

**Richmond Heights Local
IRN: 046599****Ohio Department of Education, Office for Exceptional Children
2019-2020 IDEA Monitoring Review Summary Report****Introduction**

The Ohio Department of Education's Office for Exceptional Children (OEC) would like to extend appreciation to the Richmond Heights Local staff for their efforts, attention and time committed to the completion of the review process.

The following report is a summary of the onsite review conducted by OEC on February 25 and 26, 2020, as part of its general supervision requirements under the Individuals with Disabilities Education Act (IDEA) and Am. Sub. H.B.1.

Overview

During the onsite review, OEC consultants monitor 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 and Administrator Interviews.

Data Sources

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

1. Public Parent Meeting and Written Comments

Richmond Heights Local School District mailed 121 OEC approved letters to all families with students with disabilities in the educational agency. OEC provided the educational agency with a public meeting announcement to post on the district website. Public parent meeting dates for all educational agencies selected for onsite reviews are also posted on the ODE website.

On Tuesday, February 25, 2020, OEC consultants held a public meeting for parents and other interested parties. Four parents and family members and one State Support Team (SST) Region 3 representative attended the public meeting. Attendees could speak to OEC representatives publicly in the meeting, speak to OEC representatives individually, provide written comments or both. Four attendees made comments during the public meeting. Written comment forms were available before, during and after the meeting. OEC received zero written comments.

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

2. Pre-Onsite Data Analysis

OEC conducted a comprehensive review which included district, building and grade level data; Special Education Performance Profile; Local Report Cards; Comprehensive Continuous Improvement Plan (CCIP); and Education Management Information System (EMIS) data. The data analysis assisted OEC in determining potential growth areas and educational agency strengths.

3. Record Review/IEP Verification

Prior to the onsite visit, OEC consultants reviewed 20 records of students with disabilities. OEC selected records of students with disabilities from a variety of disability categories and ages. Ten student records were selected for IEP verification in the classroom setting and some areas of concern were found regarding the implementation of the IEP within various classroom settings.

4. Staff/Administrative Interviews

On February 25 and 26, 2020, OEC consultants held 11 sessions of interviews with eight administrators and 33 teachers, school counselors, related services personnel and school psychologists. OEC interviews focused on the following review areas: Child Find; Delivery of Services; Least Restrictive Environment (LRE) and IEP alignment and Discipline.

Findings of Noncompliance

A finding is made when noncompliance is identified with evaluation team report (ETR) and/or individualized education program (IEP) requirements. A noncompliance level of 30% or greater in any single area or in specific areas of concern found during the onsite review activities, a Corrective Action Plan (CAP) will need to be developed to address those areas. All noncompliance identified by OEC as part of the review (listed by subject area in the *OEC's Review Findings and Educational Agency Required Actions Table*) must be corrected as indicated in the *Evidence of Correction/Required Actions* column.

OEC 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 OEC or can be accessed on ODE's website by using the keyword search "Monitoring". The CAP developed by the educational agency 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 <> within 30 school days from the date of this report. OEC will review the action plan submitted by the educational agency for approval. If OEC deems that a revision(s) is necessary, the educational agency will be required to revise and resubmit. The educational agency will be contacted by OEC and notified when the action plan has been approved.

CAP Due Date: January 28th, 2021

OEC Trainings

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

Completion of LMS Training Modules Due Date: January 28th, 2021

Individual Correction

The educational agency has **60 school days** from the date of this summary report to correct all identified findings of noncompliance for individual students, unless noted otherwise in the report. Detailed information on individual findings are provided in a separate report.

*Individual Correction Due Date: **March 15th, 2021***

CAP Activities and Systemic Correction

The educational agency will provide OEC with documentation verifying the educational agency's completion of all CAP activities and all systemic corrections noted in this summary report. OEC will verify systemic correction through the review of this documentation. If needed, OEC may request additional student records to review.

*Completion of CAP Activities and Systemic Correction Due Date: **August 27th, 2021***

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

For questions regarding the review, please contact:

- Barry Mahanes at 614-595-2376 or email barry.mahanes@education.ohio.gov; or
- Raymond McCain at 614-593-5477 or email raymond.mccain@education.ohio.gov.

OEC'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	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
CF-1	300.305(a) and 3301-51-11 (c)(1)(a)	<p><u>Record Review</u></p> <p>Preschool records were not reviewed.</p>	<p><u>Individual Correction</u></p> <p>NA</p> <p><u>Systemic Correction</u></p> <p>NA</p>	<input checked="" type="checkbox"/> NA
CF-2	3301-51-06	<p><u>Record Review</u></p> <p>Two evaluations did not appropriately document interventions provided to resolve concerns for the child performing below grade-level standards.</p> <p><u>Interviews</u></p> <p>Through interviews, it appears that teachers and other staff collect intervention data. However, it did not appear that there was a standard process of documenting and reporting interventions in the ETR.</p> <p><u>Other Considerations</u></p> <p>Initial ETRs must contain a summary of interventions implemented to include description, intensity, time and results. The district must provide a summary of actual interventions and not simply a list of possible accommodations. For reevaluations, if no additional interventions were provided, note that the student is making progress with the current IEP supports and services.</p>	<p><u>Individual Correction</u></p> <p>OEC 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 OEC of written procedures and practices regarding documentation of intervention and supports provided prior to completion of the initial and re-evaluation team report.</p>	<input checked="" type="checkbox"/> No The educational agency does <u>not</u> need to address this finding in a Corrective Action Plan.

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
CF-3	300.501(b)(1) 3301-51-06 (E)(2)(a)	<p><u>Record Review</u></p> <p>Four student records did not show evidence that the parent was afforded the opportunity to participate in the evaluation team planning meeting.</p> <p><u>Other Considerations</u></p> <p>The district documents attempts to involve the parent in the ETR planning meeting, and moves ahead with reevaluations after reasonable attempts to involve the parent. This process could be strengthened in the documentation phase by instituting a written, district-wide policy.</p>	<p><u>Individual Correction</u></p> <p>The educational agency must provide evidence that the parent was involved or provided the opportunity to participate in the evaluation planning process.</p> <p>The evidence may include evaluation planning form, prior written notice, parent invitation, referral form or communication log. If the educational agency cannot provide documentation that the parent was involved or provided the opportunity to participate in the evaluation planning process, the educational agency must conduct a reevaluation planning meeting with the parent.</p> <p><u>Systemic Correction</u></p> <p>The educational agency must submit evidence to OEC of written procedures and practices that include the parent in the evaluation planning process.</p>	<p><input checked="" type="checkbox"/> No</p> <p>The educational agency does <u>not</u> need to address this finding in a Corrective Action Plan.</p>
CF-4	300.300	<p><u>Record Review</u></p> <p>Nine student records did not provide evidence of parental consent obtained prior to new testing.</p> <p><u>Interviews</u></p> <p>Although attempts are made to obtain parental consent for evaluations involving new testing, this process could be strengthened to ensure documented parent permission through a written, district-wide policy.</p> <p><u>Other Considerations</u></p> <p>Parents must give informed, written consent for any new evaluation of their student for purposes of evaluating or reevaluating eligibility for special education services.</p>	<p><u>Individual Correction</u></p> <p>The educational agency must provide evidence that the parent provided informed, written consent for evaluation, based upon the planning form OR the agency must show documented repeated attempts to obtain informed, written consent to which the parent did not respond.</p> <p>The evidence may include, prior written notice, parent invitation, communication log, or other documented attempts to obtain parental informed, written consent.</p> <p>If the educational agency cannot provide documentation that the parent provided informed, written consent for evaluation, or did not respond to repeated attempts to obtain consent, the agency must conduct a reevaluation including documentation of parental consent.</p>	<p><input checked="" type="checkbox"/> Yes</p> <p>The educational agency needs to address this finding in a Corrective Action Plan.</p>

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
			<u>Systemic Correction</u> The educational agency must submit evidence to OEC of written procedures and practices for obtaining parental consent obtained prior to new testing or policies and practices for moving forward when parents will not participate.	
CF-5	300.304(c)(4) 3301-51-01 3301-51-06 (E)(2)(a)	<u>Record Review</u> Eleven (11) evaluations did not provide evidence that the evaluation addresses all areas related to the suspected disability. <u>Interviews</u> Staff members indicated that they would benefit from guidance for completing Part 1 assessments. <u>Other Considerations</u> 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 one evaluator’s assessment. Additionally, if an assessment area or type is not included on the planning form for parent consent, it should not be a part of the ETR process without getting parent permission to proceed, unless the area of assessment is based upon existing data only.	<u>Individual Correction</u> The educational agency will convene the ETR teams to conduct a reevaluation and provide evidence that the evaluation addresses all areas related to the suspected disability. <u>Systemic Correction</u> The educational agency must submit evidence to OEC of written procedures and practices to provide evidence that the evaluation addresses all areas related to the suspected disability.	<input checked="" type="checkbox"/> Yes The educational agency needs to address this finding in a Corrective Action Plan.
CF-6	300.306(c)	<u>Record Review</u> Sixteen (16) evaluations did not show evidence of clearly stating the summary of assessment results. <u>Other Considerations</u> The information in Part 2 of the ETR must be clear and concise and not be a copy and paste of information from Part 1. The language should be written in terms that the parents, as well as involved professionals, can understand and use to create goals and services in the IEP. All areas addressed in Part 1 must be summarized in Part 2.	<u>Individual Correction</u> 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. <u>Systemic Correction</u> The educational agency must submit evidence to OEC of written procedures and practices regarding summary of data and assessment results.	<input checked="" type="checkbox"/> Yes The educational agency needs to address this finding in a Corrective Action Plan.

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
CF-7	300.306(c)	<p><u>Record Review</u></p> <p>Twelve (12) evaluation team reports did not contain a clear and succinct description of educational needs.</p> <p><u>Other Considerations</u></p> <p>Educational needs were sometimes generic in nature and did not address the student's individualized needs. Sometimes educational needs were stated in Part 1 but were not included in the Part 2 summary.</p>	<p><u>Individual Correction</u></p> <p>The educational agency will reconvene the ETR teams to conduct a reevaluation and provide a clear and succinct description of the student's educational needs. The IEP team must consider the results of this reevaluation.</p> <p><u>Systemic Correction</u></p> <p>The educational agency must submit evidence to OEC of written procedures and practices regarding description of educational needs.</p>	<p><input checked="" type="checkbox"/> Yes</p> <p>The educational agency needs to address this finding in a Corrective Action Plan.</p>
CF-8	300.306(c)	<p><u>Record Review</u></p> <p>Six evaluation team reports did not contain specific implications for instruction.</p> <p><u>Other Considerations</u></p> <p>In some cases, there was no description or a lack of clarity of the implications for instruction (the implications description was generic in nature and did not address the specific needs of the child).</p>	<p><u>Individual Correction</u></p> <p>The educational agency will reconvene the ETR teams to conduct a reevaluation and provide a clear description of specific implications for instruction. The IEP team must consider the results of this reevaluation.</p> <p><u>Systemic Correction</u></p> <p>The educational agency must submit evidence to OEC of written procedures and practices regarding implications for instruction.</p>	<p><input checked="" type="checkbox"/> Yes</p> <p>The educational agency needs to address this finding in a Corrective Action Plan.</p>
CF-9	300.306(a)(1) 3301-51-01 (B)(21)	<p><u>Record Review</u></p> <p>Six evaluations 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>Other Considerations</u></p> <p>It is recommended that Richmond Heights Local develop a procedure to ensure all members of the Planning/ETR team are in attendance or given the opportunity to participate.</p>	<p><u>Individual Correction</u></p> <p>The educational agency must provide evidence that the ETR teams and other qualified professionals, as appropriate, participated in the determination of eligibility and educational needs. If not, the ETR team must reconvene and provide OEC evidence of group participation.</p> <p><u>Systemic Correction</u></p> <p>The educational agency must submit evidence to OEC of written procedures and practices regarding the eligibility determination process.</p>	<p><input checked="" type="checkbox"/> Yes</p> <p>The educational agency needs to address this finding 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	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
DS-1	SPP Indicator 13 300.320 (b) 3301-51-07 (H)(2)	<p><u>Record Review</u></p> <p>Seven IEPs did not show evidence that the postsecondary transition plan met all eight required elements of the IDEA for the student, specifically in the following area(s):</p> <ol style="list-style-type: none"> 1. There are appropriate measurable postsecondary goal(s). 2. The postsecondary goals are updated annually. 3. The postsecondary goals were based on age appropriate transition assessment (AATA). 4. There are transition services that will reasonably enable the student to meet the postsecondary goal(s). 5. The transition services include courses of study that will reasonably enable the student to meet the postsecondary goal(s). 6. The annual goal(s) are related to the student's transition service needs. 7. There is evidence the student was invited to the IEP Team Meeting where transition services were discussed. 8. When appropriate, there is evidence that a representative of any participating agency was invited to the IEP Team Meeting. <p><u>Interviews</u></p> <p>During interviews, district staff seemed to be knowledgeable and proactive regarding post-secondary transition programming. This, however, did not translate into all student records.</p>	<p><u>Individual Correction</u></p> <p>The educational agency must reconvene the teams to review and correct the postsecondary transition plan for the IEPs identified as noncompliant or provide documentation of the student's withdrawal date from the educational agency.</p> <p><u>Systemic Correction</u></p> <p>The educational agency must submit evidence to OEC of written procedures and practices regarding transition services.</p>	<p><input checked="" type="checkbox"/> Yes</p> <p>The educational agency needs to address this finding in a Corrective Action Plan.</p>

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
		<p>Reviewers noted that when this section of the record was compliant, they were only minimally so and did not truly represent available supports and services.</p> <p><u>Other Considerations</u></p> <p>Training must be provided to all ETR and IEP members responsible for assessing and writing transition plans to ensure they are compliant and beneficial to the student. Training should address Age Appropriate Transition Assessments (AATAs) to include preferences, interests, needs and strengths (PINS) in the development of Postsecondary Transition Plan.</p>		
DS-2	300.320(a)(1)	<p><u>Record Review</u></p> <p>Twenty (20) IEPs 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>There appears to be a lack of understanding among staff members regarding the required contents of the present levels for IEP goals, especially regarding data collection to develop measurable goals. This points to an opportunity for training and technical assistance in this area.</p> <p><u>Other Considerations</u></p> <p>Often, the present levels of performance did not relate to the annual goal, and measurable baseline data were missing. An internal monitoring and review system would be very helpful to promote compliance in present levels of performance.</p>	<p><u>Individual Correction</u></p> <p>The educational agency must reconvene the IEP teams of the IEPs identified as noncompliant to review and amend the PLOP related to each goal to include:</p> <ul style="list-style-type: none"> • Summary of current daily academic/behavior and/ or functional performance (strengths and needs) compared to expected grade level standards in order to provide a frame of reference; • PLOP must relate to the goal measurement • Baseline data provided for developing a measurable goal. <p><u>Systemic Correction</u></p> <p>The educational agency must submit evidence to OEC of written procedures and practices regarding the review of current academic/functional data when writing IEPs.</p>	<p><input checked="" type="checkbox"/> Yes</p> <p>The educational agency needs to address this finding in a Corrective Action Plan.</p>

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
DS-3	300.320(a)(2)(i)	<p><u>Record Review</u></p> <p>Nineteen (19) IEPs did not contain measurable annual goals.</p> <p><u>Other Considerations</u></p> <p>Measurable goals in the IEPs reviewed were inconsistent in quality and content. Often one or more required elements were missing. An internal monitoring and review system would be very helpful to promote compliance in annual IEP goals.</p>	<p><u>Individual Correction</u></p> <p>The educational agency must reconvene the teams of the IEPs identified as noncompliant to review and amend annual goals to contain the following critical elements:</p> <ol style="list-style-type: none"> 1. Clearly <u>defined behavior</u>: the specific action the child will be expected to perform. 2. The <u>condition</u> (situation, setting or given material) under which the behavior is to be performed. 3. <u>Performance criteria</u> desired: the level the child must demonstrate for mastery and the number of times the child must demonstrate the skill or behavior. <p><u>Systemic Correction</u></p> <p>The educational agency must submit evidence to OEC of written procedures and practices regarding the development of measurable annual IEP goals.</p>	<p><input checked="" type="checkbox"/> Yes</p> <p>The educational agency needs to address this finding in a Corrective Action Plan.</p>
DS-4	300.320(a)(2)(i)	<p><u>Record Review</u></p> <p>One IEP 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 team of the IEP identified as noncompliant to review and amend the IEP. Annual goals must address the academic needs of the child unless the team provides evidence that the goals were prioritized based on the severity of the needs of the child.</p> <p><u>Systemic Correction</u></p> <p>The educational agency must submit evidence to OEC of written procedures and practices regarding the IEP process of addressing identified academic needs.</p>	<p><input checked="" type="checkbox"/> No</p> <p>The educational agency does <u>not</u> need to address this finding in a Corrective Action Plan.</p>

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
DS-5	300.320(a)(2)(i)	<p><u>Record Review</u></p> <p>One IEP 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 team of the IEP identified as noncompliant to review and amend the IEP. Annual goals must address the functional needs of the child unless the team provides evidence that the goals were prioritized based on the severity of the needs of the child.</p> <p><u>Systemic Correction</u></p> <p>The educational agency must submit evidence to OEC of written procedures and practices regarding the IEP process of addressing identified functional needs.</p>	<p><input checked="" type="checkbox"/> No</p> <p>The educational agency does <u>not</u> need to address this finding in a Corrective Action Plan.</p>
DS-6	300.320(a)(4) 3301-51-07 (H)(1)(e)(i)	<p><u>Record Review</u></p> <p>Nine IEPs did not contain a statement of specially designed instruction that addresses the individual needs of the child and supports the annual goals.</p> <p><u>Interviews</u></p> <p>Intervention specialists and general educators described that specially designed instruction (SDI) is individualized to students but struggled to explain what makes this instruction specialized.</p> <p><u>Other Considerations</u></p> <p>In some cases, the specially designed instruction was generic in nature and not individualized to the needs of the student described in the present levels and goals. Other examples lacked specific instructional reference and only listed accommodations.</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 OEC of written procedures and practices regarding the IEP process of determining specially designed instruction.</p>	<p><input checked="" type="checkbox"/> Yes</p> <p>The educational agency needs to address this finding in a Corrective Action Plan.</p>

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
DS-7	300.320(a)(7) 3301-51-07 (H)(1)(i)	<p><u>Record Review</u> Thirteen (13) IEPs did not indicate the specific location where the specially designed instruction will be provided.</p> <p><u>Other Considerations</u> Locations must be separated for amount of time and frequency in each location.</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> The educational agency must submit evidence to OEC of written procedures and practices regarding the IEP process of determining the location where specially designed instruction will occur.</p>	<input checked="" type="checkbox"/> Yes The educational agency needs to address this finding in a Corrective Action Plan.
DS-8	300.320(a)(7) 3301-51-07 (H)(1)(i)	<p><u>Record Review</u> Eight IEPs did not indicate the amount of time and frequency of the specially designed instruction.</p> <p><u>Other Considerations</u> Time and frequency must relate to one specific provider. Several of the records reviewed had two providers listed for one specially designed instruction. Intervention specialists and related service providers are both able to deliver specially designed instruction; however, if a general education teacher is assigned to assist in the delivery of specially designed instruction, they must be included in the supports for school personnel box.</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> The educational agency must submit evidence to OEC of written procedures and practices regarding the IEP process of determining the amount and frequency of specially designed instruction to be provided.</p>	<input checked="" type="checkbox"/> Yes The educational agency needs to address this finding in a Corrective Action Plan.
DS-9	300.320(a)(4) 3301-51-07 (H)(1)(e)	<p><u>Record Review</u> One IEP did not identify related services that address the needs of the child and support the annual goals.</p>	<p><u>Individual Correction</u> The educational agency must reconvene the team of the IEP identified as noncompliant to review and amend the IEP to include related services that were identified as needed in the IEP.</p> <p><u>Systemic Correction</u> The educational agency must submit evidence to OEC of written procedures and practices regarding the IEP process of addressing identified related service needs.</p>	<input checked="" type="checkbox"/> No The educational agency does not need to address this finding in a Corrective Action Plan.

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
DS-10	300.320(a)(7) 3301-51-07 (H)(1)(i)	<p><u>Record Review</u></p> <p>Nine IEPs did not indicate the location where the related services will be provided.</p> <p><u>Other Considerations</u></p> <p>Locations must be separated for amount of time and frequency in each.</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 to include the location where the related services will be provided.</p> <p><u>Systemic Correction</u></p> <p>The educational agency must submit evidence to OEC of written procedures and practices regarding the IEP process of determining the location where related services will occur.</p>	<p><input checked="" type="checkbox"/> Yes</p> <p>The educational agency needs to address this finding in a Corrective Action Plan.</p>
DS-11	300.320(a)(7) 3301-51-07 (H)(1)(i)	<p><u>Record Review</u></p> <p>One IEP did not indicate the amount of time, duration and frequency of the related services to be provided.</p>	<p><u>Individual Correction</u></p> <p>The educational agency must reconvene the team of the IEP identified as noncompliant to review and amend on the IEP the amount of time and frequency of the related services to be provided.</p> <p><u>Systemic Correction</u></p> <p>The educational agency must submit evidence to OEC of written procedures and practices regarding the IEP process of determining the amount and frequency of related services to be provided.</p>	<p><input checked="" type="checkbox"/> No</p> <p>The educational agency does not need to address this finding in a Corrective Action Plan.</p>
DS-12	300.324(a)(2)(v) 3301-51-01(B)(3)	<p><u>Record Review</u></p> <p>Two IEPs did not identify assistive technology to enable the child to be involved and make progress in the general education curriculum.</p> <p><u>Other Considerations</u></p> <p>Assistive technology must describe what will be provided to the student, for what purpose, under what conditions, how often, and to what extent. If assistive technology is recommended within the ETR or IEP, it should be included in the assistive technology section.</p>	<p><u>Individual Correction</u></p> <p>The educational agency must reconvene the teams of the IEPs identified as noncompliant to review assistive technology and/or services that would directly assist the child with a disability to increase, maintain, or improve their functional capabilities and include them on the IEP.</p> <p><u>Systemic Correction</u></p> <p>The educational agency must submit evidence to OEC of written procedures and practices regarding assistive technology.</p>	<p><input checked="" type="checkbox"/> Yes</p> <p>The educational agency needs to address this finding in a Corrective Action Plan.</p>

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
DS-13	300.320(a)(6)(i) 3301-51-07 (H)(1)(g)	<p><u>Record Review</u></p> <p>Twelve (12) IEPs did not identify accommodations provided to enable the child to be involved and make progress in the general education curriculum.</p> <p><u>Other Considerations</u></p> <p>IEP accommodations were often not explained regarding conditions and extent of the accommodation. Phrases like “as needed” and “may need” are not acceptable in describing accommodations.</p>	<p><u>Individual Correction</u></p> <p>The educational agency must reconvene the teams of the IEPs identified as noncompliant to review the accommodations that would directly assist the child to access the course content without altering the scope or complexity of the information taught and include them on the IEP.</p> <p><u>Systemic Correction</u></p> <p>The educational agency must submit evidence to OEC of written procedures and practices regarding accommodations.</p>	<input checked="" type="checkbox"/> Yes <p>The educational agency needs to address this finding in a Corrective Action Plan.</p>
DS-14	300.320(a)(4) 3301-51-07 (H)(1)(e)	<p><u>Record Review</u></p> <p>Four IEPs did not identify modifications to enable the child to be involved and make progress in the general education curriculum.</p> <p><u>Other Considerations</u></p> <p>The extent of modifications must be specific and clearly explained. List the use of Ohio’s Learning Standards—Extended for students with a modified curriculum.</p>	<p><u>Individual Correction</u></p> <p>The educational agency must reconvene the teams of the IEPs identified as noncompliant to review the modifications that would alter the amount or complexity of grade-level materials and would enable the child to be involved and make progress in the general education curriculum and include them in the IEP</p> <p><u>Systemic Correction</u></p> <p>The educational agency must submit evidence to OEC of written procedures and practices regarding modifications.</p>	<input checked="" type="checkbox"/> Yes <p>The educational agency needs to address this finding in a Corrective Action Plan.</p>

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
DS-15	300.320(a)(4) 3301-51-07 (H)(1)(e)	<p><u>Record Review</u></p> <p>Seven IEPs did not identify supports for school personnel to enable the child to be involved and make progress in the general education curriculum.</p> <p><u>Other Considerations</u></p> <p>There is a need to better describe adult-to-adult consultation. Clarify the support to include who will receive, who will deliver, when the support will be provided, and for what purpose. For example, the intervention specialist consults with the general education teachers and paraprofessionals on progress monitoring for a particular goal or goals. General education teachers/paraprofessionals would then be listed as receiving support for school personnel.</p>	<p><u>Individual Correction</u></p> <p>The educational agency must reconvene the teams of the IEPs identified as noncompliant to review the supports for school personnel that were identified by the IEP team and define the supports on the IEP including who will provide the support and when it will take place.”</p> <p><u>Systemic Correction</u></p> <p>The educational agency must submit evidence to OEC of written procedures and practices regarding supports for school personnel.</p>	<input checked="" type="checkbox"/> Yes <p>The educational agency needs to address this finding in a Corrective Action Plan.</p>
DS-16	3301-51-07 (H)(1)(h)(ii)	<p><u>Record Review</u></p> <p>One student record did not have a justification statement explaining why the student cannot participate in the regular assessment and why the alternate assessment is appropriate for the student.</p>	<p><u>Individual Correction</u></p> <p>The educational agency must reconvene the team of the IEP identified as noncompliant to review and determination if the alternate assessment is appropriate for the student.</p> <p><u>Systemic Correction</u></p> <p>The educational agency must submit evidence to OEC of written procedures and practices regarding the determination of participation in the AASCD</p>	<input checked="" type="checkbox"/> No <p>The educational agency does not need to address this finding in a Corrective Action Plan.</p>
DS-17	3301-51-07(L)(2)	<p><u>Record Review</u></p> <p>Twelve IEPs did not contain measurable annual goals and services/placement consistent with progress made.</p> <p><u>Other Considerations</u></p> <p>Without clearly documented progress monitoring, reflecting the specific goal measurement with quantitative data, student progress cannot be accurately assessed.</p>	<p><u>Individual Correction</u></p> <p>None</p> <p><u>Systemic Correction</u></p> <p>The educational agency must submit evidence to OEC of written procedures and practices regarding measurable annual goals and services consistent with progress made.</p>	<input checked="" type="checkbox"/> Yes <p>The educational agency needs to address this finding in a Corrective Action Plan.</p>

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
DS-18	3301-51-07(L)	<p><u>Record Review</u></p> <p>Six (6) IEPs did not show evidence that revisions were made based on data indicating changes in student needs or abilities.</p> <p><u>Other Considerations</u></p> <p>The results of the most recent evaluation must be considered in the development of an IEP within a reasonable amount of time (OEC recommends 30 days) either by amending the IEP or reconvening the IEP team to consider new information. (3301-51-07 (L)(a)(iii))</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 OEC of written procedures and practices regarding using data to revise IEPs based on changes in student needs or abilities.</p>	<p><input checked="" type="checkbox"/> Yes</p> <p>The educational agency needs to address this finding in a Corrective Action Plan.</p>
DS-19	300.321(5) 3301-51-07(I)	<p><u>Record Review</u></p> <p>Three (3) IEPs did not indicate that the IEP Team included a group of qualified professionals.</p>	<p><u>Individual Correction</u></p> <p>For the IEPs identified as noncompliant, the educational agency must:</p> <ul style="list-style-type: none"> • Provide documentation that the parent was informed prior to the IEP meeting that the person qualified to interpret the instructional implications of evaluation results would not participate in the meeting, and • Provide a written excuse signed by the parents and the educational agency that allowed the person qualified to interpret the instructional implications of evaluation results not to be in attendance at the IEP meeting, or • Reconvene the IEP team to review the IEP with all required members present. <p><u>Systemic Correction</u></p> <p>The educational agency must submit evidence to OEC of written procedures and practices regarding the involvement of people qualified to interpret the instructional implications of evaluation results in the IEP process</p>	<p><input checked="" type="checkbox"/> No</p> <p>The educational agency does not need to address this finding in a Corrective Action Plan.</p>

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	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
LRE-1	300.114 300.320(a)(5) 3301-51-07 (H)(1)(f)	<p><u>Record Review</u></p> <p>Fifteen (15) IEPs 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>Interviews</u></p> <p>Interviews revealed difficulties with describing or implementing a true co-teaching model with co-planning that was consistent across all buildings. Other respondents described limited placement choices across the continuum of alternative settings based upon individual student needs.</p> <p>Intervention Specialists are sometimes pulled out of classrooms, which may cause limited access to the general education curriculum for students with disabilities.</p> <p><u>Other Considerations</u></p> <p>Justify the need to deliver services outside the general education classroom based on individualized student need. Student needs should drive decisions regarding Least Restrictive Environment. In order for a classroom setting to be considered a general education class, the percentage of students with disabilities cannot be greater than that of non-disabled peers.</p>	<p><u>Individual Correction</u></p> <p>The educational agency must reconvene the teams of the IEPs identified as noncompliant to review and include a justification as to why the child was removed from the general education classroom.</p> <p>The justification should:</p> <ul style="list-style-type: none"> • Be based on the needs of the child, not the disability. • Reflect that the team has given adequate consideration to meeting the student's needs in the general classroom with supplementary aids and services. • Document that the nature or severity of the disability is such that education in general education classes, even with the use of supplementary aids and services, cannot be achieved satisfactorily. • Describe potential harmful effects to the child or others, if applicable. <p><u>Systemic Correction</u></p> <p>The educational agency must submit evidence to OEC of written procedures and practices regarding the least restrictive environment placement decision process.</p>	<p><input checked="" type="checkbox"/> Yes</p> <p>The educational agency needs to address this finding in a Corrective Action Plan.</p>

Commendations

- The district has implemented co-teaching district wide and general education teachers and intervention specialists both described positive student gains as a result, especially socially and emotionally for students with disabilities. Richmond Heights Local staff expressed a commitment to providing equity for all students.
- Interviews and the Public Parent Meeting revealed that the district strives to develop and maintain relationships with families. District staff actively welcome parent input and participation in the educational experience.

Opportunities for Improvement

- During the interview sessions, both intervention specialists and general education teachers expressed a need for both professional learning and support at the building level for a co-teaching model to be successful. They also voiced the need of a common planning time to be successful. Interviews revealed limited access to content area coursework for students with disabilities. Administrative decisions and a lack of instructional resources limit student access to a Least Restrictive Environment, including available courses, with appropriate supports provided. The district should consider how specially designed instruction will be delivered within a comprehensive and appropriate continuum of placements that is driven by student needs. Offering a full continuum of placements may also reduce the number of students who are placed outside of the district because their needs may be able to be met within Richmond Heights Local Schools.
- There is an opportunity for Richmond Heights Local School District to enhance their Multi-Tier System of Supports (MTSS) process by further developing Tier 1, 2, and 3 interventions. The district could benefit from developing interventions for academic and/or behavior specific skills with decision rules for implementing all interventions consistently. These decision rules could be developed as part of district procedures and practices.
- Develop and implement PBIS consistently throughout the district to create a positive school environment to promote student growth and learning. The district should also develop and implement consistent procedures for restraint and seclusion consistent with the Ohio Revised Code.
- Implementing foundational strategies with fidelity will result in lasting change for the outcomes of Richmond Heights students. Developing internal monitoring processes and procedures will ensure compliance of records and understanding of how best to meet the needs students with disabilities.