



April 26, 2023

Wayne County Schools Career Center
IRN: 051722

Ohio the Department of Education, Office for Exceptional Children
2022-2023 IDEA Monitoring Review Summary Report

Introduction

The Ohio Department of Education's Office for Exceptional Children would like to extend appreciation to the Wayne County Schools Career Center staff for their efforts, attention and time committed to the completion of the review process.

Definition of terms in this document

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

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

Overview

The following report is a summary of the onsite review conducted by the Department on January 24 through January 26, 2023, as part of its general supervision requirements under the Individuals with Disabilities Education Act (IDEA) and Am. Sub. H.B.1.

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

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

Onsite reviews are targeted to include the following specific areas:

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

Data Sources

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

1. Parent Input

Wayne County Schools Career Center emailed 236 letters of the Department's notification of review to all families with students with disabilities in the educational agency. The educational agency posted the notification of review on its website which included a link to a recorded presentation from the Department providing an overview of the monitoring review process. The presentation also provides contact information and requests parents to provide comments to the Department regarding the special education program in their school. The notification of review was also posted on the Department's website.

The Department received 1 comment.



2. Pre-Onsite Data Analysis

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

3. Record Review/IEP Verification

Prior to the onsite visit, the Department consultants reviewed 43 records of school age students with disabilities. The Department consultants selected records of students with disabilities from a variety of disability categories and ages. Fourteen (14) student records were selected for IEP verification in the classroom setting. During the IEP verifications, OEC staff noticed that teachers were very knowledgeable of the students' goals and other needs outlined in the IEPs. Students and staff appeared to have built good rapport with each other. Most students seemed very comfortable coming to the Student Assistance Center (SAC) and this was a testament to the relationships that have been built.

4. Staff/Administrative Interviews

On Tuesday, January 24, 2023, the Department consultants held 8 sessions of interviews with 22 administrators and 34 school coordinators, related services personnel, school psychologists, and paraprofessionals.

On Thursday, January 26, 2023, the Department consultants held 5 sessions of interviews with 32 instructors. The Department interviews focused on the following review areas: Child Find; Delivery of Services; Least Restrictive Environment (LRE) and IEP alignment.

Strengths/Commendations:

Wayne County Career Center staff has laid the foundation for setting high expectations for all students to be successful no matter their age, disability category or grade level. This unique and distinctive foundation will allow the school to be successful with their implementation of OEC's Monitoring Process and recommendations.

Staff stated they try hard to engage with parents and build relationships. Teachers are heavily involved with their students and are working with families, looking at the supports that are needed based on academics or behavior.

Wayne County Career Center staff emphasized that their ability to prepare students for current and future employment thanks to their programs, community partnerships and size is a strength. Students have credentials to increase employability when they complete their programs.

Findings of Noncompliance/Required Actions

A finding is made when noncompliance is identified by the Department with IDEA and Ohio Operating Standards requirements. Findings are also made when noncompliance is identified in relation to the evaluation team report (ETR) and/or individualized education program (IEP) requirements. For a noncompliance level of 30% or greater in any single area or for identified areas of concern that did not reach 30% or greater, a Corrective Action Plan (CAP) will be developed to address those areas. All noncompliance identified by the Department as part of the review (listed by subject area in the *Department's Review Findings and Educational Agency Required Actions Table*) must be corrected as indicated in the *Evidence of Correction/Recommendations* column.

Refer to the details of requirements in the **Evidence of Findings and Evidence of Correction/Recommendations table below**, and the attached **Individual Record Review Comment Sheets for specific individual record corrections**.



The Department provides separate written correspondence to the parent/guardian when action is required to correct findings of noncompliance for individual students. The educational agency will receive copies of this correspondence.

Corrective Action Plan (CAP)

The educational agency will develop a CAP to address any items identified in this summary report. An approved form for the CAP will be provided by the Department or can be accessed on the Department's website by using the keyword search "Monitoring". The CAP developed by the educational agency with SST assistance must include the following:

- Activities to address all areas identified in this summary report;
- Documentation/evidence of implementation of the activities;
- Individuals responsible for implementing the activities;
- Resources needed;
- Completion dates; and
- Continued Plan for Improvement and/or Compliance.

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

CAP Due Date: August 30, 2023

Department Trainings

As part of the Department monitoring process, Wayne County Schools Career Center personnel, as identified by the Department, are required to complete the OEC Required Special Education Essentials training modules within the Learning Management System (LMS). The Department will provide specific instructions on completing these training modules during the Summary Report presentation. Participants must achieve 80% or more on each quiz. Participants who do not achieve at least 80% will be contacted by the State Support Team (SST) for additional training.

Completion of LMS Training Modules Due Date: August 30, 2023

Individual Correction

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

Individual Correction Due Date: October 18, 2023

CAP Activities and Systemic Correction

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

Completion of CAP Activities and Systemic Correction Due Date: January 29, 2024

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

For questions regarding the review, please contact: Chralin Forsthoefel the Department's IDEA Monitoring Contact, at 614-595-4088, toll-free at (877) 644-6338, or by e-mail at Chralin.forsthoefel@education.ohio.gov.



The Department’s Review Findings and Educational Agency Required Actions

Component 1: Child Find

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

Record Review Item	Evidence of Findings	Evidence of Corrections/Recommendations	Must be addressed in CAP
CF-1	<p>Record Review</p> <p>34 CFR 300.305(a) [Review of Existing evaluation data] and OAC 3301-51-11 (c)(1)(a) [Preschool children eligible for special education]</p> <p>Preschool records were not reviewed.</p>	<p><u>Individual Correction</u> NA</p> <p><u>Systemic Correction</u> NA</p>	<input checked="" type="checkbox"/> NA
CF-2	<p>Record Review</p> <p>OAC 3301-51-06 [Evaluations]</p> <p>Twenty (20) out of 42, or 48%, evaluations reviewed did not appropriately document interventions provided to resolve concerns for the child performing below grade-level standards.</p>	<p><u>Individual Correction</u> The Department has verified that these students have a current ETR in place, so no additional individual correction is required.</p> <p><u>Systemic Correction</u> The educational agency must submit evidence to the Department of written procedures and practices regarding documentation of intervention and supports provided prior to completion of the initial and reevaluation team report.</p>	<input checked="" type="checkbox"/> Yes The educational agency needs to address this finding in a Corrective Action Plan.
	<p>Interviews/Public Comments</p> <p>Interview participants confirmed that, although interventions are provided through various processes across the district, they are not uniformly documented in ETRs. It appears, based upon interview responses, that there has been an outlined process that sometimes is not followed or that some staff members do not know exists. Participants agreed that they would like it to be updated.</p> <p>Interviews identified an opportunity to strengthen the intervention documentation process for initial and reevaluations.</p>	<p><u>Opportunities for Improvement</u> It is recommended Wayne County Career Center and associate educational agencies develop a procedure of checks and balances to ensure interventions that are being provided to students are correctly documented within Part 1s of the ETR as well as in</p>	



Record Review Item	Evidence of Findings		Evidence of Corrections/Recommendations	Must be addressed in CAP
		<p>Teachers and administrators stated a need for a refresher course on the agency wide intervention process as a whole and another for the types of Tiers I, II and III interventions they can provide to students within the process.</p>	<p>Part 2s Summary of Interventions. Wayne County Career Center would benefit from revising the agency wide intervention process to include other staff across the educational agency.</p>	
	<p>Concerns Noted</p>	<p>It was noted during the review of reevaluations, the educational agencies failed to provide a statement that it was determined by the ETR team that the student was making adequate progress with current special education supports and services.</p>		
<p>CF-3</p>	<p>Record Review</p>	<p>34 CFR 300.501(b) [Parent participation in meetings] and OAC 3301-51-06 (E)(2)(a) [Evaluation procedures].</p> <p>Five out of 42, or 12%, student records reviewed did not show evidence that the parent was afforded the opportunity to participate in the evaluation team planning process.</p>	<p><u>Individual Correction</u></p> <p>The educational agency must provide evidence that the parent was involved or provided the opportunity to participate in the evaluation planning process. The evidence may include evaluation planning form, prior written notice, parent invitation, referral form or communication log.</p> <p><u>Systemic Correction</u></p> <p>The educational agency must submit evidence to the Department 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>



Record Review Item	Evidence of Findings		Evidence of Corrections/Recommendations	Must be addressed in CAP
CF-4	Record Review	<p>34 CFR 300.300 [Parental Consent] Fifteen (15) out of 42, or 36%, student records reviewed did not provide evidence of parental consent obtained prior to evaluation.</p>	<p><u>Individual Correction</u> 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><input checked="" type="checkbox"/> Yes The educational agency needs to address this finding in a Corrective Action Plan.</p>
	Interviews/Public Comments	<p>Staff stated that they attempted a lot of different avenues to obtain signatures from parents.</p>	<p>The evidence may include, prior written notice, parent invitation, communication log, or other documented attempts to obtain parental informed, written consent.</p>	
	Concerns Noted	<p>Although attempts are made to obtain parental consent for evaluations, this process should be strengthened through a written, agency wide policy.</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 the Department of written procedures and practices for obtaining informed parental consent.</p> <p><u>Opportunities for Improvement</u> There is an opportunity for the educational agency to strengthen the policies and practices for obtaining written, informed consent for evaluations.</p>	



Record Review Item	Evidence of Findings		Evidence of Corrections/Recommendations	Must be addressed in CAP
CF-5	Record Review	<p>34 CFR 300.304(c)(4) [Other evaluation procedures] OAC 3301-51-01 [Applicability of requirements and definitions] and 3301-51-06 (E)(2)(a) [Evaluation procedures]</p> <p>Thirty-nine (39) out of 42, or 93%, evaluations reviewed did not provide evidence that the evaluation addresses all areas related to the suspected disability.</p>	<p><u>Individual Correction</u></p> <p>The educational agency will convene the ETR teams to conduct a reevaluation and provide evidence that the evaluation addresses all areas related to the suspected disability.</p> <p><u>Systemic Correction</u></p> <p>The educational agency must submit evidence to the Department of written procedures and practices to provide evidence that the evaluation addresses all areas related to the suspected disability.</p>	<p><input checked="" type="checkbox"/> Yes</p> <p>The educational agency needs to address this finding in a Corrective Action Plan.</p>
	Interviews/Public Comments	<p>Staff indicated that they are unsure how to complete the Part 1's and could benefit from training.</p>	<p>Wayne County Career Center and Associate Districts 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. 	
	Concerns Noted	<p>During the review of records, it was noted that several Part 1s were either missing the required components or were identified on the planning form but not included in a Part 1.</p>	<p><u>Opportunities for Improvement</u></p> <p>There is an opportunity to provide professional development and technical assistance to support staff with the completion of the Part 1s, especially with identifying educational needs and specific implications for instruction.</p>	



Record Review Item	Evidence of Findings		Evidence of Corrections/Recommendations	Must be addressed in CAP
CF-6	Record Review	<p>34 CFR 300.306(c) [Procedures for determining eligibility and educational need] Thirty-three (33) out of 42, or 79%, evaluations reviewed did not show evidence of clearly stating the summary of assessment results.</p>	<p><u>Individual Correction</u> The educational agency will reconvene the ETR teams to conduct a reevaluation and provide a clear and concise summary of the data and assessment conducted that meets the requirements of 3301-51-06 (G) (Summary of information). The IEP team must consider the results of this reevaluation.</p>	<p><input checked="" type="checkbox"/> Yes The educational agency needs to address this finding in a Corrective Action Plan.</p>
	Interviews/Public Comments	<p>Staff indicated that they are not actively involved in the development of the Part 2 summary of assessment results.</p>	<p><u>Systemic Correction</u> The educational agency must submit evidence to the Department of written procedures and practices regarding summary of data and assessment results.</p>	
	Concerns Noted	<p>During the review of records, 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>Opportunities for Improvement</u> Wayne County Career Center has an opportunity to develop an internal practice that will monitor the completion of the Part 2 Summary of Assessment Results so that all areas assessed in a Part 1 Individual Evaluator's Assessment are summarized in the Part 2 summary. This is an opportunity for professional development and/or targeted technical assistance from SST staff.</p>	
CF-7	Record Review	<p>34 CFR 300.306(c) [Procedures for determining eligibility and educational need] Twenty-four (24) out of 42, or 57%, evaluation team reports reviewed did not contain a clear and succinct description of educational needs.</p>	<p><u>Individual Correction</u> 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><input checked="" type="checkbox"/> Yes The educational agency needs to address this finding in a Corrective Action Plan.</p>
	Interviews/Public Comments	<p>Staff indicated a need for professional development in the areas of identifying appropriate educational needs based upon the summary of assessments.</p>		



Record Review Item	Evidence of Findings		Evidence of Corrections/Recommendations	Must be addressed in CAP
	Concerns Noted	<p>Educational needs were sometimes generic in nature and did not address the child's individualized needs.</p> <p>Sometimes Educational Needs were stated in Part 1 but were not included in the Part 2 Summary of Assessment Results.</p>	<p><u>Systemic Correction</u> The educational agency must submit evidence to the Department of written procedures and practices regarding description of educational needs.</p> <p><u>Opportunities for Improvement</u> Wayne County Career Center has an opportunity to develop an internal practice to monitor the completion of the Part 2 Summary of Assessment Results so that all areas assessed in a Part 1 Individual Evaluator's Assessment are summarized in the Part 2 summary. This is an opportunity for professional development and/or targeted technical assistance from the State Support Team staff.</p>	
CF-8	Record Review	<p>34 CFR 300.306(c) [Procedures for determining eligibility and educational need]</p> <p>Twenty-one (21) out of 42, or 50%, evaluation team reports reviewed did not contain specific implications for instruction.</p>	<p><u>Individual Correction</u> 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><input checked="" type="checkbox"/> Yes The educational agency needs to address this finding in a Corrective Action Plan.</p>
	Interviews/Public Comments	<p>Staff indicated a need for professional development in the areas of identifying appropriate implication for instruction based upon the summary of assessments.</p>	<p><u>Systemic Correction</u> The educational agency must submit evidence to the Department of written procedures and practices regarding implications for instruction.</p> <p><u>Opportunities for Improvement</u></p>	
	Concerns Noted	<p>Sometimes implications for instruction were stated in Part 1 but were not included in the Part 2 summary.</p>	<p>Wayne County Career Center has an opportunity to develop an internal practice to monitor the completion of the Part 2 Summary of Assessment Results so that all areas assessed in a Part 1 Individual Evaluator's Assessment are summarized in the Part 2 summary. This is an opportunity for professional development and/or targeted technical assistance from SST staff.</p>	



Record Review Item	Evidence of Findings		Evidence of Corrections/Recommendations	Must be addressed in CAP
CF-9	Record Review	<p>34 CFR 300.306(a)(1) [Determination of eligibility] OAC 3301-51-01 (B)(21) [Applicability of requirements and definitions]</p> <p>Eight out of 42, or 19%, evaluations reviewed did not show evidence that a group of qualified professionals, as appropriate to the suspected disability, were involved in determining whether the child is a child with a disability as well as the child's educational needs.</p>	<p><u>Individual Correction</u></p> <p>The educational agency must provide evidence that the ETR teams and other qualified professionals, as appropriate, participated in the determination of eligibility and educational needs. If not, the ETR team must reconvene and provide the Department evidence of group participation.</p> <p><u>Systemic Correction</u></p> <p>The educational agency must submit evidence to the Department of written procedures and practices regarding the eligibility determination process.</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>
	Interviews/Public Comments	<p>Interviewees stated that if a member of the team was unable to attend, they typically ask someone in the same position to attend.</p>		
CF-10	Record Review	<p>OAC 3301-51-01 (B)(10) [Definitions] and 3301-51-06 [Evaluations]</p> <p>Thirty-five (35) out of 42, or 83%, evaluations reviewed did not provide a justification for the eligibility determination decision.</p>	<p><u>Individual Correction</u></p> <p>The educational agency will reconvene the ETR teams to conduct a reevaluation and provide a clear justification for the eligibility determination.</p> <p><u>Systemic Correction</u></p> <p>The educational agency must submit evidence to the Department of written procedures and practices regarding the eligibility determination decision.</p> <p><u>Opportunities for Improvement</u></p> <p>The educational agency would benefit from professional development from the State Support Team on how to write a compliant justification statement for the disability determination.</p>	<p><input checked="" type="checkbox"/> Yes</p> <p>The educational agency needs to address this finding in a Corrective Action Plan.</p>
	Interviews/Public Comments	<p>Staff indicated they could use additional training to understand how to write a compliant justification statement for the disability determination.</p>		
	Concerns Noted	<p>In many cases the justification failed to identify how the disability affects the child's progress in the general education curriculum.</p>		



Component 2: Delivery of Services

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

Record Review Item	Evidence of Findings		Evidence of Correction/Recommendations	Must be addressed in CAP
DS-1	Record Review	<p>SPP Indicator 13 34 CFR 300.320(b) [Transition services] OAC 3301-51-07 (H)(2) [Definition of individualized education program]</p> <p>Forty-three (43) out of 43, or 100%, IEPs reviewed 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>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 the Department of written procedures and practices regarding transition services.</p> <p><u>Opportunities for Improvement</u></p> <p>There is a need for all personnel involved with students of transition age to be trained in, and familiar with, the secondary transition process, including responsibilities at every level.</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><input checked="" type="checkbox"/> Yes</p> <p>The educational agency needs to address this finding in a Corrective Action Plan.</p>



Record Review Item	Evidence of Findings		Evidence of Correction/Recommendations	Must be addressed in CAP
	Interviews/Public Comments	Interviews noted a lack of understanding of the secondary transition process and responsibilities, indicating a need for training and technical assistance in this area.		
	Concerns Noted	Transition Services were sometimes not written as to what the district will provide to the student. Some of the postsecondary goals had “would like to,” stated when referencing what the student’s career choice or independent living preference. Postsecondary goals must be written as to what the student will do.		
DS-2	Record Review	34 CFR 300.320(a)(1) [Definition of individualized education program] Thirty-nine (39) out of 43, or 91%, IEPs reviewed did not contain Present Levels of Academic Achievement and Functional Performance (PLOP) that addressed the needs of the student.	<u>Individual Correction</u> Present Levels of Performance must include the following information as it relates to each goal: <ul style="list-style-type: none"> • Summary of current daily academic/behavior and/or functional performance compared to expected grade-level standards or to expected age-appropriate performance in order to provide a frame of reference for annual goal development in the specific area of academic and/or functional need; • Baseline data provided for developing a measurable goal (for example, ETR results, if current, formative academic assessments, curriculum-based measurements, transition assessments or functional behavior assessments); • Current performance measurement directly relates to the goal measurement. <u>Systemic Correction</u> The educational agency must submit evidence to the Department of written procedures and practices	<input checked="" type="checkbox"/> Yes The educational agency needs to address this finding in a Corrective Action Plan.
	Interviews/Public Comments	There is a lack of understanding across staff members regarding the required components of the present levels for IEP goals. This points to an opportunity to further develop and deploy training and technical assistance in this area. Staff indicated that even though training is provided there is no follow through to ensure fidelity of implementation.		
	Concerns Noted	Record reviews revealed that present levels often lacked clear baseline data that directly reflected the measurement established in the corresponding goals.		



Record Review Item	Evidence of Findings		Evidence of Correction/Recommendations	Must be addressed in CAP
			regarding the review of current academic/functional data when writing IEPs. <u>Opportunities for Improvement</u> There is an opportunity for professional development and/or targeted technical assistance in developing Present Levels of Academic Achievement and Functional Performance (PLOP) that clearly address the needs of the student, as well as relate to the measurable goals.	
DS-3	Record Review	34 CFR 300.320(a)(2)(i) [Definition of individualized education program] Twenty-six (26) out of 43, or 60%, IEPs reviewed did not contain measurable annual goals.	<u>Individual Correction</u> 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: 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. <u>Systemic Correction</u> The educational agency must submit evidence to the Department of written procedures and practices regarding the development of measurable annual IEP goals. <u>Opportunities for Improvement</u> There is an opportunity for professional development and targeted technical assistance in writing compliant measurable annual goals.	<input checked="" type="checkbox"/> Yes The educational agency needs to address this finding in a Corrective Action Plan.
	Interviews/Public Comments	During the interview sessions staff members indicated a need for professional development on how to write measurable goals.		
	Concerns Noted	Goals often did not contain all required elements or were worded in a confusing manner with too many measurements or skills in one goal. At times, the IEP goals lacked clarity of behaviors expected and of the specific measurements for achievement and mastery of the goals.		



Record Review Item	Evidence of Findings		Evidence of Correction/Recommendations	Must be addressed in CAP
DS-4	Record Review	<p>34 CFR 300.320(a)(2)(i) [Definition of individualized education program]</p> <p>Five out of 43, or 12%, IEPs reviewed did not contain annual goals that address the child's academic area(s) of need.</p>	<p><u>Individual Correction</u> The educational agency must reconvene the teams of the IEPs identified as noncompliant to review and amend the IEP. Annual goals must address the 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> The educational agency must submit evidence to the Department 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	Record Review	<p>34 CFR 300.320(a)(2)(i) [Definition of individualized education]</p> <p>Six out of 18, or 33%, applicable IEPs reviewed did not contain annual goals that address the child's functional area(s) of need.</p>	<p><u>Individual Correction</u> The educational agency must reconvene the teams of the IEPs identified as noncompliant to review and amend the IEP. Annual goals must address the functional needs of the child unless the team provides evidence that the goals were prioritized based on the severity of the needs of the child.</p> <p><u>Systemic Correction</u> The educational agency must submit evidence to the Department 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>
	Interviews/Public Comments	<p>Staff mentioned they were unsure how to correctly identify functional needs in the ETR which made it difficult to ensure those identified needs are addressed in the IEP.</p>	<p><u>Systemic Correction</u> The educational agency must submit evidence to the Department of written procedures and practices regarding the IEP process of addressing identified functional needs.</p>	
	Concerns Noted	<p>Functional needs were mentioned in several ETRs as being an area of need but were not addressed in the IEP or noted as not a priority at this time.</p>	<p><u>Opportunities for Improvement</u> If the ETR identifies functional needs as being an area of concern, they must be addressed in the IEP in some capacity. They can either be addressed as a goal, a related service, accommodations or a statement in the Profile that indicates the team has prioritized other needs or found that it is not an area of concern at this time. This can be addressed in training provided by the State Support Team.</p>	



Record Review Item	Evidence of Findings		Evidence of Correction/Recommendations	Must be addressed in CAP
DS-6	Record Review	<p>34 CFR 300.320(a)(4) [Definition of individualized education program] OAC 3301-51-07 (H)(1)(e)(i) [Definition of IEP]</p> <p>Thirty-two (32) out of 43, or 74%, IEPs reviewed did not contain a statement of specially designed instruction including related services that addresses the individual needs of the child and supports the annual 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 the specially designed instruction, as appropriate, to address the needs of the child.</p> <p><u>Systemic Correction</u></p> <p>The educational agency must submit evidence to the Department of written procedures and practices regarding the IEP process of determining specially designed instruction.</p> <p><u>Opportunities for Improvement</u></p> <p>It is recommended that professional development in the area of writing compliant SDI be provided by the State Support Team.</p>	<p><input checked="" type="checkbox"/> Yes</p> <p>The educational agency needs to address this finding in a Corrective Action Plan.</p>
	Interviews/Public Comments	<p>Although most respondents indicated familiarity with the required elements for SDI components, there is still a need for further training and technical assistance in this area.</p>		
	Concerns Noted	<p>Review of records indicated that the SDI statement was missing instructional levels and specific skills to describe how the SDI differs from the general education instruction.</p>		
DS-7	Record Review	<p>34 CFR 300.320(a)(7) [Definition of individualized education program] OAC 3301-51-07 (H)(1)(i) [Definition of IEP]</p> <p>Twenty-one (21) out of 43, or 49%, IEPs reviewed did not indicate the specific location where the specially designed instruction will be provided.</p>	<p><u>Individual Correction</u></p> <p>The educational agency must reconvene the teams of the IEPs identified as noncompliant to review and amend the location where the specially designed instruction will be provided.</p> <p><u>Systemic Correction</u></p> <p>The educational agency must submit evidence to the Department of written procedures and practices regarding the IEP process of determining the location where specially designed instruction will occur.</p>	<p><input checked="" type="checkbox"/> Yes</p> <p>The educational agency needs to address this finding in a Corrective Action Plan.</p>
	Interviews/Public Comments	<p>Staff were unclear exactly where students were receiving their specially designed instruction.</p>		
	Concerns Noted	<p>Records reviewed had locations listed as "Learning Environment" and "small group classroom." These locations are too generic and do not identify where the student is receiving instruction. The educational agency needs to specify where within the school the specially designed instruction including related services will be delivered.</p>		



Record Review Item	Evidence of Findings		Evidence of Correction/Recommendations	Must be addressed in CAP
DS-8	Record Review	<p>34 CFR 300.320(a)(7) [Definition of individualized education program] OAC 3301-51-07 (H)(1)(i) [Definition of IEP]</p> <p>Thirteen (13) out of 43, or 30%, IEPs reviewed did not indicate the amount of time and frequency of the specially designed instruction.</p>	<p><u>Individual Correction</u> The educational agency must reconvene the teams of the IEPs identified as noncompliant to review and amend the amount of time and frequency of the specially designed instruction.</p> <p><u>Systemic Correction</u> The educational agency must submit evidence to the Department of written procedures and practices regarding the IEP process of determining the amount and frequency of specially designed instruction to be provided.</p> <p><u>Opportunity for Improvement</u> It is recommended that professional development in the area of writing compliant SDI be provided by the State Support Team.</p>	<p><input checked="" type="checkbox"/> Yes</p> <p>The educational agency needs to address this finding in a Corrective Action Plan.</p>
	Interviews/Public Comments	<p>Staff members indicated a need for a universal tracking system for SDI.</p> <p>Across interviews, it was noted there are discrepancies about how the district is tracking SDI minutes.</p>		
	Concerns Noted	<p>Frequency was not compliant due to being listed as monthly/quarterly.</p>		
DS-9	Record Review	<p>34 CFR 300.324(a)(2)(v) [Development of IEP] OAC 3301-51-01(B)(3) [Applicability of requirements and definitions]</p> <p>Two out of five, or 40%, applicable IEPs reviewed did not identify assistive technology to enable the child to be involved and make progress in the general education curriculum.</p>	<p><u>Individual Correction</u> The educational agency must reconvene the teams of the IEPs identified as noncompliant to review assistive technology and/or services that would directly assist the child with a disability to increase, maintain, or improve their functional capabilities and include them on the IEP.</p> <p><u>Systemic Correction</u> The educational agency must submit evidence to the Department of written procedures and practices regarding assistive technology.</p> <p><u>Opportunities for Improvement</u> Wayne County Career Center to add this area in their internal monitoring process.</p>	<p><input checked="" type="checkbox"/> Yes</p> <p>The educational agency needs to address this finding in a Corrective Action Plan.</p>
	Interviews/Public Comments	<p>During the interview sessions staff appeared to be unaware that assistive technology should be available to students at all times and not “as needed.”</p>		
	Concerns Noted	<p>Assistive technology was mentioned in the ETR as a need but was not addressed in the IEP. Assistive technology must describe what will be provided to the student, for what purpose, under what conditions, how often, and to what extent.</p>		



Record Review Item	Evidence of Findings		Evidence of Correction/Recommendations	Must be addressed in CAP
DS-10	Record Review	<p>34 CFR 300.320(a)(6)(i) [Definition of individualized education] OAC 3301-51-07 (H)(1)(g) [Definition of IEP]</p> <p>Thirty-three (33) out of 43, or 77%, IEPs reviewed did not identify accommodations provided to enable the child to be involved and make progress in the general education curriculum.</p>	<p><u>Individual Correction</u> The educational agency must reconvene the teams of the IEPs identified as noncompliant to review the accommodations that would directly assist the child to access the course content without altering the scope or complexity of the information taught and include them on the IEP.</p> <p><u>Systemic Correction</u> The educational agency must submit evidence to the Department of written procedures and practices regarding accommodations.</p> <p><u>Opportunities for Improvement</u> Training from the State Support Team as well as an internal monitoring review system would be very helpful to promote compliance in the area of accommodations.</p>	<p><input checked="" type="checkbox"/> Yes</p> <p>The educational agency needs to address this finding in a Corrective Action Plan.</p>
	Interviews/Public Comments	<p>Staff are aware of students' need for accommodations but are not aware of how much detail they should add in an IEP so that the students' needs can be met by any teacher in any district.</p>		
	Concerns Noted	<p>The conditions and/or extent of each accommodation were not explained (just listed). These accommodations should be explained. Not doing so may prevent the student from receiving needed accommodations due to a lack of communication. The conditions for and the extent of the accommodations must always be clear, specific and transferable to another district.</p>		
DS-11	Record Review	<p>34 CFR 300.320(a)(4) [Definition of individualized education program] OAC 3301-51-07 (H)(1)(e) [Definition of IEP]</p> <p>Two out of four, or 50%, applicable IEPs reviewed did not identify modifications to enable the child to be involved and make progress in the general education curriculum.</p>	<p><u>Individual Correction</u> The educational agency must reconvene the teams of the IEPs identified as noncompliant to review 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><input checked="" type="checkbox"/> Yes</p> <p>The educational agency needs to address this finding in a Corrective Action Plan.</p>
	Interviews/Public Comments	<p>Several staff members indicated a need for professional development in writing compliant modifications that meet the needs of a student.</p>		



Record Review Item	Evidence of Findings		Evidence of Correction/Recommendations	Must be addressed in CAP
	Concerns Noted	The extent of and conditions for modifications must be explained. Refer to the current level of instruction, reading level or pace of instruction.	<p>The educational agency must submit evidence to the Department of written procedures and practices regarding modifications.</p> <p><u>Opportunities for Improvement</u></p> <p>Training from the State Support Team as well as an internal monitoring review system would be very helpful to promote compliance in the area of modifications.</p>	
DS-12	Record Review	<p>34 CFR 300.320(a)(4) [Definition of individualized education program] OAC 3301-51-07 (H)(1)(e) [Definition of IEP]</p> <p>Two out of eight, or 25%, applicable IEPs reviewed 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>The educational agency must reconvene the teams of the IEPs identified as noncompliant to review the supports for school personnel that were identified by the IEP team and define the supports on the IEP including who will provide the support and when it will take place.</p> <p><u>Systemic Correction</u></p> <p>The educational agency must submit evidence to the Department of written procedures and practices regarding supports for school personnel.</p>	<input checked="" type="checkbox"/> No The educational agency does <u>not</u> need to address this finding in a Corrective Action Plan.
DS-13	Record Review	<p>OAC 3301-51-07 (H)(1)(h)(ii) [Definition of IEP]</p> <p>All applicable student records reviewed had 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



Record Review Item	Evidence of Findings		Evidence of Correction/Recommendations	Must be addressed in CAP
DS-14	Record Review	<p><i>OAC 3301-51-07(L)(2) [Development, review and revision of IEP]</i></p> <p>Seven out of 41, or 17%, applicable student records reviewed did not show evidence of progress reporting data collected and analyzed to monitor performance on each goal.</p> <p>The process for monitoring, recording and reporting progress on annual goals appeared to be inconsistent and not entirely based upon measurements directly related to the goal measurements.</p>	<p><u>Individual Correction</u></p> <p>None</p> <p><u>Systemic Correction</u></p> <p>The educational agency must submit evidence to the Department of written procedures and practices regarding measurable annual goals and services consistent with progress made.</p>	<p><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-15	Record Review	<p><i>OAC 3301-51-07(L) [Development, review and revision of IEP]</i></p> <p>Five out of eight, or 63%, applicable IEPs reviewed did not show evidence that revisions were made based on data indicating changes in student needs or abilities.</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><input checked="" type="checkbox"/> Yes</p> <p>The educational agency needs to address this finding in a Corrective Action Plan.</p>
	Interviews/Public Comments	<p>During interview sessions, it was shared that staff are aware of the process for amending the IEP; however, the data from progress monitoring did not indicate that staff executed the process when the progress notes showed a need.</p>	<p>The educational agency must submit evidence to the Department of written procedures and practices regarding using data to revise IEPs based on changes in student needs or abilities.</p> <p><u>Opportunities for Improvement</u></p>	
	Concerns Noted	<p>Data indicated a need for a possible revision, but no revision or meeting to discuss instructional strategies was evident in student records. The IEP team should reconvene to address issues such as chronic absences or lack of progress.</p>	<p>Training from State Support Team staff as well as an internal monitoring review system would be helpful to promote compliance in the area of IEP revisions based on data.</p>	



Record Review Item	Evidence of Findings		Evidence of Correction/Recommendations	Must be addressed in CAP
DS-16	Record Review	<p>34 CFR 300.321(5) [IEP team] OAC 3301-51-07(I) [IEP team]</p> <p>Two out of 43, or 5%, IEPs reviewed 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 the Department 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	Evidence of Findings		Evidence of Correction/Recommendations	Must be addressed in CAP
LRE-1	Record Review	<p>34 CFR 300.114 [LRE requirements] and 300.320(a)(5) [Definition of individualized education program] OAC 3301-51-07 (H)(1)(f) [Definition of individualized education program]</p> <p>Thirty-two (32) out of 38, or 84%, applicable IEPs reviewed did not include an explanation of the extent to which the child will not participate with nondisabled children in the general education classroom.</p>	<p><u>Individual Correction</u> The educational agency must reconvene the teams of the IEPs identified as noncompliant to review and include a justification as to why the child was removed from the general education classroom. The justification should:</p> <ul style="list-style-type: none"> • Be based on the needs of the child, not the disability. • Reflect that the team has given adequate consideration to meeting the student’s needs in the general classroom with supplementary aids and services. • Document that the nature or severity of the disability is such that education in general education classes, even with the use of supplementary aids and services, cannot be achieved satisfactorily. • Describe potential harmful effects to the child or others, if applicable. <p><u>Systemic Correction</u> The educational agency must submit evidence to the Department of written procedures and practices regarding the least restrictive environment placement decision process.</p> <p><u>Opportunities for Improvement</u> An internal monitoring and review system would be very helpful to promote compliance. There is an opportunity to improve upon the continuum of services offered at Wayne County Career Center.</p>	<p><input checked="" type="checkbox"/> Yes</p> <p>The educational agency needs to address this finding in a Corrective Action Plan.</p>
	Interviews	<p>During several interview sessions the staff stressed that the Wayne County Career Center is an inclusion-based school with no full-time resource room for those students coming from other districts whose educational needs do not fit an inclusion or self-contained environment.</p> <p>Placement starts with the least restrictive environment, even when students come from a more restrictive environment in another school. This needs to be reflected in the student records.</p>		
	Concerns Noted	<p>Many of the reviewed IEPs did not provide a justification statement as to why the student could not be served in the general education setting. This statement must be based upon individual student needs. This statement must also match the location listed in Section 7 of the IEP for specially designed instruction.</p>		



Additional Considerations and Opportunities for Improvement:

- Wayne County Career Center would benefit from developing a new teacher onboarding process geared toward any new staff member hired regarding their Special Education Policies, Procedures and Practices.
- Wayne County Career Center should highly consider developing and implementing a formal process of tracking specially designed instruction (SDI) to ensure Free Appropriate Public Education [OAC 3301-51-07 (K)].
- It is highly recommended that Wayne County Career Center provide paraprofessionals and Star monitors time to review student specific information before they begin working with a new student who has been assigned to them or their classroom. They also could benefit from training on how best to serve high need students.
- It is highly recommended the Wayne County Career Center consider developing and implementing a formal process of tracking the progress of the measurable goals. Progress on goals should be reported in alignment to the measurement used in the annual goal statement to ensure a Free Appropriate Public Education [OAC 3301-51-07 (K)].
- The continuum of alternative placements did not appear to be available across all grade levels and settings. Wayne County Career Center will need to revise and add to their continuum of alternative placements, under rule 3301-51-09 Delivery of Services (C), to ensure that a continuum of alternative placements is available to meet the needs of children with disabilities for special education and related services.
- Communication Plan: There is an opportunity for Wayne County Career Center to strengthen their communications with associate educational agencies focusing on the monitoring of student progress and needs. Progress monitoring, documentation and reporting are inconsistently implemented and deployed across all associate educational agencies and the career center. There is a need to develop and document specific practices and procedures for student progress monitoring, documentation, analysis, and reporting in relation to annual IEP goals, academic achievement, and functional performance [3301-51-07 (H) (1) (d), Individualized Education Program].