

Jefferson Township Local School District
IRN: 048686

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 Jefferson Township Local School District staff for their efforts, attention and time committed to the completion of the review process.

Definition of terms in this document:

Individual Corrections or Record Corrections refers to the correction of Individualized Education Programs (IEPs), Evaluation Team Reports (ETRs) and other special education records that were reviewed by the Department and found to be 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 April 10 and 11, 2024, as part of its general supervision requirements under the Individuals with Disabilities Education Act (IDEA).

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

- Improve educational results and functional outcomes for all students with disabilities; and
- Ensure that educational agencies meet program requirements under Part B of IDEA, particularly those requirements that are most closely related to improving educational results for students with disabilities.

Onsite reviews are targeted to include the following specific areas:

- Child Find;
- Delivery of Services;
- Least Restrictive Environment;
- IEP Verification of Delivery of Services;
- Parent Input; and
- Teacher, Special Education Service Providers and Administrator Interviews.

Data Sources

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

1. Parent Input

Jefferson Township Local School District mailed 72 letters of the Department's notification of review to all families with students with disabilities enrolled in the educational agency. The educational agency posted the notification of review on its website which included a link to a recorded presentation from the Department providing an overview of the monitoring review process. The presentation also provides contact information and requests parents to provide comments to the Department regarding the special education program in their school. The notification of review was also posted on the Department's website.

The Department received comments from two parents.

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 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

Prior to the onsite visit, 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. Seven student records were selected for IEP verification in the classroom setting. Due to students enrolled in remote education platforms, the team was limited to selected students in the buildings. Jefferson Township staff were accommodating and flexible and allowed our team to sit in on Specially Designed Instruction (SDI).

4. Staff/Administrative Interviews

On April 10, 2024, the Department consultants held seven sessions of interviews with seven administrators and 24 teachers, school counselors, 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 Jefferson Township Local staff are passionate and willing to be flexible in helping other teachers with coverage and subbing. There seems to be a good rapport and support among all staff members.
- Many of the staff members have over 25 years of experience.
- Jefferson Township Local schedules monthly professional development days for team building.
- The Jefferson Township Local administration is motivated to make changes to support students' educational success.

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 Robert.Schamel@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 Development Due Date: N/A The Department will be providing a directed CAP.

Department Trainings

As part of the Department monitoring process, Jefferson Township Local School District personnel, as identified by the Department, are required to complete the OEC Required Special Education Essentials training modules within the Learning Management System (LMS). These training modules must be completed within 30 school days from the date of this report. 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.

Completion of LMS Training Modules Due Date: September 26, 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: November 12, 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 corrections through the review of this documentation and a review of additional student records.

Completion of CAP Activities and Systemic Correction Due Date: May 22, 2025

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

For questions regarding the review, please contact: Rob Schamel, the Department's IDEA Monitoring Contact, at 614-784-5497, toll-free at (877) 644-6338, or by e-mail at robert.schamel@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><u>OAC 3301-51-06 [Evaluations]</u></p> <p>Two out of 15 evaluations reviewed, or 13%, 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 supports provided prior to completion of the initial and reevaluation team report. The Department will verify 100% compliance in this area through a review of new records that have been written after all trainings have been completed.</p>	<p><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><u>34 CFR 300.501(b) [Parent participation in meetings] and OAC 3301-51-06 (E)(2)(a) [Evaluation procedures].</u></p> <p>Four out of 15 student records reviewed, or 27%, did not show evidence that the parent was afforded the opportunity to participate in the evaluation team planning meeting.</p> <p><u>Interviews</u></p> <p>Staff expressed frustration at the lack of consistency of parent participation in meetings.</p> <p><u>Concerns Noted</u></p> <p>For the most part, the OP-9 form documented the attempts to communicate with the parent/guardian. However, it is important to remember to try different modes of communicating or even a visit to the parent/guardian. Also, it was noted that two Planning Forms were missing.</p>	<p><u>Individual Correction</u></p> <p>The educational agency must provide evidence that the parent was involved or provided the opportunity to participate in the evaluation planning process. The evidence may include evaluation planning form, prior written notice, parent invitation, referral form or communication log.</p> <p><u>Systemic Correction</u></p> <p>It is recommended that the educational agency review and revise its written procedures and practices to 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>

Record Review Item	Evidence of Findings	Evidence of Corrections/Recommendations	Must be Addressed in CAP
		<p><u>Opportunities for Improvement</u></p> <p>This process could be strengthened in the documentation phase by instituting a written, school-wide policy that includes what steps should be taken when a parent cannot be reached, including documenting attempts to reach the parent through an OP-9, using multiple modes of contact as well as a variety of times for attempted contact. For parents/guardians that are difficult to meet with in-person, or who struggle to use e-signatures, a paper copy of the Planning Form and PR-05 can be sent home to be signed, and the guardian can take a picture of their signature and text or email it back to the school.</p>	
CF-4	<p><u>34 CFR 300.300 [Parental Consent]</u></p> <p>Six out of 15 student records reviewed, or 40%, did not provide evidence of parental consent obtained prior to evaluation.</p> <p><u>Interviews</u></p> <p>Administrators noted frustration in obtaining parent consent. Jefferson Township Local attempted to obtain signatures in a variety of modes (i.e. sending documents home, email, and going to the home site.) However, the response and outcomes were inconsistent. At times it was noted that parents will not sign for Functional Behavioral Assessments (FBAs).</p> <p><u>Concerns Noted</u></p> <p>Due to staff shortages, administrators and teachers are tasked with other responsibilities such as subbing that interrupt focus on job position priorities such as consistent communication with parents leading up to the ETR review. Documentation of attempts on OP-9's was inconsistent.</p> <p>Participation and required signatures can be documented via email attachment, standard mail, scanned document, photograph of the signature or any other electronic means, and the method of ETR team review and signature collection should be documented in a prior written notice form (PR-01).</p>	<p><u>Individual Correction</u></p> <p>The educational agency must provide evidence that the parent 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><u>Systemic Correction</u></p> <p>The educational agency must submit evidence to the Department of written procedures and practices for obtaining informed parental consent.</p> <p>Jefferson Township must develop an internal monitoring process which contains procedures to ensure written informed parental consent is obtained prior to an evaluation.</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>The Department will verify 100% compliance in this area through a review of new records that have been written after all trainings have been completed.</p> <p><u>Opportunities for Improvement</u></p> <p>There is an opportunity for Jefferson Township Local to strengthen the policies and practices on obtaining written, informed consent for evaluations.</p>	
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>Fifteen (15) out of 15 evaluations reviewed, or 100%, did not provide evidence that the evaluation addresses all areas related to the suspected disability.</p> <p><u>Interviews</u></p> <p>General education teachers expressed frustration at not having access to ETRs and IEPs.</p> <p><u>Concerns Noted</u></p> <p>From the records reviewed, it was noted that the planning forms were either missing components or not properly labeled.</p> <ul style="list-style-type: none"> Evaluations marked on the planning form were not included in a corresponding Part 1. “School Team” was listed rather than the title of the person responsible. The parent should not be listed as person responsible. The Data from Interventions was marked “N/A”, but a Part 1 had been completed in this area. Part 1 was missing required components (such as a dated signature from the assessor, or the Implications for Instruction section). Two planning forms were missing. 	<p><u>Individual Correction</u></p> <p>The educational agency will convene the ETR teams to conduct a reevaluation and provide evidence that the evaluation addresses all areas related to the suspected disability.</p> <p><u>Systemic Correction</u></p> <p>The educational agency must submit evidence to the Department of written procedures and practices to provide evidence that the evaluation addresses all areas related to the suspected disability.</p> <p>Jefferson Township must develop an internal monitoring process to ensure that the evaluation addressed all areas related to the suspected disability.</p> <p>The Department will verify 100% compliance in this area through a review of new records that have been written after all trainings have been completed.</p> <p><u>Opportunities for Improvement</u></p> <p>There is an opportunity 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
	<p>Several records did not include an observation. Per the 2018 memo regarding observations for reevaluations, all initial and reevaluations (for any and all suspected disabilities) must include an observation on the planning form. The observation should be marked as either “sufficient data available” or “additional testing needed.”</p>		
CF-6	<p>34 CFR 300.306(c) [Procedures for determining eligibility and educational need]</p> <p>Five out of 15 evaluations reviewed, or 33%, did not show evidence of clearly stating the summary of assessment results.</p> <p><u>Interviews</u></p> <p>Staff indicated a need for professional development/technical assistance in completing the Part 1s with all the required elements.</p> <p><u>Concerns Noted</u></p> <p>In the records noted for noncompliance in this area, the two concerns observed were:</p> <ul style="list-style-type: none"> • All areas listed on the planning form were not represented in a Part 1 and summarized within a Part 2. • The overall Part 2 Summary did not include enough specific information from the corresponding Part 1s to create an actionable IEP. 	<p><u>Individual Correction</u></p> <p>The educational agency will reconvene the ETR teams to conduct a reevaluation and provide a clear and concise summary of the data and assessment conducted that meets the requirements of 3301-51-06 (G) (Summary of information). The IEP team must consider the results of this reevaluation.</p> <p><u>Systemic Correction</u></p> <p>The educational agency must submit evidence to the Department of written procedures and practices regarding summary of data and assessment results.</p> <p>Jefferson Township Local must develop an internal monitoring practice that will monitor the completion of the Part 2 summary of assessment results. This will ensure that all areas assessed in Part 1 Individual Evaluator’s Assessment are fully summarized in the Part 2.</p> <p>The Department will verify 100% compliance in this area through a review of new records that have been written after all trainings have been completed.</p> <p><u>Opportunities for Improvement</u></p> <p>This is an opportunity for professional development and/or targeted technical assistance from SST staff.</p> <p>Recommended moving forward: The use of headers that highlight each academic/behavior need (i.e. reading, writing, math) rather than title of person responsible for assessment will better highlight that all areas noted on the planning form are included.</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 15 evaluation team reports reviewed, or 27%, did not contain a clear and succinct description of educational needs.</p> <p><u>Interviews</u></p> <p>Through interviews, it appeared that teachers have not had any professional development in writing Part 1s. They stated that it would be beneficial to have training regarding what specific information is needed.</p> <p><u>Concerns Noted</u></p> <p>Educational needs did not address the child's individualized needs.</p>	<p><u>Individual Correction</u></p> <p>The educational agency will reconvene the ETR teams to conduct a reevaluation and provide a clear and succinct description of the student's educational needs. The IEP team must consider the results of this reevaluation.</p> <p><u>Systemic Correction</u></p> <p>It is recommended that the educational agency review and revise regarding the written procedures and practices regarding description of educational needs from all Part 1s. The Department will verify 100% compliance in this area through a review of new records that have been written after all trainings have been completed.</p> <p><u>Opportunities for Improvement</u></p> <p>Providing professional development on how to write purposeful educational needs to all staff members, who might be requested to complete a Part 1, is recommended.</p>	<p><input checked="" type="checkbox"/> No</p> <p>This finding does not need to be addressed in a Corrective Action Plan.</p>
CF-8	<p>34 CFR 300.306(c) [Procedures for determining eligibility and educational need]</p> <p>Four out of 15 evaluation team reports reviewed, or 27%, did not contain specific implications for instruction.</p>	<p><u>Individual Correction</u></p> <p>The educational agency will reconvene the ETR teams to conduct a reevaluation and provide a clear description of specific implications for instruction. The IEP team must consider the results of this reevaluation.</p> <p><u>Systemic Correction</u></p> <p>It is recommended that the educational agency review and revise its 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><u>Opportunities for Improvement</u></p> <p>Providing professional development on how to write purposeful implications for instruction to all staff members, who might be requested to complete a Part 1, is recommended.</p>	<p><input checked="" type="checkbox"/> No</p> <p>This finding does not need to be addressed in a Corrective Action Plan.</p>

Record Review Item	Evidence of Findings	Evidence of Corrections/Recommendations	Must be Addressed in CAP
CF-9	<p>34 CFR 300.306(a)(1) [Determination of eligibility] OAC 3301-51-01 (B)(21) [Applicability of requirements and definitions]</p> <p>Three out of 15 evaluations reviewed, or 20%, did not show evidence that a group of qualified professionals, as appropriate to the suspected disability, were involved in determining whether the child is a child with a disability as well as the child's educational needs.</p>	<p><u>Individual Correction</u> The educational agency must provide evidence that the ETR teams and other qualified professionals, as appropriate, participated in the determination of eligibility and educational needs. If not, the ETR team must reconvene and provide the Department evidence of group participation.</p> <p><u>Systemic Correction</u> It is recommended that the educational agency review and revise its 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><u>Opportunities for Improvement</u> It is recommended that Jefferson Township Local develop a procedure of checks and balances to ensure all members of the ETR team are in attendance for the entire length of the evaluation meeting. Training is also recommended to provide staff with the knowledge of legal responsibilities and who is required to attend ETR meetings.</p>	<input checked="" type="checkbox"/> No This finding does <u>not</u> need to be addressed in a Corrective Action Plan.
CF-10	<p>OAC 3301-51-01 (B)(10) [Definitions] and 3301-51-06 [Evaluations]</p> <p>Seven out of 15 evaluations reviewed, or 47%, did not provide a justification for the eligibility determination decision.</p> <p><u>Concerns Noted</u> In many cases, the justification did not identify how the disability affects the child's progress in the general education curriculum.</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. Jefferson Township must develop an internal monitoring process to ensure that a compliant justification for the eligibility determination decision was developed.</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 Corrections/Recommendations	Must be Addressed in CAP
		<p>The Department will verify 100% compliance in this area through a review of new records that have been written after all trainings have been completed.</p> <p><u>Opportunities for Improvement</u></p> <p>The newly developed Internal Monitoring Team will be trained by the Supports and Monitoring Team on all areas of compliance for the ETR and IEP. They will also benefit from professional development by the State Support Team 10 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>Six out of six 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 An intervention specialist stated they usually conduct the activities after testing and before the end of the year. The IEP transition plan typically outlined quarterly activities.</p> <p>Concerns Noted The secondary transition process and responsibilities need adherence to frequency as outlined in the IEP. A system needs to be in place for remote students to complete their transition activities with an intervention specialist.</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.</p> <p>Systemic Correction The educational agency must submit evidence to the Department of written procedures and practices regarding transition services. Jefferson Township must develop an internal monitoring process that will ensure that transition plans in the current IEP meet all eight required elements for IDEA using the Indicator 13 Checklist. The Department will verify 100% compliance in this area through a review of new records that have been written after all trainings have been completed.</p> <p>Opportunities for Improvement There is an opportunity to strengthen the development of IEP transition services by conducting thorough, relevant, and comprehensive AATAs so that services are individualized based upon each student’s preferences, interests, needs, and strengths (PINS). Training and technical assistance should be provided to all ETR and IEP team members responsible for assessing 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>Fifteen (15) out of 15 IEPs reviewed, or 100%, did not contain Present Levels of Academic Achievement and Functional Performance (PLOP) that addressed the needs of the student.</p> <p><u>Interviews</u></p> <p>From interviews, our team concluded there is a lack of understanding among staff members regarding the required contents of the present levels for IEP goals. This points to an opportunity to further deploy and develop already existing training and technical assistance in this area.</p> <p><u>Concerns Noted</u></p> <p>Baseline data of the student’s performance was not in alignment with the condition, behavior, and performance criteria of the measurable IEP goal.</p> <p>Comparison statement of the student’s performance to expected grade-level standards or expected age-appropriate performance levels was often missing.</p> <p>The present levels often contained extraneous information or lacked specific reference to the current performance based upon the goal measurement.</p>	<p><u>Individual Correction</u></p> <p>The educational agency must reconvene the IEP teams of the IEPs identified as noncompliant to review and amend the PLOP related to each goal to include 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 <u>grade-level</u> 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 <u>directly</u> relates to the goal measurement. <p><u>Systemic Correction</u></p> <p>The educational agency must submit evidence to the Department of written procedures and practices regarding the review of current academic/functional data when writing IEPs.</p> <p>Jefferson Township must develop an internal monitoring process to ensure that all present levels of academic achievement and functional performance (PLOP) are compliant and addressed the needs of the student.</p> <p>The Department will verify 100% compliance in this area through a review of new records that have been written after all trainings have been completed.</p> <p><u>Opportunities for Improvement</u></p> <p>This 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.</p>	<p><input checked="" type="checkbox"/> Yes</p> <p>This finding needs to be addressed in a Corrective Action Plan.</p>

Record Review Item	Evidence of Findings	Evidence of Correction/Recommendations	Must be Addressed in CAP
DS-3	<p>34 CFR 300.320(a)(2)(i) [Definition of individualized education program]</p> <p>Seven out of 15 IEPs reviewed, or 47%, did not contain measurable annual goals.</p> <p>Concerns Noted</p> <p>Measurable goals in the IEPs reviewed were often missing one or more required elements (described under “Individual Correction”).</p>	<p>Individual Correction</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>Systemic Correction</p> <p>The educational agency must submit evidence to the Department of written procedures and practices regarding the development of measurable annual IEP goals.</p> <p>Jefferson Township must develop an internal monitoring process to ensure staff members develop compliant measurable annual goals.</p> <p>The Department will verify 100% compliance in this area through a review of new records that have been written after all trainings have been completed.</p> <p>Opportunities for Improvement</p> <p>There is an opportunity for professional development and/or targeted technical assistance in developing compliant measurable goals.</p>	<p><input checked="" type="checkbox"/> Yes</p> <p>This finding needs to be addressed in a Corrective Action Plan.</p>
DS-4	<p>34 CFR 300.320(a)(2)(i) [Definition of individualized education program]</p> <p>All applicable IEPs reviewed contained annual goals that address the child’s academic area(s) of need.</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-5	<p>34 CFR 300.320(a)(2)(i) [Definition of individualized education]</p> <p>One out of 10 applicable 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></p> <p>The educational agency must reconvene the teams of the IEPs identified as noncompliant to review and amend the IEP. Annual goals must address the functional needs of the child unless the team provides evidence that the goals were prioritized based on the severity of the needs of the child.</p> <p><u>Systemic Correction</u></p> <p>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</p> <p>This finding does <u>not</u> need to be addressed in a Corrective Action Plan.</p>
DS-6	<p>34 CFR 300.320(a)(4) [Definition of individualized education program] OAC 3301-51-07 (H)(1)(e)(i) [Definition of IEP]</p> <p>Fifteen (15) out of 15 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><u>Interviews</u></p> <p>Staff members stated it is difficult to describe and deliver SDI to students using the remote educational platforms.</p> <p><u>Concerns Noted</u></p> <p>In some of the IEPs reviewed, SDI was not individualized to the needs described in the present levels and goals. Others simply repeated the same goals and others only listed accommodations.</p> <p>Specially Designed Instruction was not delivered as outlined on the IEP. Progress monitoring data was not available and inconsistent.</p>	<p><u>Individual Correction</u></p> <p>The educational agency must reconvene the teams of the IEPs identified as noncompliant to review and amend the specially designed instruction, as appropriate, to address the needs of the child.</p> <p><u>Systemic Correction</u></p> <p>The educational agency must submit evidence to the Department of written procedures and practices regarding the IEP process of determining specially designed instruction.</p> <p>Jefferson Township must develop an internal monitoring process that will ensure that the IEP specifically identifies the provision of specially designed instruction (SDI) and related services AND describes the nature of the instruction that aligns with the needs of the child AND supports achievement of annual goals. The SDI describes skills and methods used for instruction specific to the goal; OR The child is receiving related services that the IEP team has determined is specially designed 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 Correction/Recommendations	Must be Addressed in CAP
		<p>The Department will verify 100% compliance in this area through a review of new records that have been written after all trainings have been completed.</p> <p><u>Opportunities for Improvement</u> Training and technical assistance from SST staff as well as an internal monitoring review system would be very helpful to promote compliance in the area of writing compliant SDI statements.</p>	
<p>DS-7</p>	<p>34 CFR 300.320(a)(7) [Definition of individualized education program] OAC 3301-51-07 (H)(1)(i) [Definition of IEP]</p> <p>Four out of 15 IEPs reviewed, or 27%, did not indicate the specific location where the specially designed instruction will be provided.</p> <p><u>Interviews</u> Virtual educational platform continues to be a frustration for intervention specialists to work with students.</p> <p><u>Concerns Noted</u> Explain how the SDIs will be delivered in the virtual classroom with option for individual direct instruction.</p>	<p><u>Individual Correction</u> The educational agency must reconvene the teams of the IEPs identified as noncompliant to review and amend the location where the specially designed instruction will be provided.</p> <p><u>Systemic Correction</u> It is recommended that the educational agency review and revise its 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><u>Opportunities for Improvement</u> The district would benefit in decreasing the number of students enrolled in remote learning platforms and integrate students back into the schools for direct instruction. Training and technical assistance from SST staff as well as an internal monitoring review system would be very helpful to promote compliance in the area of SDI location.</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-8	<p>34 CFR 300.320(a)(7) [Definition of individualized education program] OAC 3301-51-07 (H)(1)(i) [Definition of IEP]</p> <p>One out of 15 IEPs reviewed, or 7%, did not indicate the amount of time and frequency of the specially designed instruction.</p>	<p><u>Individual Correction</u> 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> It is recommended that the educational agency review and revise its written procedures and practices regarding the IEP process of determining the amount and frequency of specially designed instruction to be provided. The Department will verify 100% compliance in this area through 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-9	<p>34 CFR 300.324(a)(2)(v) [Development of IEP] OAC 3301-51-01(B)(3) [Applicability of requirements and definitions]</p> <p>There were no applicable IEPs reviewed for assistive technology.</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]</p> <p>Twelve (12) out of 14 applicable IEPs reviewed, or 86%, did not identify accommodations provided to enable the child to be involved and make progress in the general education curriculum.</p> <p><u>Interviews</u> General education teachers shared they need more training on how to provide accommodations for students with an IEP.</p> <p><u>Concerns Noted</u> IEP accommodations listed were not explained regarding conditions and extent of the accommodation. The condition(s) and/or extent were not clearly explained (who, when, and where services were provided).</p>	<p><u>Individual Correction</u> The educational agency must reconvene the teams of the IEPs identified as noncompliant to review the accommodations that would directly assist the child to access the course content without altering the scope or complexity of the information taught and include them on the IEP.</p> <p><u>Systemic Correction</u> The educational agency must submit evidence to the Department of written procedures and practices regarding accommodations. Jefferson Township must develop an internal monitoring process that will ensure that current IEPs contain appropriate and clear accommodations which will allow the child to be involved and make progress in the general education curriculum.</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
		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.	
DS-11	<p>34 CFR 300.320(a)(4) [Definition of individualized education program] OAC 3301-51-07 (H)(1)(e) [Definition of IEP]</p> <p>Three out of three 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>Interviews Staff requested professional development/technical assistance in identifying modifications to enable the child to be involved and make progress in the general education curriculum.</p> <p>Concerns Noted The extent of and conditions for modifications must be explained.</p>	<p>Individual Correction 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>Systemic Correction The educational agency must submit evidence to the Department of written procedures and practices regarding modifications. Jefferson Township must develop an internal monitoring process that will ensure that the current IEP contains a clear description of the modification(s) that will enable the child to be involved and make progress in the general education curriculum. 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.
DS-12	<p>34 CFR 300.320(a)(4) [Definition of individualized education program] OAC 3301-51-07 (H)(1)(e) [Definition of IEP]</p> <p>All applicable IEPs reviewed identified supports for school personnel to enable the child to be involved and make progress in the general education curriculum.</p>	<p>Individual Correction NA</p> <p>Systemic Correction NA</p>	<input checked="" type="checkbox"/> NA
DS-13	<p>OAC 3301-51-07 (H)(1)(h)(ii) [Definition of IEP]</p> <p>All applicable student records reviewed had a justification statement explaining why the student cannot participate in the regular assessment and why the alternate assessment is appropriate for the student.</p>	<p>Individual Correction NA</p> <p>Systemic Correction NA</p>	<input checked="" type="checkbox"/> NA

Record Review Item	Evidence of Findings	Evidence of Correction/Recommendations	Must be Addressed in CAP
DS-14	<p><i>OAC 3301-51-07(L)(2) [Development, review and revision of IEP]</i></p> <p>Six out of 14 applicable student records reviewed, or 43%, did not show evidence of progress reporting data collected and analyzed to monitor performance on each goal.</p> <p><u>Interviews</u> Intervention specialists expressed frustration of students not responding to “Google Meets” appointments for SDI instruction.</p> <p><u>Concerns Noted</u> In many cases, progress monitoring reports were blank.</p>	<p><u>Individual Correction</u> None</p> <p><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. Jefferson Township must develop an internal monitoring process that will ensure that the current IEP contains instructional data collected for each measurable annual goal; and there is evidence that the progress data reported align to measurement(s) used in the annual goal statement. Jefferson Township must develop and implement a formal process of tracking and analyzing the progress of measurable annual goals. Progress on goals should be reported in alignment with the measurement used in the annual goal statement to ensure Free Appropriate Public Education [OAC 3301-51-07 (K)]. Procedures must be developed to ensure parents/guardians receive progress updates for their child. The Department will verify 100% compliance in this area through a review of new records that have been written after all trainings have been completed.</p> <p><u>Opportunities for Improvement</u> Progress monitoring is 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. Training from SST staff would be very helpful to promote compliance in the area of progress monitoring.</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
DS-15	<p><i>OAC 3301-51-07(L) [Development, review and revision of IEP]</i></p> <p>Two out of four applicable IEPs reviewed, or 50%, did not show evidence that revisions were made based on data indicating changes in student needs or abilities.</p> <p><u>Concerns Noted</u></p> <p>The records indicated that the current IEP was not revised based on the current data indicating changes in student needs and abilities. Please see the specific language in each student record comment sheet.</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>Jefferson Township Local School District must develop an internal monitoring process that will ensure data from progress monitoring and/or recent evaluations drive decisions made to revise the IEP.</p> <p>The Department will verify 100% compliance in this area through a review of new records that have been written after all trainings have been completed.</p> <p><u>Opportunities for Improvement</u></p> <p>Training from SSTs would be very helpful to promote compliance in the area of IEP review and IEP amendment.</p>	<p><input checked="" type="checkbox"/> Yes</p> <p>This finding needs to be addressed in a Corrective Action Plan.</p>
DS-16	<p><i>34 CFR 300.321(5) [IEP team]</i> <i>OAC 3301-51-07(I) [IEP team]</i></p> <p>Five out of 15 IEPs reviewed, or 33%, did not indicate that the IEP Team included a group of qualified professionals.</p> <p><u>Interviews</u></p> <p>Frustration was expressed at the lack of parent/guardian participation. General education teachers also expressed reluctance signing for students' IEP's who did not attend their classes. Additionally, there are not enough staff to cover teachers to attend IEP meetings.</p> <p><u>Concerns Noted</u></p> <p>In many cases, the general education teachers have never seen the student's IEP, nor do they know how to access it.</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 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><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>Districts need to have some form of procedure in place to ensure proper documentation is provided when conducting video calls or phone conferences.</p>	<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 all required team members, including the parent, in IEP meetings.</p> <p>Jefferson Township must develop an internal monitoring process that will ensure the IEP Team includes a group of qualified professionals.</p> <p>The Department will verify 100% compliance in this area through a review of new records that have been written after all trainings have been completed.</p> <p><u>Opportunities for Improvement</u></p> <p>Training from SSTs would be very helpful to promote compliance in this area.</p>	

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

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

Record Review Item	Evidence of Findings	Evidence of Correction/Recommendations	Must be Addressed in CAP
LRE-1	<p>34 CFR 300.114 [LRE requirements] and 300.320(a)(5) [Definition of individualized education program] OAC 3301-51-07 (H)(1)(f) [Definition of individualized education program]</p> <p>Thirteen (13) out of 15 IEPs reviewed, or 87%, 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>Interviews</p> <p>During interviews it was stated that the lack of staff and curriculum were a contributing factor for determining LRE instead of being based on the student's individual needs.</p> <p>Related service providers expressed frustration that many of their students on their caseload were not in attendance in the Jr./High school building making it difficult to serve the students.</p> <p>Concerns Noted</p> <p>Communication is poor on the attendance status as well as monitoring students on home virtual education platforms. Documentation of the change of placement of students is inconsistent, and not communicated to all staff.</p>	<p>Individual Correction</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>Systemic Correction</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>Jefferson Township must develop an internal monitoring process that will ensure that the child's LRE is based on an IEP team decision.</p> <p>The Department will verify 100% compliance in this area through a review of new records that have been written after all training courses have been completed.</p> <p>Opportunities for Improvement</p> <p>Jefferson Township Local will benefit from training from SST staff on the continuum of alternative placements for all students. Additional training and technical assistance would benefit staff members developing LRE statements to ensure that those statements provide a justification for why the student is not participating in the general education school environment.</p>	<p><input checked="" type="checkbox"/> Yes</p> <p>This finding needs to be addressed in a Corrective Action Plan.</p>

Additional Considerations and Opportunities for Improvement:

The district must review, revise, or update the policies, procedures and practices regarding discipline and behavior support services. This includes Manifestation Determination Reviews (MDRs), Functional Behavior Assessments (FBAs) and Behavior Intervention Plans (BIPs). This is necessary when students are being considered for a change of placement to the Educational Service Center (ESC) or virtual home instruction.

During the interview sessions, both intervention specialists and general education teachers expressed a need for both professional development and support at the building level for a co-teaching model to be successful. They also voiced the need for common planning time to be successful.

There are many high school student removals that result in placements in the virtual Grad Alliance or Future Self Program. During interviews, we were unable to ascertain who is monitoring the students' time online and the outcomes. Intervention Specialists had difficulties meeting with students via remote instructions in order to deliver SDIs.