

**Zanesville City School District**  
**IRN: 045179**

**Ohio the Department of Education, Office for Exceptional Children**  
**2021 IDEA Monitoring Review Summary Report**

### **Introduction**

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

### **Definition of terms in this document:**

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

Systemic Corrections refers to non-compliance within the larger systems at work to implement IDEA within the educational agency. 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 review activities conducted by the Department during the week of September 27, 2021, as part of its general supervision requirements under the Individuals with Disabilities Education Act (IDEA).

During the 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.

Review activities 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 Provider and Administrator Interviews.

### **Data Sources**

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

1. Public Parent Meeting and Written Comments

Zanesville City School District mailed 829 Department approved letters to all families with students with disabilities in the educational agency. The Department 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 Department website.

On September 27, 2021, the Department consultants held a public meeting for parents and other interested parties. There were no parents or family members in attendance. Two State Support Team

(SST) Region 12 representatives attended the public meeting. The Department presented an overview of the monitoring process and provided contact information for parents to submit feedback and comments regarding the special education program at Zanesville City School District. The Department received comments from one parent.

During the presentation, parents were advised of the formal complaint process under IDEA and that their comments did not constitute a formal complaint. Parents 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.

## 2. Pre-Onsite Data Analysis

The Department conducted a comprehensive review which included district, building and grade level data; Special Education Performance 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 areas for growth and improvement and educational agency strengths.

## 3. Record Review/IEP Verification

Prior to the onsite visit, the Department consultants reviewed 32 records of school age students with disabilities. The Department consultants selected records of students with disabilities from a variety of disability categories and ages. Ten student records were selected for IEP verification in the classroom setting.

## 4. Staff/Administrative Interviews

On September 27 and 28, 2021, the Department consultants held 22 sessions of interviews with 23 administrators and 84 teachers, school counselors, related services personnel, school psychologists, and paraprofessionals. The Department interviews focused on the following review areas: Child Find; Delivery of Services; Least Restrictive Environment (LRE) and IEP alignment and Discipline.

### **Strengths/Commendations:**

During our time reviewing Zanesville City Schools, we witnessed high-quality instruction, positive culture among staff members and genuine care for the students from staff and administrators. The staff spoke very highly of one another and of administrators. They are supportive of one another, communicate and work well together. Through their hard work, they have created a community of support throughout the buildings where everyone goes above and beyond to best serve the students. Their culture of positivity trickles down to students, who have a sense of self-pride and enjoy being in the buildings. OEC was impressed by staff longevity, commitment, passion for teaching and desire for learning and professional development.

### **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. 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 [Raymond.McCain@education.ohio.gov](mailto:Raymond.McCain@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: February 7, 2022**

## Department Trainings

As part of the Department monitoring process, Zanesville City School District personnel, as identified by the Department, are required to complete the Special Education Essentials 2019-2020 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 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: February 7, 2022**

## Individual Correction

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

**Individual Correction Due Date: March 23, 2022**

## 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: September 14, 2022**

Once the educational agency has completed all action plan activities, the educational agency will use the Department's monitoring process to conduct a self-review to identify continued areas of improvement with assistance from the Department and SST.

For questions regarding the review, please contact: Raymond McCain, the Department's IDEA Monitoring Contact, at (877) 644-6338, or by e-mail at [Raymond.McCain@education.ohio.gov](mailto:Raymond.McCain@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	Record Review	<p><b>34 CFR 300.305(a) [Review of Existing evaluation data] and OAC 3301-51-11 (c)(1)(a) [Preschool children eligible for special education]</b></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
	Interviews/Public Comments			
	Concerns Noted			
CF-2	Record Review	<p><b>OAC 3301-51-06 [Evaluations]</b></p> <p>Twenty-seven (27) out of 32 evaluations, or 84%, 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> <p><u>Opportunities for Improvement</u> It is recommended that Zanesville City Schools develop a procedure of checks and balances to ensure research-based interventions that are being provided to students are correctly documented within the ETR as well as in Part 2s Summary of Interventions.</p>	<input checked="" type="checkbox"/> Yes The educational agency needs to address this finding in a Corrective Action Plan.
	Interviews/Public Comments			
	Concerns Noted			

Record Review Item	Evidence of Findings		Evidence of Corrections/Recommendations	Must be addressed in CAP
CF-3	Record Review	<p><b>34 CFR 300.501(b) [Parent participation in meetings] and OAC 3301-51-06 (E)(2)(a) [Evaluation procedures].</b></p> <p>Eighteen (18) out of 32 student records, or 56%, did not show evidence that the parent was afforded the opportunity to participate in the evaluation team planning meeting.</p>	<p><u>Individual Correction</u></p> <p>The educational agency must provide evidence that the parent was involved or provided the opportunity to participate in the evaluation planning process.</p> <p>The evidence may include evaluation planning form, prior written notice, parent invitation, referral form or communication log.</p>	<p><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>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>	
	Concerns Noted	<p>A majority of the planning forms provided only had the signature of the School Psychologist which brought up the question whether other members of the planning team were active participants during the planning meeting. Zanesville failed to provide any evidence or documentation through a PR-02, PR-01 and/or OP-09 that other members of the planning team were invited to or participated in these planning meetings.</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><u>Opportunities for Improvement</u></p> <p>It is strongly recommended that Zanesville City Schools develop an internal monitoring process which contains procedures to ensure:</p> <ul style="list-style-type: none"> <li>• Active team participation in the ETR planning process; and</li> <li>• Appropriate evaluation data are available.</li> </ul> <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>	

Record Review Item	Evidence of Findings		Evidence of Corrections/Recommendations	Must be addressed in CAP
CF-4	Record Review	<p><b>34 CFR 300.300 [Parental Consent]</b> Eight out of 24 applicable student records reviewed, or 33%, did not provide evidence of parental consent obtained prior to new testing.</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			
	Concerns Noted		<p>The evidence may include, prior written notice, parent invitation, communication log, or other documented attempts to obtain parental informed, written consent.</p> <p>If the educational agency cannot provide documentation that the parent provided informed, written consent for evaluation, or did not respond to repeated attempts to obtain consent, the agency must conduct a reevaluation including documentation of parental consent.</p> <p><u>Systemic Correction</u> The educational agency must submit evidence to the Department of written procedures and practices for obtaining parental consent obtained prior to new testing or policies and practices for moving forward when parents will not participate.</p> <p><u>Opportunities for Improvement</u> There is also an opportunity for the district to implement procedures for confirmation of parental involvement in remote meetings.</p> <p>OAC 3301-51-05(C)(4) addresses parental consent in writing as required “if the school district can demonstrate that it made reasonable efforts to obtain such consent; and the child’s parent has failed to respond.” If the LEA was able to receive verbal consent, then the parent did not fail to respond.</p>	

Record Review Item	Evidence of Findings		Evidence of Corrections/Recommendations	Must be addressed in CAP
CF-5	Record Review	<p><b>34 CFR 300.304(c)(4) [Other evaluation procedures]</b>  <b>OAC 3301-51-01 [Applicability of requirements and definitions] and 3301-51-06 (E)(2)(a) [Evaluation procedures]</b></p> <p>Thirty (30) out of 32 evaluations, or 94%, 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>	<input checked="" type="checkbox"/> Yes <p>The educational agency needs to address this finding in a Corrective Action Plan.</p>
	Interviews/Public Comments	<p>Due to the shortage of School Psychologists and the lack of support provided by other staff members, fewer assessments were selected as well as completed to contain all the needed information. Meeting the necessary timeframes associated with ETRs, staff did what was necessary, therefore, the quality of the Part 1's suffered.</p> <p>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>Opportunities for Improvement</u></p> <p>It is strongly recommended that Zanesville City Schools develop an internal monitoring process which contains procedures to ensure:</p> <ul style="list-style-type: none"> <li>• Active team participation in the ETR planning process.</li> <li>• Appropriate evaluation data is available; and</li> <li>• Assessments identified on the Planning form are being completed and represented in a Part 1.</li> </ul> <p>Professional development should be provided to all identified staff members regarding participation and completion of required ETR forms thus allowing them to be an active member in the development of ETR.</p>	
	Concerns Noted	<p>In several cases, assessments included on the planning form were not presented in Part 1 of the ETR, and, in other cases, assessments were reported in Part 1 that were not included on the planning form. All assessments and data listed for evaluation on the ETR planning form, and agreed upon by the parent, must appear – in some form – in a Part 1 individual evaluator's assessment.</p>		

Record Review Item	Evidence of Findings		Evidence of Corrections/Recommendations	Must be addressed in CAP
CF-6	Record Review	<p><b>34 CFR 300.306(c) [Procedures for determining eligibility and educational need]</b></p> <p>Thirty-one (31) out of 32 evaluations, or 97%, did not show evidence of clearly stating the summary of assessment results.</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><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><u>Systemic Correction</u></p>	
	Concerns Noted	<p>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>Sometimes information was included within a Part 2 that was not indicated or identified on the planning form or on a Part 1 such as information provided by parent, background history, medical history and/or observation. Question arose to where this information actually came from.</p>	<p>The educational agency must submit evidence to the Department of written procedures and practices regarding summary of data and assessment results.</p> <p><u>Opportunities for Improvement</u></p> <p>It is strongly recommended that Zanesville City Schools develop an internal monitoring process which contains procedures to ensure:</p> <ul style="list-style-type: none"> <li>• Active team participation in the ETR process</li> <li>• Assessments identified on the Planning form are being completed and represented in a Part 1 and are summarized within the Part 2.</li> </ul> <p>Professional development should be provided to all identified staff members regarding participation and completion of required ETR forms thus allowing them to be an active member in the development of ETR.</p>	
CF-7	Record Review	<p><b>34 CFR 300.306(c) [Procedures for determining eligibility and educational need]</b></p> <p>Thirty (30) out of 32 evaluation team reports, or 94%, did not contain a clear and succinct description of educational needs.</p>	<p><u>Individual Correction</u></p> <p>The educational agency will reconvene the ETR teams to conduct a reevaluation and provide a clear and succinct description of the student's educational needs. The IEP team must consider the results of this reevaluation.</p>	<p><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><u>Systemic Correction</u></p>	
	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.</p>	<p>The educational agency must submit evidence to the Department of written procedures and practices regarding description of educational needs.</p>	

Record Review Item	Evidence of Findings		Evidence of Corrections/Recommendations	Must be addressed in CAP
CF-8	Record Review	<p><b>34 CFR 300.306(c) [Procedures for determining eligibility and educational need]</b></p> <p>Twenty-nine (29) out of 32 evaluation team reports, or 91%, did not contain specific implications for instruction.</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>	<input checked="" type="checkbox"/> Yes <p>The educational agency needs to address this finding in a Corrective Action Plan.</p>
	Interviews/Public Comments		<p><u>Systemic Correction</u></p> <p>The educational agency must submit evidence to the Department of written procedures and practices regarding implications for instruction.</p>	
	Concerns Noted	<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 in the Part 2 summary.</p>		
CF-9	Record Review	<p><b>34 CFR 300.306(a)(1) [Determination of eligibility]</b>  <b>OAC 3301-51-01 (B)(21) [Applicability of requirements and definitions]</b></p> <p>Seventeen (17) out of 32 evaluations, or 53%, 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>	<input checked="" type="checkbox"/> Yes <p>The educational agency needs to address this finding in a Corrective Action Plan.</p>
	Interviews/Public Comments		<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>	
	Concerns Noted		<p><u>Opportunities for Improvement</u></p> <p>The district should address the issue of documenting parent involvement in the ETR process and strengthening the structure of ETR meetings to ensure that all required team members are present and sign the ETR document or verify remote involvement.</p>	

Record Review Item	Evidence of Findings		Evidence of Corrections/Recommendations	Must be addressed in CAP
CF-10	Record Review	<p><b><i>OAC 3301-51-01 (B)(10) [Definitions] and 3301-51-06 [Evaluations]</i></b>            Twenty-seven (27) out of 32 evaluations, or 84%, did not provide a justification for the eligibility determination decision.</p>	<p><u>Individual Correction</u>            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>            The educational agency must submit evidence to the Department of written procedures and practices regarding the eligibility determination decision.</p>	<p><input checked="" type="checkbox"/> Yes            The educational agency needs to address this finding in a Corrective Action Plan.</p>
	Interviews/Public Comments			
	Concerns Noted	<p>The evaluation determination must justify the eligibility by summarizing evidence beyond repeating the definition of the disability.</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><b>SPP Indicator 13</b>  <b>34 CFR 300.320(b) [Transition services]</b>  <b>OAC 3301-51-07 (H)(2) [Definition of individualized education program]</b></p> <p>Six out of eight applicable IEPs reviewed, or 75%, 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"> <li>1. There are appropriate measurable postsecondary goal(s).</li> <li>2. The postsecondary goals are updated annually.</li> <li>3. The postsecondary goals were based on Age-Appropriate Transition Assessment (AATA).</li> <li>4. There are transition services that will reasonably enable the student to meet the postsecondary goal(s).</li> <li>5. The transition services include courses of study that will reasonably enable the student to meet the postsecondary goal(s).</li> <li>6. The annual goal(s) are related to the student's transition service needs.</li> <li>7. There is evidence the student was invited to the IEP Team Meeting where transition services were discussed.</li> <li>8. When appropriate, there is evidence that a representative of any participating agency was invited to the IEP Team Meeting.</li> </ol>	<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 an opportunity for Zanesville 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> <p>It is recommended training 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>
	Interviews/Public Comments			

Record Review Item	Evidence of Findings		Evidence of Correction/Recommendations	Must be addressed in CAP
	<b>Concerns Noted</b>	<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, Interests, Needs and Strengths (PINS) that were gathered from appropriate AATAs. However, they appeared to be the same for all three postsecondary goals.</p>		
<b>DS-2</b>	<b>Record Review</b>	<p><b>34 CFR 300.320(a)(1) [Definition of individualized education program]</b></p> <p>Twenty-four (24) out of 32 IEPs, or 75%, did not contain Present Levels of Academic Achievement and Functional Performance (PLOP) that addressed the needs of the student.</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"> <li>• 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;</li> <li>• PLOP must relate to the goal measurement</li> <li>• Baseline data provided for developing a measurable goal.</li> </ul> <p><u>Systemic Correction</u></p> <p>The educational agency must submit evidence to the Department of written procedures and practices regarding the review of current academic/functional data when writing IEPs.</p> <p><u>Opportunities for Improvement</u></p> <p>An internal monitoring and review system would be very helpful to promote compliance in present levels of performance.</p>	<input checked="" type="checkbox"/> Yes <p>The educational agency needs to address this finding in a Corrective Action Plan.</p>
	<b>Interviews/Public Comments</b>			
	<b>Concerns Noted</b>	<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.</p>		

Record Review Item	Evidence of Findings		Evidence of Correction/Recommendations	Must be addressed in CAP
			Additional training and or professional development should be provided to assist staff members on how to compliantly develop Present Levels of Performance.	
DS-3	Record Review	<p><b>34 CFR 300.320(a)(2)(i) [Definition of individualized education program]</b></p> <p>Nineteen (19) out of 32 IEPs, or 59%, did not contain measurable 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 annual goals to contain the following critical elements:</p> <ol style="list-style-type: none"> <li>1. Clearly <u>defined behavior</u>: the specific action the child will be expected to perform.</li> <li>2. The <u>condition</u> (situation, setting or given material) under which the behavior is to be performed.</li> <li>3. <u>Performance criteria</u> desired: the level the child must demonstrate for mastery <b>and</b> the number of times the child must demonstrate the skill or behavior.</li> </ol> <p><u>Systemic Correction</u></p> <p>The educational agency must submit evidence to the Department of written procedures and practices regarding the development of measurable annual IEP goals.</p> <p><u>Opportunities for Improvement</u></p> <p>An internal monitoring and review system would be very helpful to promote compliance in annual IEP goals.</p> <p>Additional training and technical assistance for annual IEP goal development are recommended. Focus should be given to a goal statement that is measurable, with the same measurement in the present levels, and can be reported in progress monitoring in the same way.</p>	<input checked="" type="checkbox"/> Yes The educational agency needs to address this finding in a Corrective Action Plan.
	Interviews/Public Comments	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.		
	Concerns Noted	Measurable goals in the IEPs reviewed were inconsistent in quality and content. Often one or more required elements were missing.		

Record Review Item	Evidence of Findings		Evidence of Correction/Recommendations	Must be addressed in CAP
DS-4	Record Review	<p><b>34 CFR 300.320(a)(2)(i) [Definition of individualized education program]</b></p> <p>Thirteen (13) out of 32 IEPs, or 41%, 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 the Department of written procedures and practices regarding the IEP process of addressing identified academic needs.</p> <p><u>Opportunities for Improvement</u></p> <p>It is strongly recommended that the district consider providing additional training and technical assistance for ensuring all academic needs addressed within the ETR are brought over to the IEP as either a goal or addressed within the Profile is recommended.</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			
	Concerns Noted	<p>If academic 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>		
DS-5	Record Review	<p><b>34 CFR 300.320(a)(2)(i) [Definition of individualized education]</b></p> <p>Ten out of 23 applicable IEPs reviewed, or 43%, did not contain annual goals that address the child’s functional area(s) of need.</p>	<p><u>Individual Correction</u></p> <p>The educational agency must reconvene the teams of the IEPs identified as noncompliant to review and amend the IEP. Annual goals must address the functional needs of the child unless the team provides evidence that the goals were prioritized based on the severity of the needs of the child.</p> <p><u>Systemic Correction</u></p> <p>The educational agency must submit evidence to the Department of written procedures and practices regarding the IEP process of addressing identified functional needs.</p> <p><u>Opportunities for Improvement</u></p> <p>It is strongly recommended that the district consider providing additional training and technical assistance for ensuring all functional needs addressed within the ETR are brought over to the IEP as either a goal or addressed within the Profile is recommended.</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			
	Concerns Noted	<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>		

Record Review Item	Evidence of Findings		Evidence of Correction/Recommendations	Must be addressed in CAP
DS-6	Record Review	<p><b>34 CFR 300.320(a)(4) [Definition of individualized education program]</b>  <b>OAC 3301-51-07 (H)(1)(e)(i) [Definition of IEP]</b></p> <p>Eighteen (18) out of 32 IEPs, or 56%, did not contain a statement of Specially Designed Instruction (SDI) including related services that addresses the individual needs of the child and supports the annual goals.</p>	<p><u>Individual Correction</u>  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>  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>  It is strongly recommended that the district consider additional training and technical assistance focused on individualizing Specially Designed Instruction that reflect the specific academic or functional needs described in the corresponding present levels and goals.</p>	<input checked="" type="checkbox"/> Yes The educational agency needs to address this finding in a Corrective Action Plan.
	Interviews/Public Comments			
	Concerns Noted	<p>At times, SDI lacked the specificity required to address individual needs(s) described in the present levels and goal statements.</p>		
DS-7	Record Review	<p><b>34 CFR 300.320(a)(7) [Definition of individualized education program]</b>  <b>OAC 3301-51-07 (H)(1)(i) [Definition of IEP]</b></p> <p>Eight out of 32 IEPs, or 25%, did not indicate the specific location where the specially designed instruction will be provided.</p>	<p><u>Individual Correction</u>  The educational agency must reconvene the teams of the IEPs identified as noncompliant to review and amend the location where the specially designed instruction will be provided.</p> <p><u>Systemic Correction</u>  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>	<input checked="" type="checkbox"/> No The educational agency does not need to address this finding in a Corrective Action Plan.
	Interviews/Public Comments			
	Concerns Noted			

Record Review Item	Evidence of Findings		Evidence of Correction/Recommendations	Must be addressed in CAP
DS-8	Record Review	<p><b>34 CFR 300.320(a)(7) [Definition of individualized education program]</b>  <b>OAC 3301-51-07 (H)(1)(i) [Definition of IEP]</b></p> <p>Five out of 32 IEPs, or 16%, did not indicate the amount of time and frequency of the 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 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><input checked="" type="checkbox"/> No</p> <p>The educational agency does not need to address this finding in a Corrective Action Plan.</p>
	Interviews/Public Comments			
	Concerns Noted			
DS-9	Record Review	<p><b>34 CFR 300.324(a)(2)(v) [Development of IEP]</b>  <b>OAC 3301-51-01(B)(3) [Applicability of requirements and definitions]</b></p> <p>Five out of seven applicable IEPs reviewed, or 71%, 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></p> <p>The educational agency must reconvene the teams of the IEPs identified as noncompliant to review assistive technology and/or services that would directly assist the child with a disability to increase, maintain, or improve their functional capabilities and include them on the IEP.</p> <p><u>Systemic Correction</u></p> <p>The educational agency must submit evidence to the Department of written procedures and practices regarding assistive technology.</p>	<p><input checked="" type="checkbox"/> Yes</p> <p>The educational agency needs to address this finding in a Corrective Action Plan.</p>
	Interviews/Public Comments			
	Concerns Noted	<p>Assistive technology mentioned in the ETR as a need or mentioned within measurable goals must be identified in Section 7 under Assistive Technology. Phrases like “as needed,” “may need” and “at teacher’s discretion” are not acceptable in describing assistive technology.</p>		

Record Review Item	Evidence of Findings		Evidence of Correction/Recommendations	Must be addressed in CAP
DS-10	Record Review	<p><b>34 CFR 300.320(a)(6)(i) [Definition of individualized education]</b>  <b>OAC 3301-51-07 (H)(1)(g) [Definition of IEP]</b></p> <p>Twenty-nine (29) out of 32 IEPs, or 91%, 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></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 the Department of written procedures and practices regarding accommodations.</p> <p><u>Opportunities for Improvement</u></p> <p>Training from SSTs as well as an internal monitoring review system would be very helpful to promote compliance in the areas of accommodations.</p> <p>Providing Professional Development by the SST in the areas of Modifications versus Accommodations would greatly benefit all Zanesville City School District staff members.</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 during interview sessions they really had a hard time distinguishing between the differences between accommodations and modifications and when and how to implement them.</p>		
	Concerns Noted	<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>		
DS-11	Record Review	<p><b>34 CFR 300.320(a)(4) [Definition of individualized education program]</b>  <b>OAC 3301-51-07 (H)(1)(e) [Definition of IEP]</b></p> <p>One out of seven applicable IEPs reviewed, or 14%, 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></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 the Department of written procedures and practices regarding modifications.</p>	<p><input checked="" type="checkbox"/> No</p> <p>The educational agency does not need to address this finding in a Corrective Action Plan.</p>
	Interviews/Public Comments			
	Concerns Noted			

Record Review Item	Evidence of Findings		Evidence of Correction/Recommendations	Must be addressed in CAP
DS-12	Record Review	<p><b>34 CFR 300.320(a)(4) [Definition of individualized education program]</b>  <b>OAC 3301-51-07 (H)(1)(e) [Definition of IEP]</b>            All applicable IEPs reviewed identified 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> NA <u>Systemic Correction</u> NA</p>	<input checked="" type="checkbox"/> NA
	Interviews/Public Comments			
	Concerns Noted			
DS-13	Record Review	<p><b>OAC 3301-51-07 (H)(1)(h)(ii) [Definition of IEP]</b>            All applicable student records reviewed 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> NA <u>Systemic Correction</u> NA</p>	<input checked="" type="checkbox"/> NA
	Interviews/Public Comments			
	Concerns Noted			
DS-14	Record Review	<p><b>OAC 3301-51-07(L)(2) [Development, review and revision of IEP]</b>            Twelve (12) out of 32 student records, or 38%, did not show evidence of progress reporting data collected and analyzed to monitor performance on each goal.</p>	<p><u>Individual Correction</u> None <u>Systemic Correction</u> 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>	<input checked="" type="checkbox"/> Yes The educational agency needs to address this finding in a Corrective Action Plan.
	Interviews/Public Comments			
	Concerns Noted	<p>Even though progress data 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>		

Record Review Item	Evidence of Findings		Evidence of Correction/Recommendations	Must be addressed in CAP
DS-15	Record Review	<p><b><i>OAC 3301-51-07(L) [Development, review and revision of IEP]</i></b></p> <p>Eight out of 15 applicable IEPs reviewed, or 53%, 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>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> <p>Creating a district process for adopting ETRs and IEPs from other districts and other states would provide Zanesville with a procedure ensuring that services indicated on those adopted IEPs are being considered, provided or amended, thus avoiding any possible FAPE violations.</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			
	Concerns Noted	<p>When an ETR is completed before an IEP expires, the IEP team will need to review the current IEP to ensure it still meets all the needs addressed within that new ETR. This can be done with a statement in the profile section of the IEP, or the IEP can be amended to reflect any new changes.</p>		
DS-16	Record Review	<p><b><i>34 CFR 300.321(5) [IEP team]</i></b>  <b><i>OAC 3301-51-07(I) [IEP team]</i></b></p> <p>Eight out of 32 IEPs, or 25%, 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"> <li>• 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, <b>and</b></li> <li>• 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, <b>or</b></li> <li>• Reconvene the IEP team to review the IEP with all required members present.</li> </ul> <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 not need to address this finding in a Corrective Action Plan.</p>
	Interviews/Public Comments			
	Concerns Noted	<p>Several IEPs had statements, “Parent agreed via a phone or video conference” but did not provide any evidence of such parent participation. Districts must provide evidence of this type of participation using a PR-01, OP-09 as well as later obtaining/receiving the actual signatures. This can be carried out by emails, texts, photos and/or mailing of signature pages.</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><b>34 CFR 300.114 [LRE requirements] and 300.320(a)(5) [Definition of individualized education program]</b>  <b>OAC 3301-51-07 (H)(1)(f) [Definition of individualized education program]</b></p> <p>Thirteen (13) out of 31 applicable IEPs reviewed, or 42%, 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></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"> <li>• Be based on the needs of the child, not the disability.</li> <li>• Reflect that the team has given adequate consideration to meeting the student's needs in the general classroom with supplementary aids and services.</li> <li>• 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.</li> <li>• Describe potential harmful effects to the child or others, if applicable.</li> </ul> <p><u>Systemic Correction</u></p> <p>The educational agency must submit evidence to the Department of written procedures and practices regarding the least restrictive environment placement decision process.</p> <p><u>Opportunities for Improvement</u></p> <p>Training from SSTs as well as an internal monitoring review system would be very helpful to promote compliance in the areas of Least Restrictive Environment.</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 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 of a common planning time to be successful.</p>		
	Concerns Noted	<p>Some of the LRE statements were either too generic, referred to the disability as a justification or were absent all together.</p>		

### **Additional Considerations and Opportunities for Improvement:**

- Based upon interviews and discussions with staff members, Zanesville City School District needs to redefine/refresh their Response to Intervention/Multi-Tiered System of Support (RTI/MTSS) process so that every district and contractual 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 interventions and data collection information is available for them to use. If a formal document delineating processes and procedures for RTI/MTSS does not exist, the district will need to create one for staff members to refer to after training. Also, Zanesville City School District needs to research and select researched-based interventions along with decision rules for all tiered interventions including academic and behavior concerns.
- There was an observed need to develop a formal process of adopting special education records from out of district, state, or/country [OAC 3301-51-07 (K)(5)(a)(b) and 3301-51-07 (K)(6)(a)(b)].
- Zanesville City School District 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)].