

Warren City School District IRN: 044990
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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 Warren City 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 December 3 and 4, 2019, 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

Warren City School District mailed 822 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 December 3, 2019, OEC consultants held a public meeting for parents and other interested parties. 0 parents and family members and 3 State Support Team (SST) Region 5 representatives attended the public meeting. Attendees could speak to OEC representatives publicly in the meeting, speak to OEC representatives individually, provide written comments or both. 0 attendees made comments during the public meeting. Written comment forms were available before, during and after the meeting. OEC received 0 written comments and 2 phone calls.

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 23 records of students with disabilities. OEC selected records of students with disabilities from a variety of disability categories and ages. OEC conducted 14 IEP Verifications and some areas of concern were found regarding the implementation of the IEP within various classroom settings.

4. Staff/Administrative Interviews

On December 3, 2019, OEC consultants held 13 sessions of interviews with 14 administrators and 105 teachers, school counselors, paraprofessionals, 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 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: April 27, 2020

OEC Trainings

As part of the OEC monitoring process, Warren City School District personnel, as identified by OEC, are required to complete the Special Education Essentials 2019-20 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: (May 28, 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: September 2, 2020

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: February 1, 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) 752-1398, 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>Four 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>Interview participants confirmed that, although interventions are provided through various processes across the district, the results are not uniformly documented in ETRs.</p> <p>Teachers also stated a need for a refresher course over the Intervention Assistance Team (IAT) process as a whole and another for the types of Tier I, II and III interventions they can provide to the student within the process.</p> <p><u>Other Considerations</u></p> <p>It is recommended Warren City 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><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 team report, or reevaluations, if applicable.</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	
CF-3	300.501(b)(1) 3301-51-06 (E)(2)(a)	<p><u>Record Review</u></p> <p>Three student records did not show evidence that the parent was afforded the opportunity to participate in the evaluation team planning meeting.</p> <p><u>Interviews</u></p> <p>It was mentioned in the interview process that intervention specialists did not know or were not clear on the ETR process and would like to be more involved in the entire ETR process.</p> <p><u>Other Considerations</u></p> <p>It is strongly recommended that Warren City Schools 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 and; • Appropriate evaluation data are available. <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.</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>	<p><input checked="" type="checkbox"/> No</p> <p>The educational agency does <u>not</u> need to address this finding in a Corrective Action Plan.</p>
CF-4	300.300	<p><u>Record Review</u></p> <p>Eight student records did not provide evidence of parental consent obtained prior to new testing.</p> <p><u>Interviews</u></p> <p>During the interview sessions, it was brought to our attention the reason for consent over the phone was due to the population and special circumstances with which Warren City Schools deals.</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><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> Several of the PR-05s were signed by the parent with the statement "Via phone conference." Informed written consent must be written consent by the parent.</p> <p>Warren City Schools will need to develop written policy outlining the process they will undergo to ensure informed written consent is provided by the parent.</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> 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>	
CF-5	300.304(c)(4) 3301-51-01 3301-51-06 (E)(2)(a)	<p><u>Record Review</u> Seventeen (17) evaluations did not provide evidence that the evaluation addresses all areas related to the suspected disability.</p> <p><u>Interviews</u> Staff members stated that no guidance has been provided regarding the compliant way for them to complete any Part 1 they were assigned to complete by the School Psychologist.</p> <p><u>Other Considerations</u> Warren City 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</p>	<p><u>Individual Correction</u> The educational agency will convene the ETR teams to conduct a reevaluation and provide evidence that the evaluation addresses all areas related to the suspected disability.</p> <p><u>Systemic Correction</u> The educational agency must submit evidence to OEC of written procedures and practices to provide evidence that the evaluation addresses all areas related to the suspected disability.</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>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 evaluator’s assessment.</p> <p>Questionnaires and checklists provide information for the team; however, they must be included in a team member’s Part 1 report and summarized in Part 2.</p>		
CF-6	300.306(c)	<p><u>Record Review</u></p> <p>Thirteen (13) 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 1 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>	<input checked="" type="checkbox"/> Yes <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>Seven evaluation team reports did not contain a clear and succinct description of educational needs.</p> <p><u>Other Considerations</u></p> <ul style="list-style-type: none"> • Educational needs were sometimes generic in nature and did not address the child’s individualized needs. • Sometimes educational needs were stated in Part 1 but were not included into the Part 2 summary. 	<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>	<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	
CF-8	300.306(c)	<p><u>Record Review</u></p> <p>Five evaluation team reports did not contain specific implications for instruction.</p> <p><u>Other Considerations</u></p> <p>Records reviewed were missing implications for instruction. This would provide the parents with an understanding of where their child is regarding their academic growth.</p> <p>Sometimes implications for instruction were stated in Part 1 but were not included into the Part 2 summary</p>	<p><u>Individual Correction</u></p> <p>The educational agency will reconvene the ETR teams to conduct a reevaluation and provide a clear 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>
CF-9	300.306(a)(1) 3301-51-01 (B)(21)	<p><u>Record Review</u></p> <p>Five 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>Individual Correction</u></p> <p>The educational agency must provide evidence that the ETR teams and other qualified professionals, as appropriate, participated in the determination of eligibility and educational needs. If not, the ETR team must reconvene and provide OEC evidence of group participation.</p> <p><u>Systemic Correction</u></p> <p>The educational agency must submit evidence to OEC of written procedures and practices regarding the eligibility determination process.</p>	<p><input checked="" type="checkbox"/> No</p> <p>The educational agency does <u>not</u> need 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>Five 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>Other Considerations</u></p> <p>Training must be provided to all ETR and IEP members responsible for assessing and writing transition plans to ensure they are compliant and beneficial to the student.</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>Students must be invited to attend their own IEP meeting when transition planning is being considered, starting at age 14 or younger, if appropriate.</p> <p>In addition, transition services were often generic in nature and not developed to address individual student needs as identified in the AATA. The phrase, “provided an opportunity for”, is not appropriate for transition services.</p> <p>Several Transition Plans did contain the student’s Preferences Interest 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 Warren City Schools to improve their Transition Planning by better connecting student’s PINS to student’s Postsecondary Education, Competitive Employment and Independent Living goals.</p>		
DS-2	300.320(a)(1)	<p><u>Record Review</u></p> <p>Twenty-one (21) 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; and • 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>		
DS-3	300.320(a)(2)(i)	<p><u>Record Review</u></p> <p>Seventeen (17) IEPs did not contain measurable annual goals.</p> <p><u>Interviews</u></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>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 compliantly obtained from staff when they are requested.</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>Five 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 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>Six IEPs did not contain annual goals that address the child's functional area(s) of need.</p> <p><u>Other Considerations</u></p> <p>If functional needs were addressed in the ETR as being an area of concern, they must be addressed in the IEP in some capacity. It can either be addressed as a goal, a related service or a statement that indicates the team has prioritized other needs or found that it is not an area of concern at this time.</p>	<p><u>Individual Correction</u></p> <p>The educational agency must reconvene the teams of the IEPs identified as noncompliant to review and amend the IEP. Annual goals must address the functional needs of the child unless the team provides evidence that the goals were prioritized based on the severity of the needs of the child.</p> <p><u>Systemic Correction</u></p> <p>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"/> 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-6	300.320(a)(4) 3301-51-07 (H)(1)(e)(i)	<p><u>Record Review</u></p> <p>Seven IEPs did not contain a statement of specially designed instruction that addresses the individual needs of the child and supports the annual goals.</p> <p><u>Interviews</u></p> <p>Intervention specialists found it difficult to provide specially designed instruction to their students due to being “pulled” to cover classrooms in the absence of a substitute.</p> <p><u>Other Considerations</u></p> <p>Warren City Schools need to develop some formal process to ensure that all intervention specialists are delivering their required specially designed instruction to their students as it is written in the student’s IEP.</p> <p>An internal monitoring and review system would be very helpful to promote compliance.</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>	<input checked="" type="checkbox"/> Yes <p>The educational agency needs to address this finding in a Corrective Action Plan.</p>
DS-7	300.320(a)(7) 3301-51-07 (H)(1)(i)	<p><u>Record Review</u></p> <p>Four IEPs did not indicate the location where the specially designed instruction will be provided.</p> <p><u>Interviews</u></p> <p>Although general education teachers and intervention specialist teachers report positive working relationships, there is a lack of space in buildings for specially designed instruction to take place.</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 location where the specially designed instruction will be provided.</p> <p><u>Systemic Correction</u></p> <p>The educational agency must submit evidence to OEC of written procedures and practices regarding the IEP process of determining the location where specially designed instruction will occur.</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-8	300.320(a)(7) 3301-51-07 (H)(1)(i)	<p><u>Record Review</u></p> <p>Eight IEPs did not indicate the amount of time and frequency of the specially designed instruction.</p> <p><u>Other Considerations</u></p> <p>Time and frequency must relate to one specific provider. Several of the records reviewed had two providers listed for one specially designed instruction, this was usually for an inclusion/co-teaching type of instruction. <u>Intervention Specialists and related service providers are both able to deliver specially designed instruction; however, if a general education teacher is assigned to assist in the delivery of specially designed instruction, they must be included in the supports for school personnel box. General education teachers are not permitted to be listed as a provider of specially designed instruction.</u></p> <p>Warren City Schools will need to develop a procedure to ensure this type of specially designed instruction provider is correctly documented.</p> <p>Training from SSTs as well as internal monitoring review system would be very helpful to promote compliance in the areas of specially designed instruction.</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 amount of time and frequency of the specially designed instruction.</p> <p><u>Systemic Correction</u></p> <p>The educational agency must submit evidence to OEC of written procedures and practices regarding the IEP process of determining the amount and frequency of specially designed instruction to be provided.</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-9	300.320(a)(4) 3301-51-07 (H)(1)(e)	<u>Record Review</u> One IEP did not identify related services that address the needs of the child and support the annual goals.	<u>Individual Correction</u> The educational agency must reconvene the team of the IEP identified as noncompliant to review and amend the IEP to include related services that were identified as needed in the IEP. <u>Systemic Correction</u> The educational agency must submit evidence to OEC of written procedures and practices regarding the IEP process of addressing identified related service needs.	<input checked="" type="checkbox"/> No The educational agency does <u>not</u> need to address this finding in a Corrective Action Plan.
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> All IEPs identified assistive technology to enable the child to be involved and make progress in the general education curriculum. <u>Other Considerations</u> If assistive technology is mentioned in the student's profile or other location in the IEP, it should be described in the assistive technology element of section 7.	<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-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>Other Considerations</u></p> <p>IEP accommodations listed were not explained regarding conditions and extent of the accommodation. Phrases like “as needed” and “may need” are not acceptable in describing accommodations. Accommodations cannot be the choice of the teacher or the student.</p> <p>Training from SSTs as well as internal monitoring review system would be very helpful to promote compliance in the areas of accommodations.</p>	<p><u>Individual Correction</u></p> <p>The educational agency must reconvene the teams of the IEPs identified as noncompliant to review the accommodations that would directly assist the child to access the course content without altering the scope or complexity of the information taught and include them on the IEP.</p> <p><u>Systemic Correction</u></p> <p>The educational agency must submit evidence to OEC of written procedures and practices regarding accommodations.</p>	<input checked="" type="checkbox"/> Yes <p>The educational agency needs to address this finding in a Corrective Action Plan.</p>
DS-14	300.320(a)(4) 3301-51-07 (H)(1)(e)	<p><u>Record Review</u></p> <p>Fourteen (14) IEPs did not identify modifications to enable the child to be involved and make progress in the general education curriculum.</p> <p><u>Other Considerations</u></p> <p>The extent of modifications must be specific and clearly explained.</p> <p>Training from SSTs as well as internal monitoring review system would be very helpful to promote compliance in the areas of modifications.</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>
DS-15	300.320(a)(4) 3301-51-07 (H)(1)(e)	<p><u>Record Review</u></p> <p>All 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>Individual Correction</u></p> <p>NA</p> <p><u>Systemic Correction</u></p> <p>NA</p>	<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-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>Eleven IEPs did not contain measurable annual goals and services/placement consistent with progress made.</p> <p><u>Other Considerations</u></p> <p>Even though progress was being gathered and reported, it must be recorded using the same performance criteria defined in the annual measurable goal. Progress Reports on annual measurable goals must be provided to parents of a child with a disability at least as often as report cards are issued to all children. If the district provides interim reports to all children, progress reports must be provided to all parents of a child with a disability.</p> <p>Training from SSTs as well as internal monitoring review system would be very helpful to promote compliance in the areas of progress monitoring.</p>	<p><u>Individual Correction</u></p> <p>None</p> <p><u>Systemic Correction</u></p> <p>The educational agency must submit evidence to OEC of written procedures and practices regarding measurable annual goals and services consistent with progress made.</p>	<input checked="" type="checkbox"/> Yes 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-18	3301-51-07(L)	<p><u>Record Review</u></p> <p>Five IEPs did not show evidence that revisions were made based on data indicating changes in student needs or abilities.</p> <p><u>Other Considerations</u></p> <p>Through the review of records and progress reports, it appears Warren City School District's special education staff is not familiar with the IEP amendment process. Warren City Schools can address this issue by providing additional training through the SSTs.</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(l)	<p><u>Record Review</u></p> <p>Six 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>Eight 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>Other Considerations</u></p> <p>Some of the LRE statements were either too generic, referred to the disability as a justification or absent all together.</p> <p>Training from SSTs as well as internal monitoring review system would be very helpful to promote compliance in the areas of Least Restrictive Environment.</p>	<p><u>Individual Correction</u></p> <p>The educational agency must reconvene the teams of the IEPs identified as noncompliant to review and include a justification as to why the child was removed from the general education classroom.</p> <p>The justification should:</p> <ul style="list-style-type: none"> • Be based on the needs of the child, not the disability. • Reflect that the team has given adequate consideration to meeting the student's needs in the general classroom with supplementary aids and services. • Document that the nature or severity of the disability is such that education in general education classes, even with the use of supplementary aids and services, cannot be achieved satisfactorily. • Describe potential harmful effects to the child or others, if applicable. <p><u>Systemic Correction</u></p> <p>The educational agency must submit evidence to OEC of written procedures and practices regarding the least restrictive environment placement decision process.</p>	<p><input checked="" type="checkbox"/> Yes</p> <p>The educational agency needs to address this finding in a Corrective Action Plan.</p>

Commendations for Warren City Schools

- There appeared to be a good relationship between the General Education teachers and Intervention Specialists regarding the co-teaching models Warren City School District has developed.
- Warren City School District has developed a process to ensure parental participation is achieved during ETR and IEP meetings. Because of this out-of-the-box thinking, Warren City School District has been able to obtain a lot of parental participation for their ETR and IEP meetings.
- The addition of Special Education Supervisors within all buildings has provided all staff members with a contact person who has special education knowledge with an open-door policy for questioning who can provide them with correct and immediate feedback.
- Warren City 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 interviewing process, IEP verifications and student/staff interactions.

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.
- Develop a formal process of adopting special education records (3301-51-07 (K)(5)(a)(b) and 3301-51-07 (K)(6)(a)(b)) from out of district/state/country.
- Develop and implement a formal process of tracking specially designed instruction (SDI) to ensure Free Appropriate Public Education (3301-51-07 (K)).
- Develop and implement a formal process of tracking the duration and frequency of students with disabilities who are sent to the district's "Detention or In-School Assignment."
- Warren City 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.
- Warren City Schools would benefit from redefining or refreshing their RTI process so that every staff member knows exactly what is expected of them, how the entire process is carried out (Tiers I, II and III) as well as exactly what kinds of intervention and data collection information is available for them to use.