>
	Interviews/Public Comments	<p>During interview sessions, “modifications” were mentioned, or the term “modifications” was used that indicated a lack of understanding of what a modification is.</p>		
	Concerns Noted	<p>In some records, modifications were written that were an accommodation. There is some concern that the term “modifications” may be misunderstood, and students are really receiving accommodations or differentiated instruction and not a modified curriculum.</p>		
DS-12	Record Review	<p>34 CFR 300.320(a)(4) [Definition of individualized education program] OAC 3301-51-07 (H)(1)(e) [Definition of IEP]</p> <p>There were no applicable IEPs reviewed that 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>NA</p> <p><u>Systemic Correction</u></p> <p>NA</p>	<input checked="" type="checkbox"/> NA
DS-13	Record Review	<p>OAC 3301-51-07 (H)(1)(h)(ii) [Definition of IEP]</p> <p>One out of the one applicable student record 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>Individual Correction</u></p> <p>The educational agency must reconvene the team of the IEP identified as noncompliant to review and determine if the alternate assessment is appropriate for the student.</p>	<input checked="" type="checkbox"/> Yes <p>The educational agency needs to address this finding in a Corrective Action Plan.</p>

Record Review Item	Evidence of Findings		Evidence of Correction/Recommendations	Must be addressed in CAP
	Interviews/Public Comments		<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. <u>Opportunities for Improvement</u> Training and technical assistance regarding the AASCD Decision-Making Tool would help staff understand why the tool is used and ensure it is used when deciding what assessments the student will take.	
	Concerns Noted	The record did not include evidence that the IEP Team used the required AASCD Decision-Making Tool with evidence of a significant cognitive disability.		
DS-14	Record Review	<p><i>OAC 3301-51-07(L)(2) [Development, review and revision of IEP]</i></p> <p>Eight out of the 14 applicable student records reviewed, or 57%, did not show evidence of progress reporting data collected and analyzed to monitor performance on each goal.</p>	<u>Individual Correction</u> None <u>Systemic Correction</u> The educational agency must submit evidence to the Department of written procedures and practices regarding measurable annual goals and services consistent with progress made. <u>Opportunities for Improvement</u> Training from SSTs as well as an internal monitoring review system would be very helpful to promote compliance in the areas of progress monitoring.	<input checked="" type="checkbox"/> Yes The educational agency needs to address this finding in a Corrective Action Plan.
	Interviews/Public Comments	<p>One comment at the parent public meeting indicated that Goal Digital Academy did not provide progress reports until the parent requested them.</p> <p>During the interviews, related service providers shared they had an online system where they track the SDI minutes as well as the progress their students are making.</p>		
	Concerns Noted	Even though progress was being gathered and reported, it must be recorded using the same performance criteria defined in the annual measurable goal. Progress Reports on annual measurable goals must be provided to parents of a child with a disability at least as often as report cards are issued to all children. If the educational agency provides interim reports to all children, progress reports must be provided to all parents of a child with a disability at the interim as well.		

Record Review Item	Evidence of Findings		Evidence of Correction/Recommendations	Must be addressed in CAP
DS-15	Record Review	<p>OAC 3301-51-07(L) [Development, review and revision of IEP]</p> <p>Three out of the three applicable IEPs review, or 100%, did not show evidence that revisions were made based on data indicating changes in student needs or abilities.</p>	<p><u>Individual Correction</u></p> <p>The educational agency must reconvene the teams to review and amend the IEPs to reflect changes made based on current needs or abilities.</p> <p><u>Systemic Correction</u></p> <p>The educational agency must submit evidence to the Department of written procedures and practices regarding using data to revise IEPs based on changes in student needs or abilities.</p> <p><u>Opportunities for Improvement</u></p> <p>Through the review of records and progress reports, it appears Goal Digital Academy special education staff is not familiar with the IEP amendment process. Goal Digital Academy can address this issue by providing additional training through SST 7.</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 some records progress notes indicate one or more goals were met; however, there was no indication that the IEP team was reconvened to consider the need to revise and develop new goals based upon current student needs.</p>		
DS-16	Record Review	<p>34 CFR 300.321(5) [IEP team] OAC 3301-51-07(I) [IEP team]</p> <p>Four out of 15, or 27% 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"> • Provide documentation that the parent was informed prior to the IEP meeting that the person qualified to interpret the instructional implications of evaluation results would not participate in the meeting, and • Provide a written excuse signed by the parents and the educational agency that allowed the person qualified to interpret the instructional implications of evaluation results not to be in attendance at the IEP meeting, or • Reconvene the IEP team to review the IEP with all required members present. <p><u>Systemic Correction</u></p> <p>The educational agency must submit evidence to the Department of written procedures and practices regarding the involvement of people qualified to interpret the instructional implications of evaluation results in the IEP process.</p>	<p><input checked="" type="checkbox"/> No</p> <p>The educational agency does not need to address this finding in a Corrective Action Plan.</p>
	Interviews/Public Comments			
	Concerns Noted	<p>There were records where the dates entered on the signature page of the IEP did not match. Records were missing educational agency representative and parent signatures.</p>		

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

Each educational agency shall ensure that to the maximum extent appropriate, children with disabilities, including children in public or nonpublic institutions or other care facilities, are educated with children who are nondisabled; and that a continuum of alternative placements is available to meet the needs of children with disabilities for special education and related services.

Record Review Item	Evidence of Findings	Evidence of Correction/Recommendations	Must be addressed in CAP
LRE-1	<p>Record Review</p> <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>Thirteen (13) out of the 13 applicable IEPs reviewed, or 100%, did not include an explanation of the extent to which the child will not participate with nondisabled children in the general education classroom.</p>	<p><u>Individual Correction</u></p> <p>The educational agency must reconvene the teams of the IEPs identified as noncompliant to review and include a justification as to why the child was removed from the general education classroom.</p> <p>The justification should:</p> <ul style="list-style-type: none"> • Be based on the needs of the child, not the disability. • Reflect that the team has given adequate consideration to meeting the student's needs in the general classroom with supplementary aids and services. • Document that the nature or severity of the disability is such that education in general education classes, even with the use of supplementary aids and services, cannot be achieved satisfactorily. • Describe potential harmful effects to the child or others, if applicable. <p><u>Systemic Correction</u></p> <p>The educational agency must submit evidence to the Department of written procedures and practices regarding the least restrictive environment placement decision process.</p> <p><u>Opportunities for Improvement</u></p> <p>Goal Digital Academy will benefit from training from SST 7 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</p>	<p><input checked="" type="checkbox"/> Yes</p> <p>The educational agency needs to address this finding in a Corrective Action Plan.</p>
	<p>Interviews</p> <p>Through interviews and IEP Verifications, it was difficult to determine where the specially designed instruction was supposed to take place as many IEPs listed two locations in section 7.</p> <p>During interviews, teachers shared that sometimes they (the IS) and the General Education teachers help one another and both work with the student which makes it confusing as to who is delivering SDI.</p>		
	<p>Concerns Noted</p> <p>Many of the reviewed IEPs did not provide a justification statement as to why the student could not be served in the general education setting. This statement must be based upon individual student needs. This statement must also match the location listed in Section 7 for specially designed instruction.</p>		

Record Review Item	Evidence of Findings		Evidence of Correction/Recommendations	Must be addressed in CAP
			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 listed in section 7 of the IEP.	

Opportunities for Improvement:

- Develop a formal process of tracking specially designed instruction (SDI) to ensure a Free Appropriate Public Education (FAPE) for students.
- Progress Monitoring: Progress Monitoring is extremely important in creating IEPs that are best suited for individual student needs. There is a need for professional development regarding what must be monitored, how that information connects to student need, and the tracking of progress toward annual IEP goals. Procedures should be developed to ensure parents/guardians receive the progress updates for their child.
- There is a need for Goal Digital Academy to examine practices regarding documentation of student needs in the IEP, which is detailed in the record review summary. During IEP verifications, the OEC review team was often unable to determine if the Specially Designed Instruction as written in the IEP was being delivered. There is confusion as to where the SDI was supposed to be given (in a lab or online). Goal Digital should consider how they can improve documentation of student needs more thoroughly within the IEP and ensure the information in Section 7 of the IEP matches what is also written in the Least Restrictive Environment section.
- There is an opportunity for improvement for Goal Digital regarding attendance policies, procedures, and practices. What is the procedure for staff to follow when students do not attend their virtual learning opportunities or lab sessions? When is the mentor/advocate involved and what exactly is their role? When, how often, and in what way are parents involved in these plans? When are attendance letters sent out, attendance contracts or plans created, and who is responsible for monitoring and following up with the plans?
- With the large turnover of students, there is a need for Goal Digital Academy to develop a formal process of adopting special education records from out of district or state. During interviews, staff indicated they would like to be consulted more regarding students who move into the educational agency. This will help to ensure that students are receiving services and supports based upon their individualized needs and that records are compliant.
- There is an opportunity for Goal Digital Academy to enhance their Response to Intervention (RTI) process by incorporating common language and processes and procedures across all buildings. Additionally, Goal Digital Academy could benefit from research to select evidence-based interventions (academic skill and/or behavior specific) along with decision rules for all Tier 2 and 3 interventions.
- During the interview sessions, teachers indicated professional development (PD) opportunities are easily accessible and encouraged. It would be beneficial for Goal Digital Academy staff to attend PD offerings by SST 7 to stay up to date and current on Special Education law, best practices, and guidance.