

Trimble Local School District IRN: 045922
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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 Trimble Local School District 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 January 14-15, 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

Trimble Local School District mailed 155 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 January 14, 2020, OEC consultants held a public meeting for parents and other interested parties. No parents or family members attended the public meeting. One State Support Team (SST) Region 16 representative attended. Attendees could speak to OEC representatives publicly in the meeting, speak to OEC representatives individually, provide written comments or both. There were no comments made during the public meeting. Written comment forms were available before, during and after the meeting. OEC did not receive any 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 17 records of students with disabilities. OEC selected records of students with disabilities from a variety of disability categories and ages. Eleven (11) student records were selected for IEP verification in the classroom setting. OEC conducted 11 IEP verifications and some areas of concern were found regarding the implementation of the IEP within various classroom settings. Refer to the IEP verification reports for individual reviewer comments and/or concerns.

4. Staff/Administrative Interviews

On January 14, 2020, OEC consultants held 10 sessions of interviews with 6 administrators and 39 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 Raymond.mccain@education.ohio.gov 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 13, 2021

OEC Trainings

As part of the OEC monitoring process, Trimble 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: November 14, 2020

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 2, 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 23, 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: Raymond McCain, OEC Contact Consultant, at 614-593-5477, toll-free at (877) 644-6338, or by e-mail at 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>Seven 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>Interviews revealed that the intervention process/Response to Intervention (RTI) process is building specific. It would benefit the district to explore which buildings are most successful in handling the intervention/RTI process and consider adopting those best practices on a district-wide level.</p> <p>Some respondents described a lack of understanding regarding interventions and the need to document what has been attempted. This is an opportunity for professional development and targeted technical assistance regarding intervention and subsequent documentation.</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 evaluation and reevaluation team report.</p>	<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	
		<p><u>Other Considerations</u></p> <p>It is recommended that Trimble Local Schools develop a procedure of checks and balances to ensure interventions that are being provided to students are correctly documented within the ETR as well as in Part 2s, Summary of Interventions.</p> <p>Trimble Local Schools would benefit from creating a district wide RTI process that would be implemented throughout all three buildings. All members of Trimble Local Schools need to be trained on the correct implementation of this RTI process, along with monitoring from administration to provide any additional technical assistance needed.</p>		
CF-3	300.501(b)(1) 3301-51-06 (E)(2)(a)	<p><u>Record Review</u></p> <p>Two student records did not show evidence that the parent was afforded the opportunity to participate in the evaluation team planning meeting.</p>	<p><u>Individual Correction</u></p> <p>The educational agency must provide evidence that the parent was involved or provided the opportunity to participate in the evaluation planning process.</p> <p>The evidence may include evaluation planning form, prior written notice, parent invitation, referral form or communication log.</p> <p>If the educational agency cannot provide documentation that the parent was involved or provided the opportunity to participate in the evaluation planning process, the educational agency must conduct a reevaluation planning meeting with the parent.</p> <p><u>Systemic Correction</u></p> <p>The educational agency must submit evidence to OEC of written procedures and practices that include the parent in the evaluation planning process.</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-4	300.300	<p><u>Record Review</u></p> <p>Two student records did not provide evidence of parental consent obtained prior to new testing.</p>	<p><u>Individual Correction</u></p> <p>The educational agency must provide evidence that the parent provided informed, written consent for evaluation, based upon the planning form. Or the agency must show documented repeated attempts to obtain informed, written consent to which the parent did not respond.</p> <p>The evidence may include, prior written notice, parent invitation, communication log, or other documented attempts to obtain parental informed, written consent.</p> <p>If the educational agency cannot provide documentation that the parent provided informed, written consent for evaluation, or did not respond to repeated attempts to obtain consent, the agency must conduct a reevaluation including documentation of parental consent.</p> <p><u>Systemic Correction</u></p> <p>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.</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	
CF-5	300.304(c)(4) 3301-51-01 3301-51-06 (E)(2)(a)	<p><u>Record Review</u></p> <p>Sixteen (16) evaluations did not provide evidence that the evaluation addresses all areas related to the suspected disability.</p> <p><u>Interviews</u></p> <p>It was discussed during the interview sessions that all teachers would benefit from attending some training focusing on how to compliantly complete any part 1 assigned to them.</p> <p>Respondents also described the difficulty they were having obtaining a completed Part 1, in any format, from those who were assigned to complete a Part 1.</p> <p><u>Other Considerations</u></p> <p>Trimble Local Schools 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>In several cases, assessments included on the planning form were not presented in Part 1 of the ETR, and, in other cases, assessments were reported in Part 1 that were not included on the planning form. All assessments and data listed for evaluation on the ETR planning form, and agreed upon by the parent, must appear – in some form – in a Part 1 individual evaluator’s assessment.</p>	<p><u>Individual Correction</u></p> <p>The educational agency will convene the ETR teams to conduct a reevaluation and provide evidence that the evaluation addresses all areas related to the suspected disability.</p> <p><u>Systemic Correction</u></p> <p>The educational agency must submit evidence to OEC of written procedures and practices to provide evidence that the evaluation addresses all areas related to the suspected disability.</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	
CF-6	300.306(c)	<p><u>Record Review</u></p> <p>Eight evaluations did not show evidence of clearly stating the summary of assessment results.</p> <p><u>Other Considerations</u></p> <p>The information from Part 1 was not summarized in a clear and concise manner in Part 2. In some instances, the information was entirely omitted. Information in Part 1s must be brought forward to Part 2 in a manner that can be clearly understood by the parent and used by the IEP team to develop meaningful goals and services.</p>	<p><u>Individual Correction</u></p> <p>The educational agency will reconvene the ETR teams to conduct a reevaluation and provide a clear and concise summary of the data and assessment conducted that meets the requirements of 3301-51-06 (G) (Summary of information). The IEP team must consider the results of this reevaluation.</p> <p><u>Systemic Correction</u></p> <p>The educational agency must submit evidence to OEC of written procedures and practices regarding summary of data and assessment results.</p>	<p><input checked="" type="checkbox"/> Yes</p> <p>The educational agency needs to address this finding in a Corrective Action Plan.</p>
CF-7	300.306(c)	<p><u>Record Review</u></p> <p>Two evaluation team reports did not contain a clear and succinct description of educational needs.</p>	<p><u>Individual Correction</u></p> <p>The educational agency will reconvene the ETR teams to conduct a reevaluation and provide a clear and succinct description of the student's educational needs. The IEP team must consider the results of this reevaluation.</p> <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"/> No</p> <p>The educational agency does <u>not</u> need to address this finding in a Corrective Action Plan.</p>
CF-8	300.306(c)	<p><u>Record Review</u></p> <p>One evaluation team report did not contain specific implications for instruction.</p>	<p><u>Individual Correction</u></p> <p>The educational agency will reconvene the ETR team 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"/> 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	
CF-9	300.306(a)(1) 3301-51-01 (B)(21)	<p><u>Record Review</u></p> <p>Ten (10) 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>Interview</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 assessments or outcomes for their students. General education teachers were sometimes absent during the planning meeting and/or ETR meeting due to lack of substitutes. Several general education teachers were "excused" from attending the ETR meeting resulting in a lack of a qualified team being in attendance, which is not permitted.</p> <p><u>Other Considerations</u></p> <p>It is recommended Trimble Local Schools develop a procedure of checks and balances to ensure all members of the planning/ETR team are in attendance for the entire length of these meetings. Training is also recommended to provide the district with the knowledge of legal responsibilities regarding the excusal of certain team members as well as who is required to attend these 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 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>	<input checked="" type="checkbox"/> Yes <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>Six 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>Interviews revealed a lack of understanding of the secondary transition process and responsibilities, indicating a need for training and technical assistance in this area.</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><u>Other Considerations</u></p> <p>In addition, transition services were often generic in nature and not developed to address individual student needs as identified in the AATA.</p> <p>Several Transition Plans did contain the student's Preferences, Interests, Needs and Strengths (PINS) that were gathered from appropriate AATAs. However, they appeared to be the same for all three postsecondary goals. There is an opportunity for Trimble Local Schools to improve their Transition Planning by better connecting student's PINS to student's Postsecondary Education, Competitive Employment and Independent Living Goals.</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.</p>		
DS-2	300.320(a)(1)	<p><u>Record Review</u></p> <p>Sixteen (16) 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>Several staff members indicated they use common assessment data in order to create a current baseline for the Present Levels of Performance. However, these data points are not specific to the deficits described in the goals.</p> <p>Responses to questions about present levels of performance indicated that the intervention specialists were not confident in developing goals.</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	
		<p><u>Other Considerations</u></p> <p>The present levels of performance in the IEPs reviewed were inconsistent in quality and content. Measurable baseline data were missing in many cases. Often, the present levels of performance did not relate to the annual goal. An internal monitoring and review system would be very helpful to promote compliance in present levels of performance.</p> <p>Additional training and or professional development needs to be provided to assist staff members on how to compliantly develop present levels of performance.</p>		
DS-3	300.320(a)(2)(i)	<p><u>Record Review</u></p> <p>Twelve (12) IEPs did not contain measurable annual goals.</p> <p><u>Interviews</u></p> <p>General education teachers would like to have more input in developing measurable annual goals for students within their classroom. With this in place, present levels of performance could be accurately obtained from staff when they are requested.</p> <p>Although most respondents indicated familiarity with the required elements for annual IEP goals, there is still a need for further training and technical assistance in this area.</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>

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
DS-4	300.320(a)(2)(i)	<p><u>Record Review</u></p> <p>Two IEPs did not contain annual goals that address the child's academic area(s) of need.</p>	<p><u>Individual Correction</u></p> <p>The educational agency must reconvene the teams of the IEPs identified as noncompliant to review and amend the IEP. Annual goals must address the academic needs of the child unless the team provides evidence that the goals were prioritized based on the severity of the needs of the child.</p> <p><u>Systemic Correction</u></p> <p>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>
DS-5	300.320(a)(2)(i)	<p><u>Record Review</u></p> <p>Three IEPs did not contain annual goals that address the child's functional area(s) of need.</p>	<p><u>Individual Correction</u></p> <p>The educational agency must reconvene the teams of the IEPs identified as noncompliant to review and amend the IEP. Annual goals must address the functional needs of the child unless the team provides evidence that the goals were prioritized based on the severity of the needs of the child.</p> <p><u>Systemic Correction</u></p> <p>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>Three 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>Other Considerations</u></p> <p>Even though Specially Designed Instruction did not meet the 30% threshold for a mandatory CAP component, several issues arose during the interview session, making this a topic of importance. With that statement, it is highly</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"/> 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	
		recommended Trimble Local Schools revisit and revise how Specially Designed Instruction is stated within the IEP, provided within the classroom and tracked throughout the day. With the development of procedures and training on Specially Designed Instruction, Trimble Local's IEPs will be better equipped for ensuring that Free and Appropriate Public Education is being delivered.		
DS-7	300.320(a)(7) 3301-51-07 (H)(1)(i)	<u>Record Review</u> Two IEPs did not indicate the specific location where the specially designed instruction will be provided.	<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. <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.	<input checked="" type="checkbox"/> No The educational agency does <u>not</u> need to address this finding in a Corrective Action Plan.
DS-8	300.320(a)(7) 3301-51-07 (H)(1)(i)	<u>Record Review</u> One IEP did not indicate the amount of time and frequency of the specially designed instruction.	<u>Individual Correction</u> The educational agency must reconvene the team of the IEP identified as noncompliant to review and amend the amount of time and frequency of the specially designed instruction. <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.	<input checked="" type="checkbox"/> No The educational agency does <u>not</u> need to address this finding in a Corrective Action Plan.
DS-9	300.320(a)(4) 3301-51-07 (H)(1)(e)	<u>Record Review</u> All IEPs identified related services that address the needs of the child and support the annual goals.	<u>Individual Correction</u> NA <u>Systemic Correction</u> NA	<input checked="" type="checkbox"/> NA

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)	<u>Record Review</u> All IEPs indicated the location where the related services will be provided.	<u>Individual Correction</u> NA <u>Systemic Correction</u> NA	<input checked="" type="checkbox"/> NA
DS-11	300.320(a)(7) 3301-51-07 (H)(1)(i)	<u>Record Review</u> All IEPs indicated the amount of time, duration and frequency of the related services to be provided.	<u>Individual Correction</u> NA <u>Systemic Correction</u> NA	<input checked="" type="checkbox"/> NA
DS-12	300.324(a)(2)(v) 3301-51-01(B)(3)	<u>Record Review</u> One IEP did not identify assistive technology to enable the child to be involved and make progress in the general education curriculum. <u>Other Consideration</u> Assistive technology must describe what will be provided to the student, for what purpose, under what conditions, how often and to what extent. An internal monitoring and review system would be very helpful to promote compliance in identifying Assistive Technology within Section 7 of the IEP.	<u>Individual Correction</u> The educational agency must reconvene the team of the IEP 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. <u>Systemic Correction</u> The educational agency must submit evidence to OEC of written procedures and practices regarding assistive technology.	<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	
DS-13	300.320(a)(6)(i) 3301-51-07 (H)(1)(g)	<p><u>Record Review</u></p> <p>Thirteen (13) IEPs did not identify accommodations provided to enable the child to be involved and make progress in the general education curriculum.</p> <p><u>Interview</u></p> <p>The need for and use of accommodations was misunderstood by some staff members, indicating a need for training and technical support in this area.</p> <p><u>Other Considerations</u></p> <p>An internal monitoring and review system would be very helpful to promote compliance when writing accommodations within 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 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>Two 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 and conditions for modifications must be explained. Refer to the current level of instruction, reading level or pace of instruction. Phrases like “as needed” are not acceptable in describing modifications.</p> <p>An internal monitoring and review system would be very helpful to promote compliance when writing modifications within 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 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>Two 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>Interview</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.</p> <p><u>Other Considerations</u></p> <p>A review of IEPs indicated a need for some specific procedures and training provided to all intervention specialists and related services regarding compliantly completing the Support for School Personnel section 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 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>All student records 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>NA</p> <p><u>Systemic Correction</u></p> <p>NA</p>	<input checked="" type="checkbox"/> NA
DS-17	3301-51-07(L)(2)	<p><u>Record Review</u></p> <p>Two IEPs did not contain measurable annual goals and services/placement consistent with progress made.</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"/> No <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-18	3301-51-07(L)	<p><u>Record Review</u></p> <p>Three IEPs did not show evidence that revisions were made based on data indicating changes in student needs or abilities.</p> <p><u>Other Consideration</u></p> <p>Through the review of records and progress reports, it appears Trimble Local School District's special education staff is not familiar with the IEP amendment process. Trimble Local Schools can address this issue by providing additional training through the State Support Team.</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>Two 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 <u>not</u> 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>Four 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 some difficulties with describing or implementing a true co-teaching model with co-planning that was consistent across all buildings.</p> <p>During interviews, there were inconsistencies reported regarding the understanding of LRE and a continuum of services.</p> <p>Several staff members interviewed stated their co-teaching classes contained more students with disabilities than general education students, making it very difficult for in-depth instruction to take place.</p> <p>Teachers stressed a major concern regarding the amount of “Study Skills” classes available throughout the day. Most of the time spent during these classes were more geared towards addressing students’ classroom assignments and testing, instead of allowing the intervention specialist to work on their Specially Designed Instruction. They also stated they would like to see “Study Skills” classes in every grade level because it is beneficial when implemented correctly and addresses individual student needs.</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>

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
		<p>Since there is not an Algebra 2 or Calculus Co-teaching class, the high school staff would like to see Integrated Math brought back into Trimble Local's curriculum.</p> <p><u>Other Considerations</u></p> <p>It is recommended that Trimble Local Schools review and revise their continuum of services provided to students with disabilities. Interview sessions discussed the lack of resource classrooms for those who are not progressing in the co-teaching classroom. Instead, those resource classroom placements were only allotted for students who were taking the alternate assessment.</p> <p>Training from the State Support Team and an internal monitoring review system would be very helpful to promote compliance in the areas of Least Restrictive Environment as well as improving their current continuum of services that will best suit each student's individual educational needs.</p>		

Commendations for Trimble Local Schools

- There appeared to be a good relationship between the general education teachers and intervention specialists regarding the co-teaching models Trimble Local School District has developed.
- Trimble Local School District staff are extremely passionate, caring and dedicated not only to students with disabilities, but the entire student body. This was evident through the interview process, IEP verifications and student/staff interactions.
- The district addressed the need for additional behavioral supports at the elementary level by creating a Behavior Support Room with an Intervention Specialist focusing on behavioral supports, which resulted in a decline of students being sent to the office and removed from class. Staff indicate these supports have been invaluable.
- Staff feel very supported by the Special Education Administration in the schools and have seen an improvement in this area throughout the past few years.
- Trimble local schools has a positive and supportive culture. Teachers shared they feel their relationships with their students are a strength for the district. They also feel teacher-to-teacher relationships are strong and supportive.

Opportunities for Improvement

- During the interview sessions, both intervention specialists and general education teachers expressed a need for professional development and support at the building level for a co-teaching model to be successful. They also voiced the need for common planning time.
- Trimble Local Schools would benefit from developing a new teacher onboarding process geared toward any new staff member hired regarding their Special Education Policies, Procedures and Practices.
- It is highly recommended that Trimble Local Schools revisit and revise their scheduling process/procedure for students, especially in the high school setting. Trimble Local Schools should assemble a team consisting of Administration, the Special Education Director as well as the School Psychologist and Guidance Counselor working together to draft, create and implement a schedule that works best for all Trimble Local students, instead of trying to fit students with disabilities into a schedule that is not conducive for meeting their individual needs. By implementing a cohesive schedule, Trimble Local Schools will be ensuring that students with disabilities receive a Free and Appropriate Public Education.
- Behavior was another issue mentioned in a lot of the interview sessions. Not having an official policy and procedure for disciplining all students attending Trimble Local Schools was causing staff members to be dissatisfied. Revisiting, revising, training as well as administration monitoring of a purposeful Positive Behavioral Intervention and Supports (PBIS) system would greatly affect both the culture of the students throughout Trimble Local, as well as allowing their staff to better focus on the instructional aspect of their job and relieve a lot of unnecessary stress.
- It is strongly recommended that Trimble Local continue to work on revising, implementing and training all staff members with their Functional Behavior Assessment (FBA)/Behavior Intervention Plan (BIP) process along with follow-through, including procedures for conducting meaningful manifestation determinations.
- District leadership values their co-teaching model and interviews suggest that both general education and special education staff are supportive of the co-teaching model of instruction. Taking this interest and investing in a solid approach to co-teaching may prove effective for the district in multiple ways. Continuing to advance the practice of co-teaching would ensure that all teachers are provided necessary training and afforded shared planning and communication time. Co-teaching may also serve to strengthen the communication between general education and special education teachers at both the classroom and administration levels, leading to greater success for all students. Also, allowing other staff members to observe “master teachers” co-teaching a lesson would also be beneficial to all involved.