

Toledo Public School District
IRN: 044909

Ohio Department of Education and Workforce
Office for Exceptional Children
2023-2024 IDEA Monitoring Review Summary Report

Introduction

The Ohio Department of Education and Workforce, Office for Exceptional Children, would like to extend appreciation to the Toledo Public School District staff for their efforts, attention and time committed to the completion of the review process.

Definition of terms in this document:

Individual Corrections or Record Corrections refers to the correction of Individualized Education Programs (IEPs), Evaluation Team Reports (ETRs) and other special education records that were reviewed by the Department and found to be noncompliant.

Systemic Corrections refers to noncompliance within the larger systems at work to implement IDEA within the district. This includes but is not limited to Systemic Correction of records and special education procedures and practices to document ongoing compliance with IDEA requirements.

Overview

The following report is a summary of the onsite review conducted by the Department on March 12-15, 2024, and March 26-27, 2024, as part of its general supervision requirements under the Individuals with Disabilities Education Act (IDEA).

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

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

Onsite reviews are targeted to include the following specific areas:

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

Data Sources

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

1. Parent Input

Toledo Public School District mailed 4,995 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 11 comments, eight emails and three phone calls.

2. Pre-Onsite Data Analysis

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

3. Record Review/IEP Verification

Prior to the onsite visit, the Department consultants reviewed 54 records of school-age students with disabilities. The Department consultants selected records of students with disabilities from a variety of disability categories and ages. Twenty-two (22) student records were selected for IEP verification in the classroom setting. Overall, the IEP verifications went well. There was an authentic respect between student and staff (i.e., intervention specialist, general education teacher, related services provider, paraprofessionals, etc.) throughout the sessions that were observed. The interactions were mutually courteous and productive. Intervention specialists and related service providers were providing additional items, such as accommodations and other methods to support the students that were not documented in the student's IEP. In some cases, there were some missed opportunities for staff to reinforce the student's measurable annual goal. Please see the record review item section for specific information.

4. Staff/Administrative Interviews

On March 12 – 15 and March 26-27, 2024, the Department consultants held 50 sessions of interviews with 108 administrators/school counselors and 277 teachers, related services personnel, school psychologists, and paraprofessionals. The Department interviews focused on the following review areas: Child Find; Delivery of Services; Least Restrictive Environment (LRE) and IEP alignment and Discipline.

Strengths/Commendations:

There are several layers of special education support that have been developed in recent years to include Student Assistance Center (SAC) Directors, Special Assignment Staff, etc.

The longevity of staff speaks to the culture of the district and how staff are dedicated to their craft to support students at various levels. As staff participated during the interview sessions, it became clear that there was a sense of passion and pride in their work. Related service providers communicate well with staff and parents. Intervention specialists overall have a good rapport with the general education teachers to check in about students with disabilities and how to support them. There is no formal planning time, but they find ways to connect. Paraprofessionals seem to have good relationships with their classroom teachers.

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

CAP Due Date: N/A (district will be provided with a directive corrective action plan (CAP)).

Department Trainings

As part of the Department monitoring process, Toledo Public School District personnel, as identified by the Department, are required to complete the OEC Required Special Education Essentials training modules within the Learning Management System (LMS). These training modules must be completed within 30 school days from the date of this report. The Department will provide specific instructions on completing these training modules during the Summary Report presentation. Participants must achieve 80% or more on each quiz. Participants who do not achieve at least 80% will be contacted by the State Support Team (SST) for additional training.

Completion of LMS Training Modules Due Date: October 1, 2024*

**Office for Exceptional Children has provided some flexibility to the LMS modules and proposed in-person training(s). The date has not been mutually agreed upon at this time.*

Individual Correction

The educational agency has **60 school days** from the date of this summary report to correct all identified findings of noncompliance for individual students whose records were selected and reviewed by the Department during the onsite review unless noted otherwise in the report. Detailed information on individual findings is provided in a separate report.

Individual Correction Due Date: November 15, 2024

CAP Activities and Systemic Correction

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

Completion of CAP Activities and Systemic Correction Due Date: April 11, 2025

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: Joe Kujkowski, the Department's IDEA Monitoring Contact, at 614-623-2986, toll-free at (877) 644-6338, or by e-mail at joseph.kujkowski@education.ohio.gov.

The Department’s Review Findings and Educational Agency Required Actions

Component 1: Child Find

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

Record Review Item	Evidence of Findings	Evidence of Corrections/Recommendations	Must be Addressed in CAP
CF-2	<p><u>OAC 3301-51-06 [Evaluations]</u></p> <p>Thirty-five (35) out of 52 applicable evaluations reviewed, or 67%, did not appropriately document interventions provided to resolve concerns for the child performing below grade-level standards.</p> <p><u>Interviews</u></p> <p>During interviews, it was noted that the Multi-Tiered System of Supports (MTSS) process has not been fully implemented as staff expressed frustration and confusion about the framework. In most buildings it was shared that they “do not have time to meet anymore.” Staff requested a flow chart to guide the work and expectations. In buildings where the Intervention Response Team (IRT) is not occurring on a routine basis. The reoccurring reason is lack of and/or no coverage for teachers. Staff requested additional training.</p> <p><u>Concerns Noted</u></p> <p>Although interventions were provided through various processes across the district, the results are not uniformly documented in ETRs. Frequently, the district’s initial ETRs did not contain a summary of interventions implemented to include description, intensity, time, and results. For reevaluations, if no additional interventions were provided, simply providing a statement that it was determined by the ETR team that the student is making adequate progress with current special education supports and services required in the IEP is sufficient.</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.</p> <p>Toledo Public School District must develop a procedure of checks and balances to ensure interventions that are being provided to students are implemented with fidelity, which includes documenting the following required components:</p> <ul style="list-style-type: none"> • A description of the research-based intervention(s) used. • How long the intervention(s) was provided (how many weeks). • The intensity of the intervention(s) – how often, and for how many minutes. • A description of the results compared to the baseline data. • The decision as a result of the intervention(s). <p>The Department will verify 100% compliance in this area through a review of new records that have been written after all trainings have been completed.</p> <p>Toledo Public School District must develop an internal monitoring process to ensure that appropriate documentation of interventions were provided to resolve concerns for the child performing grade-level standards.</p>	<p><input checked="" type="checkbox"/> Yes</p> <p>This finding needs to be addressed in a Corrective Action Plan.</p>

Record Review Item	Evidence of Findings	Evidence of Corrections/Recommendations	Must be Addressed in CAP
		<p>Based on interviews and discussions with staff members, Toledo Public School District will continue to redefine their Multi-Tiered System of Supports (MTSS) process to streamline their practices and develop a formal method to document their interventions. When school teams make data-based decisions on what supports students need, they should include a diverse set of perspectives, including paraprofessionals. The district should emphasize the paraprofessional's role at every level of the MTSS framework and provide them with ongoing training to effectively deliver the interventions.</p> <p>With the collaboration and coordination of at least one SST member and OEC Urban Support member, the district will receive professional development and targeted technical assistance in this area.</p>	
CF-3	<p>34 CFR 300.501(b) [Parent participation in meetings] and OAC 3301-51-06 (E)(2)(a) [Evaluation procedures].</p> <p>Twelve (12) out of 52 applicable student records reviewed, or 23%, did not show evidence that the parent was afforded the opportunity to participate in the evaluation team planning process.</p> <p><u>Interviews</u></p> <p>In most cases, staff are not involved with the planning process. Therefore, they are unable to provide input into the planning of the evaluation team report.</p> <p><u>Concerns Noted</u></p> <p>Several records did not contain evidence (i.e., OP-9, PR-01, etc.) to show attempts to obtain parent/surrogate participation.</p>	<p><u>Individual Correction</u></p> <p>The educational agency must provide evidence that the parent was involved or provided the opportunity to participate in the evaluation planning process. The evidence may include evaluation planning form, prior written notice, parent invitation, referral form or communication log.</p> <p><u>Systemic Correction</u></p> <p>It is recommended that the educational agency review and revise its written procedures and practices that include the parent in the evaluation planning process. The Department will verify 100% compliance in this area through a review of new records that have been written after all trainings have been completed.</p> <p><u>Opportunities for Improvement</u></p> <p>Toledo Public School District should develop an internal monitoring process which contains procedures to ensure parents/guardians are provided the opportunity to be involved in the ETR planning process to establish informed parental consent.</p>	<p><input checked="" type="checkbox"/> No</p> <p>This finding does <u>not</u> need to be addressed in a Corrective Action Plan.</p>

Record Review Item	Evidence of Findings	Evidence of Corrections/Recommendations	Must be Addressed in CAP
CF-4	<p>34 CFR 300.300 [Parental Consent]</p> <p>Sixteen (16) out of 52 applicable student records reviewed, or 31%, did not provide evidence of parental consent obtained prior to evaluation.</p> <p><u>Interviews</u></p> <p>Overall, the staff has a sense that the district makes a strong effort to obtain informed parental consent.</p> <p><u>Concerns Noted</u></p> <p>Several records indicated that some assessments were completed prior to securing informed consent and in some cases, there were additional assessments (i.e., communicative status, gross motor, adaptive behavior, etc.) that were conducted but not documented on the planning form.</p>	<p><u>Individual Correction</u></p> <p>The educational agency must provide evidence that the parent provided informed, written consent for evaluation, based upon the planning form. Or the agency must show documented repeated attempts to obtain informed, written consent to which the parent did not respond.</p> <p>The evidence may include prior written notice, parent invitation, communication log, or other documented attempts to obtain parental informed, written consent.</p> <p>If the educational agency cannot provide documentation that the parent provided informed, written consent for evaluation, or did not respond to repeated attempts to obtain consent, the agency must conduct a reevaluation including documentation of parental consent.</p> <p><u>Systemic Correction</u></p> <p>The educational agency must submit evidence to the Department of written procedures and practices for obtaining informed parental consent.</p> <p>Toledo Public School District must develop an internal monitoring process which contains procedures to ensure written informed parental consent is obtained prior to an evaluation.</p> <p>The Department will verify 100% compliance in this area through a review of new records that have been written after all trainings have been completed.</p> <p>With the collaboration and coordination of at least one SST member and OEC Urban Support member, the district will receive professional development and targeted technical assistance in securing informed parental consent for all evaluations.</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-5	<p>34 CFR 300.304(c)(4) [Other evaluation procedures] OAC 3301-51-01 [Applicability of requirements and definitions] and 3301-51-06 (E)(2)(a) [Evaluation procedures]</p> <p>Fifty-two (52) out of 52 applicable evaluations reviewed, or 100%, did not provide evidence that the evaluation addresses all areas related to the suspected disability.</p> <p><u>Interviews</u></p> <p>Staff requested professional development/technical assistance as they are required to complete their assigned Part 1s.</p> <p><u>Concerns Noted</u></p> <p>Several records did not indicate observation and/or observation was indicated as “additional testing/data needed” but date, time and location of the observation were missing.</p> <p>Observations are required for all initial and reevaluations. The district must ensure that the child is observed in the child’s learning environment (including the general education classroom setting) to document the child’s academic performance and behavior in the area of difficulty (300.310).</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.</p> <p>Toledo Public School District must develop an internal monitoring process which contains procedures to ensure:</p> <ul style="list-style-type: none"> • Active team participation in the ETR planning process; • Appropriate evaluation data is available; and • Assessments identified on the Planning Form are being completed and represented in a Part 1. <p>The Department will verify 100% compliance in this area through a review of new records that have been written after all trainings have been completed.</p> <p>Toledo Public School District must develop an internal monitoring process to ensure that the evaluation addressed all areas related to the suspected disability.</p> <p>With the collaboration and coordination of at least one SST member and OEC Urban Support member, the district will receive professional development and targeted technical assistance to refine the ETR planning process and individual evaluator’s (Part 1s) input process.</p> <p><u>Opportunities for Improvement</u></p> <p>The district should consider using the assessment title from the Planning Form when completing Part 1.</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>Forty-one (41) out of 52 applicable evaluations reviewed, or 79%, did not show evidence of clearly stating the summary of assessment results.</p> <p><u>Interviews</u></p> <p>Staff indicated a need for professional development/technical assistance in completing the Part 1s with all the required elements.</p> <p><u>Concerns Noted</u></p> <p>The information from Part 1s was not summarized in a clear and concise manner in Part 2. In some instances, the information was entirely omitted without explanation. Information in Part 1 must be brought forward in the Part 2 with a clear and concise summary which is clearly understood by the parent, and used to develop an actionable IEP that is an educational benefit to the student.</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.</p> <p>Toledo Public School District must develop an internal practice that will monitor the completion of the Part 2 Team Summary of the Evaluation Team Report (ETR) to ensure that all areas assessed in a Part 1 Individual Evaluator's Assessment are summarized in the Part 2.</p> <p>The Department will verify 100% compliance in this area through a review of new records that have been written after all trainings have been completed.</p> <p>With the collaboration and coordination of at least one SST member and OEC Urban Support member, the district will receive professional development and targeted technical assistance in developing a clear and concise summary of all assessment results.</p>	<p><input checked="" type="checkbox"/> Yes</p> <p>This finding needs to be addressed in a Corrective Action Plan.</p>
CF-7	<p>34 CFR 300.306(c) [Procedures for determining eligibility and educational need]</p> <p>Thirty-one (31) out of 52 applicable evaluation team reports reviewed, or 60%, did not contain a clear and succinct description of educational needs.</p> <p><u>Interviews</u></p> <p>Staff indicated a need for professional development/technical assistance in completing the Part 1s with all the required elements.</p> <p><u>Concerns Noted</u></p> <p>Most ETRs did not include all the needs identified in Part 1s, or educational needs described in Part 1s were omitted in Part 2 without explanation and/or were not summarized in Part 2.</p>	<p><u>Individual Correction</u></p> <p>The educational agency will reconvene the ETR teams to conduct a reevaluation and provide a clear and succinct description of the student's educational needs. The IEP team must consider the results of this reevaluation.</p> <p><u>Systemic Correction</u></p> <p>The educational agency must submit evidence to the Department of written procedures and practices regarding description of educational needs.</p> <p>Toledo Public School District must develop an internal monitoring process that will ensure the Part 2 Team Summary of the Evaluation Team Report contains a clear</p>	<p><input checked="" type="checkbox"/> Yes</p> <p>This finding needs to be addressed in a Corrective Action Plan.</p>

Record Review Item	Evidence of Findings	Evidence of Corrections/Recommendations	Must be Addressed in CAP
		<p>and concise description of educational needs from all Part 1s.</p> <p>The Department will verify 100% compliance in this area through a review of new records that have been written after all trainings have been completed.</p> <p>With the collaboration and coordination of at least one SST member and OEC Urban Support member, the district will receive professional development and targeted technical assistance in developing a clear and concise description of educational needs.</p> <p><u>Opportunities for Improvement</u></p> <p>There is an opportunity for professional development and targeted technical assistance in developing a clear and concise description of educational needs.</p>	
CF-8	<p><i>34 CFR 300.306(c) [Procedures for determining eligibility and educational need]</i></p> <p>Twenty-one (21) out of 52 applicable evaluation team reports reviewed, or 40%, did not contain specific implications for instruction.</p> <p><u>Interviews</u></p> <p>Staff indicated a need for professional development/technical assistance in completing the Part 1s with all the required elements.</p> <p><u>Concerns Noted</u></p> <p>Some ETRs did not include all specific implications for instruction identified in Part 1s and/or were omitted in Part 2 without explanation and/or were not summarized in Part 2.</p>	<p><u>Individual Correction</u></p> <p>The educational agency will reconvene the ETR teams to conduct a reevaluation and provide a clear description of specific implications for instruction. The IEP team must consider the results of this reevaluation.</p> <p><u>Systemic Correction</u></p> <p>The educational agency must submit evidence to the Department of written procedures and practices regarding implications for instruction.</p> <p>Toledo Public School District must develop an internal monitoring process that will ensure the Part 2 Team Summary of the Evaluation Team Report contains specific implications for instruction from all Part 1s.</p> <p>The Department will verify 100% compliance in this area through a review of new records that have been written after all trainings have been completed.</p> <p>With the collaboration and coordination of at least one SST member and OEC Urban Support member, the district will receive professional development and targeted technical assistance in developing a clear and concise specific implication for instruction.</p>	<p><input checked="" type="checkbox"/> Yes</p> <p>This finding needs to be addressed in a Corrective Action Plan.</p>

Record Review Item	Evidence of Findings	Evidence of Corrections/Recommendations	Must be Addressed in CAP
CF-9	<p>34 CFR 300.306(a)(1) [Determination of eligibility] OAC 3301-51-01 (B)(21) [Applicability of requirements and definitions]</p> <p>Twenty-nine (29) out of 52 applicable evaluations reviewed, or 56%, 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>Interviews</u></p> <p>Several staff members indicated they were not actively involved in some of the ETR meetings and that they had little say in the assessment’s outcomes for their students. General education teachers were sometimes absent during the ETR meetings.</p> <p><u>Concerns Noted</u></p> <p>Review of records indicated that all required team members were often not present at the ETR meetings.</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 the Department with evidence of group participation.</p> <p><u>Systemic Correction</u></p> <p>The educational agency must submit evidence to the Department of written procedures and practices regarding the eligibility determination process to include all required team members.</p> <p>The Department will verify 100% compliance in this area through a review of new records that have been written after all trainings have been completed.</p> <p>Toledo Public School District must develop an internal monitoring process to ensure 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 the child’s educational needs.</p> <p>With the collaboration and coordination of at least one SST member and OEC Urban Support member, the district will receive professional development and targeted technical assistance to ensuring that a group of qualified professionals, as appropriate to the suspected disability(s), were involved in determining whether the child is a child with a disability as well as the child’s educational needs.</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-10	<p><i>OAC 3301-51-01 (B)(10) [Definitions] and 3301-51-06 [Evaluations]</i></p> <p>Thirty-five (35) out of 52 applicable evaluations reviewed, or 67%, did not provide a justification for the eligibility determination decision.</p> <p><u>Interviews</u></p> <p>During interviews, the staff indicated they would like additional training to understand how to write a comprehensive eligibility justification statement.</p> <p><u>Concerns Noted</u></p> <p>During the record review process, it was noted that the justification often did not include how the student’s disability affects the child’s access to and progress in the general education curriculum.</p> <p>Several records did not provide an explanation of how the student did not meet the eligibility for the suspected disability category(s).</p> <p>Several records did not complete Part 3, when the suspected disability category was Specific Learning Disability (SLD).</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>The educational agency must submit evidence to the Department of written procedures and practices regarding the eligibility determination decision. The Department will verify 100% compliance in this area through a review of new records that have been written after all trainings have been completed.</p> <p>Toledo Public School District must develop an internal monitoring process to ensure that a compliant justification for the eligibility determination decision was developed.</p> <p>With the collaboration and coordination of at least one SST member and OEC Urban Support member, the district will receive professional development and targeted technical assistance in developing a compliant justification statement for the disability determination based on how the disability affects the child’s access to and progress in the general education curriculum.</p>	<p><input checked="" type="checkbox"/> Yes</p> <p>This finding needs 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
DS-1	<p>SPP Indicator 13 34 CFR 300.320(b) [Transition services] OAC 3301-51-07 (H)(2) [Definition of individualized education program]</p> <p>Nineteen (19) out of 19 applicable IEPs reviewed, or 100%, did not show evidence that the postsecondary transition plan met all eight required elements of the IDEA for the student:</p> <ol style="list-style-type: none"> 1. There are appropriate measurable postsecondary goal(s). 2. The postsecondary goals are updated annually. 3. The postsecondary goals were based on age-appropriate transition assessment (AATA). 4. There are transition services that will reasonably enable the student to meet the postsecondary goal(s). 5. The transition services include courses of study that will reasonably enable the student to meet the postsecondary goal(s). 6. The annual goal(s) are related to the student's transition service needs. 7. There is evidence the student was invited to the IEP Team Meeting where transition services were discussed. 8. When appropriate, there is evidence that a representative of any participating agency was invited to the IEP Team Meeting. <p>Interviews During interviews, the staff indicated they would like additional training in selecting a comprehensive age-appropriate-transition-assessment (AATA).</p> <p>Concerns Noted Several records did not provide a clear description of the student's preferences, interests, needs, and strengths (PINS). Several records failed to identify who will provide the transition services and in some cases the transition services were the same as the previous IEP, therefore questioning if the transition services were provided.</p>	<p>Individual Correction The educational agency must reconvene the teams to review and correct the postsecondary transition plan for the IEPs identified as noncompliant.</p> <p>Systemic Correction The educational agency must submit evidence to the Department of written procedures and practices regarding transition services. Toledo Public School District must develop an internal monitoring process that will ensure that transition plans in the current IEP meet all eight required elements for IDEA through the use of the indicator 13 Checklist. The Department will verify 100% compliance in this area through a review of new records that have been written after all trainings have been completed. With the collaboration and coordination of at least one SST member and OEC Urban Support member, the district will receive professional development and targeted technical assistance in developing a compliant postsecondary transition plan that meets all eight required elements of the IDEA for the student based on individual strengths and needs.</p>	<p><input checked="" type="checkbox"/> Yes This finding needs to be addressed in a Corrective Action Plan.</p>

Record Review Item	Evidence of Findings	Evidence of Correction/Recommendations	Must be Addressed in CAP
DS-2	<p>34 CFR 300.320(a)(1) [Definition of individualized education program]</p> <p>Forty-six (46) out of 54 IEPs reviewed, or 85%, 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>Based on the interview sessions, there is a lack of understanding among staff members regarding the required contents of the present levels of performance to develop an annual measurable goal(s).</p> <p><u>Concerns Noted</u></p> <p>Record reviews indicated that present levels of performance often lacked clear current baseline that is directly related to the development of the annual measurable goals. Also, in many cases the present levels of performance were missing the required comparison to grade-level or age-appropriate performance expectations.</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 trainings have been completed.</p> <p>Toledo Public School District must develop an internal monitoring process to ensure that a present levels of academic achievement and functional performance (PLOP) are compliant that addressed the needs of the student.</p> <p>With the collaboration and coordination of at least one SST member and OEC Urban Support member, the district will receive professional development and targeted technical assistance in developing present levels of academic achievement and functional performance that clearly address the needs of the student, as well as it relates to the development of the annual measurable goal.</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>Thirty-four (34) out of 54 IEPs reviewed, or 63%, did not contain measurable annual goals.</p> <p>Interviews</p> <p>Based on the interview sessions, there is a lack of understanding among staff members regarding the required contents to develop a measurable annual goal.</p> <p>Concerns Noted</p> <p>In most cases, the measurable annual goals did not contain all the required elements or were worded in an unclear manner with too many measurements or skills in one goal.</p> <p>At times the measurable annual goals lacked clarity of the defined behavior(s) and of the specific measurements for achievement and mastery of the goals.</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. <u>Clearly 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 trainings have been completed.</p> <p>Toledo Public School District must develop an internal monitoring process to ensure compliant measurable annual goal.</p> <p>With the collaboration and coordination of at least one SST member and OEC Urban Support member, the district will receive professional development and targeted technical assistance in writing compliant measurable annual goals.</p>	<p><input checked="" type="checkbox"/> Yes</p> <p>This finding needs to be addressed in a Corrective Action Plan.</p>
DS-4	<p>34 CFR 300.320(a)(2)(i) [Definition of individualized education program]</p> <p>Twelve (12) out of 52 applicable IEPs reviewed, or 23%, did not contain annual goals that address the child’s academic area(s) of need.</p>	<p>Individual Correction</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>Systemic Correction</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 trainings have been completed.</p>	<p><input checked="" type="checkbox"/> No</p> <p>This finding does <u>not</u> need to be addressed in a Corrective Action Plan.</p>

Record Review Item	Evidence of Findings	Evidence of Correction/Recommendations	Must be Addressed in CAP
		<p><u>Opportunities for Improvement</u> Toledo Public School District should develop an internal monitoring process that will ensure that all academic needs are addressed in the current IEP.</p> <p>There is an opportunity for professional development and targeted technical assistance to ensure that all academic needs are addressed within the child's IEP.</p>	
DS-5	<p><i>34 CFR 300.320(a)(2)(i) [Definition of individualized education]</i></p> <p>Ten (10) out of 43 applicable IEPs reviewed, or 23%, did not contain annual goals that address the child's functional area(s) of need.</p>	<p><u>Individual Correction</u> The educational agency must reconvene the teams of the IEPs identified as noncompliant to review and amend the IEP. Annual goals must address the functional needs of the child unless the team provides evidence that the goals were prioritized based on the severity of the needs of the child.</p> <p><u>Systemic Correction</u> It is recommended that the educational agency review and revise its written procedures and practices regarding the IEP process of addressing identified functional needs. The Department will verify 100% compliance in this area through a review of new records that have been written after all trainings have been completed.</p> <p><u>Opportunities for Improvement</u> There is an opportunity for professional development and targeted technical assistance to ensure that all functional needs are addressed within the child's IEP.</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>Forty-four (44) out of 54 IEPs reviewed, or 81%, did not contain a statement of specially designed instruction including related services that address the individual needs of the child and support the annual goals.</p> <p><u>Interviews</u></p> <p>Based on the interview sessions, there is a lack of understanding among staff members regarding the required contents to develop a statement of specially designed instruction including related services that address the individual needs of the child and support the annual goals.</p> <p><u>Concerns Noted</u></p> <p>Several records were missing the type of instruction (whole group, one-on-one, or small group). In many cases, there was a list of accommodations listed in this section, describing the nature of the instruction (clarity instruction versus accommodations provided).</p>	<p><u>Individual Correction</u></p> <p>The educational agency must reconvene the teams of the IEPs identified as noncompliant to review and amend the specially designed instruction, as appropriate, to address the needs of the child.</p> <p><u>Systemic Correction</u></p> <p>The educational agency must submit evidence to the Department of written procedures and practices regarding the IEP process of determining specially designed instruction.</p> <p>Toledo Public School District must develop an internal monitoring process that will ensure that the IEP specifically identifies the provision of specially designed instruction (SDI) and related services AND describes the nature of the instruction that aligns with the needs of the child AND supports achievement of annual goals. The SDI describes skills and methods used for instruction specific to the goal; OR The child is receiving related services that the IEP team has determined is specially designed instruction.</p> <p>The Department will verify 100% compliance in this area through a review of new records that have been written after all trainings have been completed.</p> <p>With the collaboration and coordination of at least one SST member and OEC Urban Support member, the district will receive professional development and targeted technical assistance in developing a statement of specially designed instruction (SDI) including related services that address the individual needs of the child and support the annual goals.</p>	<p><input checked="" type="checkbox"/> Yes</p> <p>This finding needs to be addressed in a Corrective Action Plan.</p>

Record Review Item	Evidence of Findings	Evidence of Correction/Recommendations	Must be Addressed in CAP
DS-7	<p>34 CFR 300.320(a)(7) [Definition of individualized education program] OAC 3301-51-07 (H)(1)(i) [Definition of IEP]</p> <p>Seven out of 54 IEPs reviewed, or 13%, 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 trainings have been completed.</p> <p><u>Opportunities for Improvement</u> There is an opportunity for professional development and targeted technical assistance to ensure clarity to indicate the specific location where the specially designed instruction (SDI) will be provided.</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>Six out of 54 IEPs reviewed, or 11%, did not indicate the amount of time and frequency of the specially designed instruction.</p>	<p><u>Individual Correction</u> The educational agency must reconvene the teams of the IEPs identified as noncompliant to review and amend the amount of time and frequency of the specially designed instruction.</p> <p><u>Systemic Correction</u> It is recommended that the educational agency review and revise its written procedures and practices regarding the IEP process of determining the amount and frequency of specially designed instruction to be provided. The Department will verify 100% compliance in this area through a review of new records that have been written after all trainings have been completed.</p> <p>Tracking of Specially Designed Instruction (SDI) delivery was a noted concern through the interview sessions and the IEP verifications. The district must develop and implement an SDI tracking system across the district to ensure Free Appropriate Public Education [OAC 3301-51-07(K)].</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
		<p><u>Opportunities for Improvement</u> There is an opportunity for professional development and targeted technical assistance to indicate the amount of time and frequency of the specially designed instruction (SDI).</p>	
DS-9	<p>34 CFR 300.324(a)(2)(v) [Development of IEP] OAC 3301-51-01(B)(3) [Applicability of requirements and definitions] Two out of eight applicable IEPs reviewed, or 25%, did not identify assistive technology to enable the child to be involved and make progress in the general education curriculum.</p>	<p><u>Individual Correction</u> The educational agency must reconvene the teams of the IEPs identified as noncompliant to review 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> 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 trainings have been completed.</p> <p><u>Opportunities for Improvement</u> There is an opportunity for professional development and targeted technical assistance to identify assistive technology to enable the child to be involved and make progress in the general education curriculum.</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] Forty-two (42) out of 48 applicable IEPs reviewed, or 88%, did not identify accommodations provided to enable the child to be involved and make progress in the general education curriculum.</p> <p><u>Interviews</u> Staff has requested professional development/technical assistance in identifying and writing clear accommodations that would benefit the needs of the student.</p> <p><u>Concerns Noted</u> Several records documented accommodations “as needed,” “as requested” or “at the discretion of the teacher”. If accommodation is listed, it must be provided as written. The conditions and/or extent were not clearly explained (when and where are services provided).</p>	<p><u>Individual Correction</u> The educational agency must reconvene the teams of the IEPs identified as noncompliant to review the accommodations that would directly assist the child to access the course content without altering the scope or complexity of the information taught and include them on the IEP.</p> <p><u>Systemic Correction</u> The educational agency must submit evidence to the Department of written procedures and practices regarding accommodations. Toledo Public School District must develop an internal monitoring process that will ensure that current IEPs contain appropriate and clear accommodations which will allow the child to be involved and make progress in the general education curriculum.</p>	<p><input checked="" type="checkbox"/> Yes This finding needs to be addressed in a Corrective Action Plan.</p>

Record Review Item	Evidence of Findings	Evidence of Correction/Recommendations	Must be Addressed in CAP
		<p>The Department will verify 100% compliance in this area through a review of new records that have been written after all trainings have been completed.</p> <p>With the collaboration and coordination of at least one SST member and OEC Urban Support member, the district will receive professional development and targeted technical assistance to identify individualized accommodations that will enable the child to be involved and make progress in the general education curriculum.</p>	
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>Fourteen (14) out of 21 applicable IEPs reviewed, or 67%, did not identify modifications to enable the child to be involved and make progress in the general education curriculum.</p> <p>Interviews</p> <p>Staff has requested professional development/technical assistance in identifying modifications to enable the child to be involved and make progress in the general education curriculum.</p> <p>Concerns Noted</p> <p>Several records failed to define the extent of the modification(s) regarding content and instructional level(s). For example, “modified assignments/lower grade level as needed” would question to what extent are the assignments modified. And modifications cannot be stated “as needed.”</p>	<p>Individual Correction</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>Systemic Correction</p> <p>The educational agency must submit evidence to the Department of written procedures and practices regarding modifications.</p> <p>Toledo Public School District must develop an internal monitoring process that will ensure that the current IEP contains clear description of the modification(s) that will enable the child to be involved and make progress in the general education curriculum.</p> <p>The Department will verify 100% compliance in this area through a review of new records that have been written after all trainings have been completed.</p> <p>With the collaboration and coordination of at least one SST member and OEC Urban Support member, the district will receive professional development and targeted technical assistance to identify individualized modifications that will enable the child to be involved and make progress in the general education curriculum.</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-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>Three out of eight applicable IEPs reviewed, or 38%, did not identify supports for school personnel to enable the child to be involved and make progress in the general education curriculum.</p> <p><u>Interviews</u></p> <p>Staff have requested professional development/technical assistance in this area.</p> <p><u>Concerns Noted</u></p> <p>Several records were documented to explain what services were being provided to the child from an adult. Supports for School Personnel needs to describe what support adult staff are receiving from other adult staff to assist in the implementation 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 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 the Department of written procedures and practices regarding supports for school personnel.</p> <p>Toledo Public School District must develop an internal monitoring process that will ensure that the current IEP describes support(s) to school personnel who may need assistance in implementing the child's IEP. This section describes what support adult staff receive from other adult staff. For each support, the team must list the school personnel to receive the support, the specific support that will be provided and who will provide the support.</p> <p>The Department will verify 100% compliance in this area through a review of new records that have been written after all trainings have been completed.</p> <p>With the collaboration and coordination of at least one SST member and OEC Urban Support member, the district will receive professional development and targeted technical assistance to identify supports for school personnel to enable the child to be involved and make progress in the general education curriculum.</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-13	<p><i>OAC 3301-51-07 (H)(1)(h)(ii) [Definition of IEP]</i></p> <p>One out of three applicable student records reviewed, or 33%, did not have a justification statement explaining why the student cannot participate in the regular assessment and why the alternate assessment is appropriate for the student.</p> <p><u>Interviews</u></p> <p>Staff have requested professional development/technical assistance in this area.</p> <p><u>Concerns Noted</u></p> <p>The record did not contain a clear description and documentation.</p>	<p><u>Individual Correction</u></p> <p>The educational agency must reconvene the teams of the IEPs 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 the Department of written procedures and practices regarding the determination of participation in the AASCD.</p> <p>Toledo Public School District must develop an internal monitoring process that will ensure that the current IEP contains a description of why the child cannot participate in the regular assessment and why the alternate assessment is appropriate for the student AND evidence that the IEP team used the required Alternate Assessment for Students with Significant Cognitive Disabilities (AASCD) Decision-Making Tool documenting evidence of significant cognitive disability.</p> <p>The Department will verify 100% compliance in this area through a review of new records that have been written after all trainings have been completed.</p> <p>With the collaboration and coordination of at least one SST member and OEC Urban Support member, the district will receive professional development and targeted technical assistance in developing 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><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-14	<p><i>OAC 3301-51-07(L)(2) [Development, review and revision of IEP]</i></p> <p>Thirty-five (35) out of 50 applicable student records reviewed, or 70%, did not show evidence of progress reporting data collected and analyzed to monitor performance on each goal.</p> <p><u>Interviews</u></p> <p>Staff have requested professional development/technical assistance in collecting qualitative and quantitative data which can be used to inform future instruction.</p> <p><u>Concerns Noted</u></p> <p>Several records did not contain progress on the annual goal(s) itself which was missing qualitative and quantitative data relating to the mastery level(s) of the goal(s). These records also contained vague phrases such as “minimal progress” or “adequate progress” without explaining in such a way that this information can be used to inform future instruction.</p>	<p><u>Individual Correction</u></p> <p>None</p> <p><u>Systemic Correction</u></p> <p>The educational agency must submit evidence to the Department of written procedures and practices regarding measurable annual goals and services consistent with progress made.</p> <p>Toledo Public School District must develop an internal monitoring process that will ensure that the current IEP contains instructional data collected for each measurable annual goal AND there is evidence that the progress data reported align to measurement(s) used in the annual goal statement.</p> <p>The Department will verify 100% compliance in this area through a review of new records that have been written after all trainings have been completed.</p> <p>Toledo Public School District must develop and implement a formal process of tracking and analyzing the progress of measurable annual goals. Progress on goals should be reported in alignment with the measurement used in the annual goal statement to ensure Free Appropriate Public Education [OAC 3301-51-07 (K)].</p> <p>With the collaboration and coordination of at least one SST member and OEC Urban Support member, the district will receive professional development and targeted technical assistance in developing a process of progress reporting data collection and analysis to monitor performance on each goal.</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-15	<p><i>OAC 3301-51-07(L) [Development, review and revision of IEP]</i></p> <p>Six out of seven applicable IEPs reviewed, or 86%, did not show evidence that revisions were made based on data indicating changes in student needs or abilities.</p> <p><u>Interviews</u></p> <p>The staff were aware that they could revise the IEP based on data indicating changes in student needs or abilities.</p> <p><u>Concerns Noted</u></p> <p>The records indicated that the current IEP was not revised based on the current data indicating changes in student needs and abilities. Please see the specific language in each student record comment sheet.</p>	<p><u>Individual Correction</u></p> <p>The educational agency must reconvene the teams to review and amend the IEPs to reflect changes made based on current needs or abilities.</p> <p><u>Systemic Correction</u></p> <p>The educational agency must submit evidence to the Department of written procedures and practices regarding using data to revise IEPs based on changes in student needs or abilities.</p> <p>Toledo Public School District must develop an internal monitoring process that will ensure data from progress monitoring and/or recent evaluations drive decisions made to revise the IEP.</p> <p>The Department will verify 100% compliance in this area through a review of new records that have been written after all trainings have been completed.</p> <p>With the collaboration and coordination of at least one SST member and OEC Urban Support member, the district will receive professional development and targeted technical assistance in developing a process that revisions were made based on data indicating changes in student needs and/or abilities.</p>	<p><input checked="" type="checkbox"/> Yes</p> <p>This finding needs to be addressed in a Corrective Action Plan.</p>
DS-16	<p><i>34 CFR 300.321(5) [IEP team]</i></p> <p><i>OAC 3301-51-07(I) [IEP team]</i></p> <p>Nineteen (19) out of 54 IEPs reviewed, or 35%, did not indicate that the IEP Team included a group of qualified professionals.</p> <p><u>Interviews</u></p> <p>Some staff were frustrated that they were not provided with ample time/notice when the IEP meeting would occur.</p> <p><u>Concerns Noted</u></p> <p>Several records did not contain the signatures of the required qualified IEP team. Please see the specific language in each student record comment sheet.</p>	<p><u>Individual Correction</u></p> <p>For the IEPs identified as noncompliant, the educational agency must</p> <ul style="list-style-type: none"> • Provide evidence that the IEP team, including the parent, participated in the IEP meeting; or • Provide evidence that the educational agency made reasonable attempts to include the parent in the IEP meeting; and/or • Provide documentation that the parent and the educational agency consent, in writing, to excuse the required member prior to the IEP meeting; or • Reconvene the IEP team to review the IEP with all required members present. 	<p><input checked="" type="checkbox"/> Yes</p> <p>This finding needs to be addressed in a Corrective Action Plan.</p>

Record Review Item	Evidence of Findings	Evidence of Correction/Recommendations	Must be Addressed in CAP
		<p><u>Systemic Correction</u></p> <p>The educational agency must submit evidence to the Department of written procedures and practices regarding the involvement of all required team members, including the parent, in IEP meetings.</p> <p>Toledo Public School District must develop an internal monitoring process that will ensure the IEP Team includes a group of qualified professionals.</p> <p>The Department will verify 100% compliance in this area through a review of new records that have been written after all trainings have been completed.</p> <p>With the collaboration and coordination of at least one SST member and OEC Urban Support member, the district will receive professional development and targeted technical assistance to ensure that the IEP Team included a group of qualified professionals.</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>Forty-one (41) out of 54 IEPs reviewed, or 76% did not include an explanation of the extent to which the child will not participate with nondisabled children in the general education classroom.</p> <p>Interviews</p> <p>In several interviews, staff shared that it was not a “team” decision when determining the child’s LRE. Also, staffing issues (lack of paraprofessionals or intervention specialists) were a consideration when determining the child’s LRE.</p> <p>Concerns Noted</p> <p>Several records failed to reflect consideration for provision of supplementary aids and services in the general education classroom. The justification as to why the student cannot be served in the general education classroom was not provided, just a description of the LRE was provided.</p> <p>Some justification statements describe the LRE but did not provide an explanation of the extent to which the child will not participate with nondisabled children in the general education curriculum.</p> <p>The LRE justification should not be based on the child’s disability category.</p> <p>In other records, the LRE statement does not align with the SDI location (for example, the SDI location was identified as the general education classroom for all academic annual goals, but the justification describes a self-contained classroom).</p>	<p>Individual Correction</p> <p>The educational agency must reconvene the teams of the IEPs identified as noncompliant to review and include a justification as to why the child was removed from the general education classroom. The justification should:</p> <ul style="list-style-type: none"> • Be based on the needs of the child, not the disability. • Reflect that the team has given adequate consideration to meeting the student’s needs in the general classroom with supplementary aids and services. • Document that the nature or severity of the disability is such that education in general education classes, even with the use of supplementary aids and services, cannot be achieved satisfactorily. • Describe potential harmful effects to the child or others, if applicable. <p>Systemic Correction</p> <p>The educational agency must submit evidence to the Department of written procedures and practices regarding the least restrictive environment placement decision process.</p> <p>Toledo Public School District must develop an internal monitoring process that will ensure that the child’s LRE is based on an IEP team decision.</p> <p>The Department will verify 100% compliance in this area through a review of new records that have been written after all trainings have been completed.</p> <p>With the collaboration and coordination of at least one SST member and OEC Urban Support member, the district will receive professional development and targeted technical assistance in developing a clear and concise explanation of the extent to which the child will not participate with nondisabled children in the general education classroom AND reflection that the team has given adequate consideration to meeting the student’s needs in the general education classroom with supplementary aids and services.</p>	<p><input checked="" type="checkbox"/> Yes</p> <p>This finding needs to be addressed in a Corrective Action Plan.</p>