

Mayfield City School District
IRN: 044370

Ohio Department of Education and Workforce
Office for Exceptional Children
2024-2025 IDEA Monitoring Review Summary Report

Introduction

The Ohio Department of Education and Workforce, Office for Exceptional Children, would like to extend appreciation to the Mayfield City 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 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 11-13, 2025, 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 areas:

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

Data Sources

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

1. Parent Input

Mayfield City Schools mailed 1,062 letters of the Department's notification of review to all families with students with disabilities in the educational agency. The educational agency posted the notification of review on its website which included a link to a recorded presentation from the Department providing an overview of the monitoring review process. The presentation also provides contact information and requests parents to provide comments to the Department regarding the special education program in their school. The notification of review was also posted on the Department's website.

The Department received two written comments that were extremely positive regarding Mayfield City School District's special education department.

2. Pre-Onsite Data Analysis

The Department conducted a comprehensive review which included district, building and grade level data; Special Education Profile; Ohio School Report Cards; Comprehensive Continuous Improvement Plan (CCIP) and/or OnePlan; and Education Management Information System (EMIS) data. The data analysis assisted the Department in determining potential growth areas for improvement and educational agency strengths.

3. Record Review/IEP Verification

Prior to the onsite visit, the Department staff reviewed 32 records of school-age students with disabilities. The Department staff selected records of students with disabilities from a variety of disability categories and ages across all buildings. Nineteen (19) student records were selected for IEP verification in the classroom setting.

Overall, Mayfield's evaluation team reports and ETRs and IEPs were in excellent shape. Several ETRs were 100% compliant and two of their IEPs were 100% compliant. It is obvious that Mayfield understands compliance and strives for best practice.

4. Staff/Administrative Interviews

On March 11, 2025, the Department consultants held 15 sessions of interviews with 6 administrators and 100 teachers, school counselors, related services personnel, school psychologists, and paraprofessionals. Interviews focused on the following review areas: Child Find; Delivery of Services; Least Restrictive Environment (LRE) and IEP alignment and Discipline.

Strengths/Commendations:

During the interviews, staff was very complementary of the special education program at Mayfield. Students are treated equally, with everyone doing what is needed for students with disabilities.

Mayfield's administration is already planning to update certain practices and processes like a district wide Multi-Tiered Systems of Support (MTSS) process as well as looking into how co-teaching is done in the elementary buildings. Mayfield High School has a great co-teaching process.

Mayfield is known in their community as having a strong special education program and because of this people try to move their children to the district. The use of "Specials" day in the elementary buildings provide staff time to collaboration and RTI/MTSS data collecting and discussions.

The high schools "option program" is outstanding, providing students with a unique learning environment that also builds up skills students can use and benefit from in the actual work environment. And finally, Mayfield's staff are passionate about what they do, and everyone works well together as a team.

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 raymond.mccain@education.ohio.gov within 30 school days from the date of this report. The Department will review the CAP 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: September 26, 2025

Department Trainings

As part of the Department monitoring process, Mayfield City School District personnel, as identified by the Department, are required to complete the OEC Special Education Process Learning Management System (LMS) training modules 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, 2025

Individual Correction

The educational agency has **60 school days** from the date of this 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 11, 2025

CAP Activities and Systemic Correction

The educational agency will provide the Department with documentation verifying the educational agency's completion of all CAP activities and all systemic corrections noted in this summary report. The Department will verify systemic correction through the review of this documentation and a review of additional student records.

Completion of CAP Activities and Systemic Correction Due Date: April 2, 2026

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

For questions regarding the review, please contact: Raymond McCain, the Department's IDEA Monitoring Contact, at 614-593-5477, toll-free at (877) 644-6338, or by e-mail at Raymond.McCain@education.ohio.gov.

The Department's Review Findings and Educational Agency Required Actions

Component 1: Child Find

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

Record Review Item	Evidence of Findings	Evidence of Corrections/Recommendations	Must be Addressed in CAP
CF-1	<p><u>OAC 3301-51-06 [Evaluations]</u></p> <p>Ten (10) out of 32, or 31% of evaluations reviewed did not appropriately document interventions provided to resolve concerns for the child performing below grade-level standards.</p> <p><u>Interviews</u></p> <p>Intervention specialists stated that ever since the math and reading specialist position no longer exists, they are responsible for providing Tier 1 and Tier 2 interventions. This has impeded their time needed for students with disabilities and their specially designed instruction.</p> <p><u>Concerns Noted</u></p> <p>Initial evaluations were missing:</p> <ol style="list-style-type: none"> 1. A description of the research-based intervention(s) used; 2. How long was the intervention provided (how many weeks); 3. The intensity of the intervention – how often, and for how many minutes; 4. A description of the results compared to the baseline data; 5. The decision as a result of the intervention(s). <p>For reevaluations: In most cases, the summary only stated the IEP services the student is currently receiving. If no additional interventions were provided, there needs to be a statement that it was determined by the ETR team that the student is making adequate progress with current special education support and services required in the IEP.</p>	<p><u>Individual Correction</u></p> <p>The Department has verified that these students have a current ETR in place, so no additional individual correction is required.</p> <p><u>Systemic Correction</u></p> <p>The educational agency must submit evidence to the Department of written procedures and practices regarding documentation of intervention and supports provided prior to completion of the initial and reevaluation team report. The Department will verify 100% compliance in this area through a review of new records that have been written after all training has been completed.</p> <p>Mayfield City School District needs to develop a procedure of checks and balances to ensure interventions that are being provided to students are correctly documented within the ETR as well as in the Part 2 Summary of Interventions.</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-2	<p>34 CFR 300.501(b) [Parent participation in meetings] and OAC 3301-51-06 (E)(2)(a) [Evaluation procedures].</p> <p>All student records reviewed showed evidence that the parents were afforded the opportunity to participate in the evaluation team planning process.</p>	<p><u>Individual Correction</u> NA</p> <p><u>Systemic Correction</u> NA</p>	<input checked="" type="checkbox"/> NA
CF-3	<p>34 CFR 300.300 [Parental Consent]</p> <p>All student records reviewed provided evidence of parental consent obtained prior to evaluation.</p>	<p><u>Individual Correction</u> NA</p> <p><u>Systemic Correction</u> NA</p>	<input checked="" type="checkbox"/> NA
CF-4	<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 32, or 47% of evaluations reviewed did not provide evidence that the evaluation addresses all areas related to the suspected disability.</p> <p><u>Interviews</u></p> <p>Staff members stated that a lack of guidance has been provided regarding completing Part 1s compliantly when they were assigned to complete by the school psychologist.</p> <p><u>Concerns Noted</u></p> <p>In several cases, assessments included on the planning form were not presented in Part 1 of the ETR, and, in other cases, assessments were reported in Part 1 that were not included on the planning form. All assessments and data listed for evaluation on the ETR planning form, and agreed upon by the parent, must appear in some form in a Part 1 individual evaluator's assessment.</p>	<p><u>Individual Correction</u></p> <p>The educational agency will convene the ETR teams to conduct a reevaluation and provide evidence that the evaluation addresses all areas related to the suspected disability.</p> <p><u>Systemic Correction</u></p> <p>The educational agency must submit evidence to the Department of written procedures and practices to provide evidence that the evaluation addresses all areas related to the suspected disability. The Department will verify 100% compliance in this area through a review of new records that have been written after all training has been completed.</p> <p>Mayfield City Schools need to develop a procedure of checks and balances to ensure that all assessments indicated on the Planning Form as either sufficient data available or additional testing/data needed has a Part 1 completed.</p>	<input checked="" type="checkbox"/> Yes This finding needs to be addressed in a Corrective Action Plan.

Record Review Item	Evidence of Findings	Evidence of Corrections/Recommendations	Must be Addressed in CAP
CF-5	<p>34 CFR 300.306(c) [Procedures for determining eligibility and educational need]</p> <p>Ten (10) out of 32, or 31% of evaluations reviewed did not show evidence of clearly stating the summary of assessment results.</p> <p><u>Concerns Noted</u></p> <p>The information from Part 1 was not summarized in a clear and concise manner in Part 2. In some instances, the information was entirely omitted. Information in all Part 1s must be summarized Part 2 in a manner that can be clearly understood by the parent and used by the IEP team to develop meaningful goals and services</p>	<p><u>Individual Correction</u></p> <p>The educational agency will reconvene the ETR teams to conduct a reevaluation and provide a clear and concise summary of the data and assessment conducted that meets the requirements of 3301-51-06 (G) (Summary of information). The IEP team must consider the results of this reevaluation.</p> <p><u>Systemic Correction</u></p> <p>The educational agency must submit evidence to the Department of written procedures and practices regarding summary of data and assessment results. The Department will verify 100% compliance in this area through a review of new records that have been written after all training has been completed.</p> <p>Mayfield City Schools need to develop a procedure of checks and balances plan to ensure:</p> <ul style="list-style-type: none"> • Active team participation in the ETR planning process. • Assessments identified on the planning form are being completed and represented in Part 1 and are summarized within Part 2 in parent friendly language. <p><u>Opportunities for Improvement</u></p> <p>Professional development should be provided to all identified staff members regarding participation and completion of the required components of the ETR form thus allowing them to be an active member in the development of ETRs.</p>	<p><input checked="" type="checkbox"/> Yes</p> <p>This finding needs to be addressed in a Corrective Action Plan.</p>

Record Review Item	Evidence of Findings	Evidence of Corrections/Recommendations	Must be Addressed in CAP
CF-6	<p>34 CFR 300.306(c) [Procedures for determining eligibility and educational need]</p> <p>Four out of 32, or 13% of evaluation team reports reviewed did not contain a clear and succinct description of educational needs.</p> <p>Interviews</p> <p>General education teachers were not comfortable providing or listing needs in their Part 1 due to fact they were unsure what to list or how many to list.</p> <p>Concerns Noted</p> <p>Educational needs were sometimes generic in nature and did not address the child's individualized needs. Sometimes educational needs were stated in Part 1 but were not included in the Part 2 summary.</p> <p>The description of educational needs for the ETRs was not summarized but instead contained a lot of information that was not specific to the student's individual educational needs. These descriptions did not provide sufficient information for the IEP team to develop effective IEPs. Some descriptions left out relevant information related to the reported assessments.</p>	<p>Individual Correction</p> <p>The educational agency will reconvene the ETR teams to conduct a reevaluation and provide a clear and succinct description of the students' educational needs. The IEP team must consider the results of this reevaluation.</p> <p>Systemic Correction</p> <p>It is recommended that the educational agency review and revise its written procedures and practices regarding the description of educational needs. The Department will verify 100% compliance in this area through a review of new records that have been written after all training has been completed.</p>	<p><input checked="" type="checkbox"/> No This finding does <u>not</u> need to be addressed in a Corrective Action Plan.</p>
CF-7	<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 32, or 9% of evaluations reviewed did not show evidence that a group of qualified professionals, as appropriate to the suspected disability, were involved in determining whether the child is a child with a disability as well as the child's educational needs.</p>	<p>Individual Correction</p> <p>The educational agency must provide evidence that the ETR teams and other qualified professionals, as appropriate, participated in the determination of eligibility and educational needs. If not, the ETR team must reconvene and provide the Department with evidence of group participation.</p> <p>Systemic Correction</p> <p>It is recommended that the educational agency review and revise its written procedures and practices regarding the eligibility determination process to include all required team members. The Department will verify 100% compliance in this area through a review of new records that have been written after all training has been completed.</p>	<p><input checked="" type="checkbox"/> No This finding does <u>not</u> need to be addressed in a Corrective Action Plan.</p>

Record Review Item	Evidence of Findings	Evidence of Corrections/Recommendations	Must be Addressed in CAP
CF-8	<p><i>OAC 3301-51-01 (B)(10) [Definitions] and 3301-51-06 [Evaluations]</i></p> <p>Seven out of 32, or 22% of evaluations reviewed did not provide a justification for the eligibility determination decision.</p> <p><u>Concerns Noted</u></p> <p>In these records, the justification statements did not state how the student did not meet the eligibility determination category when two or more suspected disabilities were listed on the Planning Form.</p>	<p><u>Individual Correction</u></p> <p>The educational agency will reconvene the ETR teams to conduct a reevaluation and provide a clear justification for the eligibility determination.</p> <p><u>Systemic Correction</u></p> <p>It is recommended that the educational agency review and revise its written procedures and practices regarding the eligibility determination decision. The Department will verify 100% compliance in this area through a review of new records that have been written after all training has been completed.</p>	<p><input checked="" type="checkbox"/> No This finding does <u>not</u> need to be addressed in a Corrective Action Plan.</p>

Component 2: Delivery of Services

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

Record Review Item	Evidence of Findings	Evidence of Correction/Recommendations	Must be Addressed in CAP
<p>DS-1</p>	<p>SPP Indicator 13 34 CFR 300.320(b) [Transition services] OAC 3301-51-07 (H)(2) [Definition of individualized education program]</p> <p>Seven out of 13, or 54% of applicable IEPs reviewed 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 post-secondary 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 that 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>Concerns Noted</p> <p>Areas most found noncompliant revolved around preferences, interests, needs, and strengths (PINS), goals not measurable, and listing of the wrong type of course of study the student will be provided.</p>	<p>Individual Correction</p> <p>The educational agency must reconvene the teams to review and correct the postsecondary transition plan for the IEPs identified as noncompliant.</p> <p>Systemic Correction</p> <p>The educational agency must submit evidence to the Department of written procedures and practices regarding transition services. The Department will verify 100% compliance in this area through a review of new records that have been written after all training has been completed.</p> <p>Mayfield City School District needs to develop a procedure of checks and balances to ensure: All 8 questions on the indicator 13 checklist are answered compliantly while meeting the unique needs of each 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>Twenty (20) out of 32, or 63% of IEPs reviewed did not contain Present Levels of Academic Achievement and Functional Performance (PLOP) that addressed the needs of the student.</p> <p><u>Interviews</u></p> <p>Staff interviewed were not certain about what specific type of current baseline data was needed for a compliant PLOP. Some were under the impression that only ETR or recent assessment data was to be provided, others knew how the student was progressing on the actual goal the student was being taught.</p> <p><u>Concerns Noted</u></p> <p>Several of the current baseline data was either at or above the mastery levels stated in the measurable goals.</p> <p>Several IEPs had current baseline data, but it did not relate to the actual skill stated in the measurable goal.</p> <p>A few present levels of performance were missing the grade level standard comparison statement.</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. The Department will verify 100% compliance in this area through a review of new records that have been written after all training has been completed.</p> <p>Mayfield City School District needs to develop a procedure of checks and balances to ensure Present Levels of Performance include both current baseline data and a grade level or appropriate age comparison statement.</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>Nineteen (19) out of 32, or 59% of IEPs reviewed did not contain measurable annual goals.</p> <p>Interviews</p> <p>During interviews, staff stated when it came to behavioral goals, they did not feel comfortable delivering services to those students since they were not certified as a behavior therapist.</p> <p>It was also stated that students really needed to have these behavioral goals delivered in the general education setting since students needed to be able to exhibit those behaviors around their general education peers.</p> <p>Concerns Noted</p> <p>Several goals contained two or more skills, making them noncompliant.</p> <p>Several goals were missing the condition.</p> <p>Often the condition was lacking specific details which made the skill of the goal hard to understand.</p> <p>For example: "when given a visual schedule, the student will" or "When presented with 4-word problems involving (2) adding and (2) subtracting money, the student will solve..."</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. The Department will verify 100% compliance in this area through a review of new records that have been written after all training has been completed.</p> <p>Mayfield City School District needs to develop a procedure of checks and balances to ensure measurable goals:</p> <ul style="list-style-type: none"> • Contain all required components. • Contain one specific skill. • Contain specific conditions so the skill can be better understood. • Are written specifically to the students' needs listed or identified within their ETR. <p>It is also recommended Mayfield City Schools consider how services for behavioral goals are being delivered to students with disabilities. The addition of a certified behavior therapist in each of the buildings could ensure behavioral goals are being delivered by someone who is skilled in handling aggressive behaviors of students in a safe and professional manner.</p>	<p><input checked="" type="checkbox"/> Yes</p> <p>This finding needs to be addressed in a Corrective Action Plan.</p>

Record Review Item	Evidence of Findings	Evidence of Correction/Recommendations	Must be Addressed in CAP
DS-4	<p>34 CFR 300.320(a)(2)(i) [Definition of individualized education program]</p> <p>One out of 26, or 4% of IEPs reviewed did not contain annual goals that address the child’s academic area(s) of need.</p>	<p><u>Individual Correction</u></p> <p>The educational agency must reconvene the teams of the IEPs identified as noncompliant to review and amend the IEP. Annual goals must address the academic needs of the child unless the team provides evidence that the goals were prioritized based on the severity of the needs of the child.</p> <p><u>Systemic Correction</u></p> <p>It is recommended that the educational agency review and revise its written procedures and practices regarding the IEP process of addressing identified academic needs. The Department will verify 100% compliance in this area through a review of new records that have been written after all training has been completed.</p>	<p><input checked="" type="checkbox"/> No This finding does <u>not</u> need to be addressed in a Corrective Action Plan.</p>
DS-5	<p>34 CFR 300.320(a)(2)(i) [Definition of individualized education]</p> <p>Four out of the 26, or 15% of IEPs reviewed did not contain annual goals that address the child’s functional area(s) of need.</p> <p><u>Concerns Noted</u></p> <p>There were some ETRs that had specific functional needs addressed within Part 1 that were not addressed in the current IEP.</p> <p>Some of the needs stated were more than three years old and were no longer a need for the student at this time without a statement in the Profile stating that those needs were no longer an issue for the student at this time.</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 training has been completed.</p>	<p><input checked="" type="checkbox"/> No This finding does <u>not</u> need to be addressed in a Corrective Action Plan.</p>

Record Review Item	Evidence of Findings	Evidence of Correction/Recommendations	Must be Addressed in CAP
DS-6	<p>34 CFR 300.320(a)(4) [Definition of individualized education program] OAC 3301-51-07 (H)(1)(e)(i) [Definition of IEP]</p> <p>Twenty (20) out of 32, or 63% of IEPs reviewed did not contain a statement of specially designed instruction (SDI) including related services that addresses the individual needs of the child and supports the annual goals.</p> <p><u>Interviews</u></p> <p>Staff stated that providing SDI is their number 1 priority and no matter what else is on their schedule, they ensure SDIs are being delivered as written.</p> <p><u>Concerns Noted</u></p> <p>The nature of instruction must align with the student’s individual needs and skills. In many instances, the SDI was very broad and not specific to the student.</p> <p>SDI needs to reference the actual skill stated in the measurable goal.</p>	<p><u>Individual Correction</u></p> <p>The educational agency must reconvene the teams of the IEPs identified as noncompliant to review and amend the specially designed instruction, as appropriate, to address the needs of the child.</p> <p><u>Systemic Correction</u></p> <p>The educational agency must submit evidence to the Department of written procedures and practices regarding the IEP process of determining specially designed instruction. The Department will verify 100% compliance in this area through a review of new records that have been written after all training has been completed.</p> <p>Mayfield City School District needs to develop checks and balances to ensure:</p> <ul style="list-style-type: none"> • SDIs are describing the nature of the instruction that aligns with the needs of the child and supports achievement of annual goals. • Specific to the student individual needs. • Have the appropriate provider listed. • Each student with an IEP is assigned to an intervention specialist who maintains a caseload/workload per Operating Standards. • Ensure all Intervention Specialists are responsible for the provision of specially designed instruction. • Provide the general education teacher with the support, guidance, and time if they are supporting the intervention specialist with SDIs. • The skill stated in the measurable goal is also stated in the SDI. • <u><i>SDIs need to have the type of instruction the student will be provided, either whole group, small group, or one on one.</i></u> 	<p><input checked="" type="checkbox"/> Yes</p> <p>This finding needs to be addressed in a Corrective Action Plan.</p>

Record Review Item	Evidence of Findings	Evidence of Correction/Recommendations	Must be Addressed in CAP
DS-7	<p>34 CFR 300.320(a)(7) [Definition of individualized education program] OAC 3301-51-07 (H)(1)(i) [Definition of IEP]</p> <p>Three out of 32, or 9% of IEPs reviewed did not indicate the specific location where the specially designed instruction will be provided.</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 training has been completed.</p>	<input checked="" type="checkbox"/> No This finding does <u>not</u> need to be addressed in a Corrective Action Plan.
DS-8	<p>34 CFR 300.320(a)(7) [Definition of individualized education program] OAC 3301-51-07 (H)(1)(i) [Definition of IEP]</p> <p>All IEPs reviewed indicated the amount of time and frequency of the specially designed instruction.</p> <p><u>Interviews</u> Staff stated that 400 minutes monthly is a lot of time for one SDI. They want to change the time and frequency, so it reflects what each student needs to have for progress instead of using the same amount of time and frequency for all students.</p>	<p><u>Individual Correction</u> NA</p> <p><u>Systemic Correction</u> NA</p> <p><u>Opportunities for Improvement</u> Mayfield City Schools should consider how many minutes each student needs for each SDI. There were several students with 400 minutes or even 200 minutes per month for the delivery of specially designed instruction. When using “monthly” for frequency, it is recommended Mayfield City Schools also add how many sessions there will be for each month along with how long each session will last.</p>	<input checked="" type="checkbox"/> NA

Record Review Item	Evidence of Findings	Evidence of Correction/Recommendations	Must be Addressed in CAP
DS-9	<p>34 CFR 300.324(a)(2)(v) [Development of IEP] OAC 3301-51-01(B)(3) [Applicability of requirements and definitions]</p> <p>Six out of 22, or 27% of IEPs reviewed did not identify assistive technology to enable the child to be involved and make progress in the general education curriculum.</p> <p>Concerns Noted</p> <p>In some cases, the goal or SDI mentions items the student will be using but the items were not listed under Assistive Technology in Section 7. Also, there were a few records that stated the teacher will provide Assistive Technology Services, but it does not describe the services and is missing the time and frequency the services will be provided.</p>	<p>Individual Correction</p> <p>The educational agency must reconvene the teams of the IEPs identified as noncompliant to review assistive technology and/or services that would directly assist the child with a disability to increase, maintain, or improve their functional capabilities and include them on the IEP.</p> <p>Systemic Correction</p> <p>It is recommended that the educational agency review and revise its written procedures and practices regarding assistive technology. The Department will verify 100% compliance in this area through a review of new records that have been written after all training has been completed.</p> <p>Opportunities for Improvement</p> <p>Mayfield City School District might want to train their staff not to write cochlear implants as assistive technology.</p> <p>Also, it is suggested that using propriety names for items such as iPad and chrome books should not be written in any IEP. By stating specific named devices, the district will be held responsible for providing them to their students.</p>	<p><input checked="" type="checkbox"/> No This finding does <u>not</u> need to be addressed in a Corrective Action Plan.</p>
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>All IEPs reviewed identified accommodations provided to enable the child to be involved and make progress in the general education curriculum.</p> <p>Interviews</p> <p>Every staff member stated they are aware of what accommodations their students have stated in the IEP, and they provided them as written to their students.</p>	<p>Individual Correction</p> <p>NA</p> <p>Systemic Correction</p> <p>NA</p> <p>Opportunities for Improvement</p> <p>It is highly recommended that Mayfield City Schools continue to provide how, when and where each accommodation must be provided for students.</p>	<p><input checked="" type="checkbox"/> NA</p>

Record Review Item	Evidence of Findings	Evidence of Correction/Recommendations	Must be Addressed in CAP
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 13, or 23% of IEPs reviewed did not identify modifications to enable the child to be involved and make progress in the general education curriculum.</p> <p><u>Interviews</u> Modifications are not widely used or written within students' IEPs.</p> <p><u>Concerns Noted</u></p> <p>One IEP had "modified curriculum" listed but did not describe how the curriculum would be modified.</p> <p>One IEP had for modifications, "when deemed necessary by the teacher," what was missing was the actual events that must take place for the teacher to modify their curriculum.</p> <p>One IEP had for modification, "modifications made to the general education curriculum by the general ed teacher and or intervention specialist," again this needs to be very specific as to how the curriculum will be modified.</p>	<p><u>Individual Correction</u> The educational agency must reconvene the teams of the IEPs identified as noncompliant to review the modifications that would alter the amount or complexity of grade-level materials and would enable the child to be involved and make progress in the general education curriculum and include them in the IEP</p> <p><u>Systemic Correction</u> It is recommended that the educational agency review and revise its written procedures and practices regarding modifications. The Department will verify 100% compliance in this area through a review of new records that have been written after all training has been completed.</p> <p><u>Opportunities for Improvement</u> Mayfield City School District might consider providing their Intervention Specialists guidance on modifications.</p>	<input checked="" type="checkbox"/> No This finding does <u>not</u> need 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>Five out of 20, or 25 % of IEPs reviewed did not identify support for school personnel to enable the child to be involved and make progress in the general education curriculum.</p> <p><u>Concerns Noted</u></p> <p>Support for school personnel was not adult to adult consultation.</p>	<p><u>Individual Correction</u> The educational agency must reconvene the teams of the IEPs identified as noncompliant to review the supports for school personnel that were identified by the IEP team and define the supports on the IEP including who will provide the support and when it will take place.</p> <p><u>Systemic Correction</u> It is recommended that the educational agency review and revise its written procedures and practices supports for school personnel. The Department will verify 100% compliance in this area through a review of new records that have been written after all training has been completed.</p>	<input checked="" type="checkbox"/> No This finding does <u>not</u> need to be addressed in a Corrective Action Plan.

Record Review Item	Evidence of Findings	Evidence of Correction/Recommendations	Must be Addressed in CAP
DS-13	<p><i>OAC 3301-51-07 (H)(1)(h)(ii) [Definition of IEP]</i></p> <p>All applicable student records reviewed 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> NA</p> <p><u>Systemic Correction</u> NA</p>	<input checked="" type="checkbox"/> NA
DS-14	<p><i>OAC 3301-51-07(L)(2) [Development, review and revision of IEP]</i></p> <p>All student records reviewed showed evidence of progress reporting data collected and analyzed to monitor performance on each goal.</p> <p><u>Interviews</u></p> <p>Staff stated that they provide progress reports to their students that contain data on both the goal and the objectives.</p>	<p><u>Individual Correction</u> NA</p> <p><u>Systemic Correction</u> NA</p>	<input checked="" type="checkbox"/> NA
DS-15	<p><i>OAC 3301-51-07(L) [Development, review and revision of IEP]</i></p> <p>Four out of five, or 80% of applicable IEPs reviewed 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>Several of the students' present levels of academic and functional performance had current baseline data that was at or above the mastery criteria stated in the measurable goal.</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. The Department will verify 100% compliance in this area through a review of new records that have been written after all training has been completed.</p> <p>Mayfield City School District needs to develop a procedure of checks and balances to ensure revisions are made to IEPs when data shows a need for it either in the present levels of academic and functional performance or Progress Reports.</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
DS-16	<p>34 CFR 300.321(5) [IEP team] OAC 3301-51-07(I) [IEP team]</p> <p>One out of 32, or 3% of IEPs reviewed did not indicate that the IEP Team included a group of qualified professionals.</p> <p><u>Concerns Noted</u></p> <p>One IEP did not have a general education teacher sign and date the student's IEP, they were indicated on the PR-02 as a required member.</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><u>Systemic Correction</u></p> <p>It is recommended that the educational agency review and revise its written procedures and practices to ensure involvement of all required team members, including the parents, in IEP meetings. The Department will verify 100% compliance in this area through a review of new records that have been written after all training has been completed.</p>	<p><input checked="" type="checkbox"/> No This finding does <u>not</u> need to be addressed in a Corrective Action Plan.</p>

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 32, or 41% of IEPs reviewed did not include an explanation of the extent to which the child will not participate with nondisabled children in the general education classroom.</p> <p><u>Concerns Noted</u></p> <p>Some records reviewed did not describe supports and services that are needed for the student to be successful that cannot be provided within the general education classroom.</p> <p>In some cases, the least restrictive environment statement did not match the specially designed instruction in section 7 of the IEP.</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 students' needs in the general classroom with supplementary aids and services. • Document that the nature or severity of the disability is such that education in general education classes, even with the use of supplementary aids and services, cannot be achieved satisfactorily. • Describe potential harmful effects to the child or others, if applicable. <p><u>Systemic Correction</u></p> <p>The educational agency must submit evidence to the Department of written procedures and practices regarding the least restrictive environment placement decision process. The Department will verify 100% compliance in this area through a review of new records that have been written after all training has been completed.</p> <p>Mayfield City School District needs to develop a procedure of checks and balances to ensure LREs include an explanation of the extent to which the child will not participate with nondisabled children in the general education classroom.</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:

Reading and Math Specialists

It is strongly recommended that Mayfield City schools rethink recreating those two positions, so they can provide tier interventions. Intervention Specialists are not part of MTSS instruction.

Cochlear implants

As stated in the record review guide, "a medical device that is surgically implanted or the replacement of such a device is not included under the term, "assistive technology."

Co-Teaching in Elementary School Settings

Consider rethinking how co-teaching is being provided to students in the elementary setting. If SDI minutes are not being delivered during a co-teaching setting, list in the LRE and SDI location exactly where those SDI minutes are being delivered. This will provide clarity to all members of the IEP team.

Paraprofessional Professional Development

Consider providing all paraprofessionals with professional development that directly affects their day-to-day activities, so they are better prepared to handle students in their classroom. This would also include restraint and seclusion training, understanding different types of disabilities and how to instruct and handle certain behaviors.

Paraprofessionals Access to Same Goal

Consider allowing paraprofessionals to have access to Same Goal so they can have the information in the IEP for any student they are supporting. This will ensure section 7 of the IEP is being fully implemented providing FAPE to Mayfield City School District students.

Onboarding Process for new Hires

Consider developing an onboarding process for all new hires at Mayfield City School District that centers around the completion of certain LMS modules, and a review of Mayfield's Special Education Policies, Procedures, and Practices, therefore new hires understand Mayfield's Special Education Department guidelines.