

Millennium Community School
IRN: 133561

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

Introduction

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

Definition of terms in this document:

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

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

Overview

The following report is a summary of the onsite review conducted by the Department on October 16 and 17, 2023, as part of its general supervision requirements under the Individuals with Disabilities Education Act (IDEA).

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

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

Onsite reviews are targeted to include the following specific areas:

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

Data Sources

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

1. Parent Input

Millennium Community School mailed 199 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 did not receive any comments from parents.

2. Pre-Onsite Data Analysis

The Department conducted a comprehensive review which included building and grade level data; Special Education Profile; Ohio School Report Cards; Comprehensive Continuous Improvement Plan (CCIP) and/or One Plan; 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 eight records of school-age students with disabilities. The Department consultants selected records of students with disabilities from a variety of disability categories and ages. Six student records were selected for IEP verification in the classroom setting. During the IEP verifications, OEC staff noted that students were very engaged in their learning and that staff had developed a good rapport with their students. It was also noted that teachers were very knowledgeable of the students' goals and other needs outlined in their IEPs.

4. Staff/Administrative Interviews

On October 17th and 18th, 2023, the Department consultants held six sessions of interviews with five administrators and 17 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:

Millennium Community School staff has laid the foundation for setting high expectations for all students to thrive no matter their age or grade level. Their dedication to student achievement will allow the district to be successful with their implementation of OEC's Monitoring Process and recommendations.

Millennium staff are extremely passionate, caring and dedicated not only to students with disabilities, but the entire student body.

Several interviewees noted the binders that they are given in regard to student's IEP goals, accommodations, and other needs.

Staff conveyed during interviews that they were appreciative of the extra support of the Academic Architects, who frequently visit the classrooms.

Through interviews, it was noted that the administration is very responsive, and that staff feel supported. Interviewees noted that they "love the extra planning time built in this year."

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.

Free Appropriate Public Education (FAPE)

After the onsite review, a letter was emailed to Millennium Community School dated January 5, 2023, indicating a finding of a FAPE violation in the area of delivery of services. The letter indicated required actions of the school to address this violation. This area of noncompliance related to FAPE as well as additional areas of IDEA Part B implementation are noted here:

Requirement:

- O.A.C 3301-51-09 [Delivery of Services]
- OAC 3301-51-02 (A) [Free appropriate public education]

Findings:

- Interviews conducted during the onsite review revealed that the school has been hiring long-term substitutes in the role of intervention specialists. The review indicated that the teacher is not substituting for another intervention specialist but is the teacher of record for the students reviewed by the Department. Because the teacher is not a licensed intervention specialist, the students assigned to this teacher have not been receiving adequate special education services and FAPE in accordance with their IEPs.

Individual Corrections:

- Millennium will provide the following by **January 19, 2024**:
 - Evidence that records for the students, identified in the January 5, 2024 letter, have been reviewed and corrected to reflect that services will be provided by a licensed intervention specialist.
 - Evidence that the students, identified in the January 5, 2024 letter, made adequate progress towards annual goals during the timeframe that the unlicensed teacher was listed as the intervention specialist.
- If adequate progress was not made, the IEP team will determine any applicable amount, content and delivery method of compensatory education to be provided to the identified students to ensure delivery of the adequate special education services not received during the 2023-2024 school year. Millennium Community School will provide documentation (through the use of the “Compensatory Education Decision Flow Chart” and PR-01) of the compensatory education decisions to the Department no later than **February 2, 2024**.
- It is also recommended that Millennium Community School review the ETRs and IEPs of all active students who were enrolled at the time of the identified FAPE violation (services provided during the 2023-2024 school year) to determine if all of those served by the unlicensed teacher made adequate progress toward annual goals.

Systemic Correction:

- Millennium Community School will develop written Special Education Policies and Procedures for ensuring that FAPE is being delivered by the appropriate licensed professional. These written policies and procedures must be adopted by Millennium’s Board. The school will provide training and technical support to all hired and contractual staff for the adopted policies and procedures. A system will be developed to ensure that ongoing training and support is available for new hires after initial training.

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 State Support Team (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 Heather.Malone@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 29, 2024

Department Trainings

As part of the Department monitoring process, Millennium 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: **February 29, 2024**

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: **April 23, 2024**

CAP Activities and Systemic Correction

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

Completion of CAP Activities and Systemic Correction Due Date: **November 6, 2024**

Once the educational agency has completed all action plan activities, the educational agency will plan for continuous improvement through the One Needs Assessment and One Plan with Department and SST assistance.

For questions regarding the review, please contact: Heather Malone, the Department's IDEA Monitoring Contact, at 614-935-3105, toll-free at (877) 644-6338, or by e-mail at heather.malone@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>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>	<p><input checked="" type="checkbox"/> NA</p>
CF-2	<p>OAC 3301-51-06 [Evaluations]</p> <p>Seven out of eight, or 88%, evaluations reviewed did not appropriately document interventions provided to resolve concerns for the child performing below grade-level standards.</p> <p><u>Interviews</u></p> <p>Through interviews, it appears that teachers and other staff collect intervention data; however, it did not appear that there was a formal multi-tiered system of supports (MTSS) process of initiating interventions and making referrals for evaluation that is communicated to all staff members.</p> <p><u>Concerns Noted</u></p> <p>Although interventions are provided through various processes across the school, the results are not uniformly documented in ETRs. Frequently, the school's initial ETRs did not contain a summary of interventions implemented to include description, intensity, time, and results. For reevaluations, if no additional interventions were provided, simply noting that the team agreed the current IEP supports and services are suitable to meet the student's needs will suffice.</p>	<p><u>Individual Correction</u></p> <p>The Department has verified that these students have a current ETR in place, so no additional individual correction is required.</p> <p><u>Systemic Correction</u></p> <p>The educational agency must submit evidence to the Department of written procedures and practices regarding documentation of intervention and supports provided prior to completion of the initial and reevaluation team report. The Department will verify 100% compliance in this area through a review of new records that have been written after all trainings have been completed.</p> <p><u>Opportunities for Improvement</u></p> <p>Millennium Community School would benefit from creating and implementing a school wide MTSS process. All members of Millennium Community School need to be trained on the correct implementation of this MTSS process along with monitoring from administration to provide any additional technical assistance needed.</p>	<p><input checked="" type="checkbox"/> Yes</p> <p>This finding needs to be addressed in a Corrective Action Plan.</p>

Record Review Item	Evidence of Findings	Evidence of Corrections/Recommendations	Must be Addressed in CAP
CF-3	<p>34 CFR 300.501(b) [Parent participation in meetings] and OAC 3301-51-06 (E)(2)(a) [Evaluation procedures].</p> <p>All student records reviewed showed evidence that the parent was afforded the opportunity to participate in the evaluation team planning meeting.</p>	<p><u>Individual Correction</u> NA</p> <p><u>Systemic Correction</u> NA</p>	<input checked="" type="checkbox"/> NA
CF-4	<p>34 CFR 300.300 [Parental Consent]</p> <p>One out of eight, or 13%, student records reviewed did not provide evidence of parental consent obtained prior to evaluation.</p> <p><u>Interviews</u></p> <p>It was noted during interviews that staff attempts to get parent signatures in multiple ways (e.g., send paperwork home, go to car rider line, etc.)</p> <p><u>Concerns Noted</u></p> <p>Some of the reviewed records contained typed in signatures on the consent form. This was identified as a vendor issue during interviews and has now been remedied.</p>	<p><u>Individual Correction</u></p> <p>The educational agency must provide evidence that the parent provided informed, written consent for evaluation, based upon the planning form. Or the agency must show documented repeated attempts to obtain informed, written consent to which the parent did not respond.</p> <p>The evidence may include prior written notice, parent invitation, communication log, or other documented attempts to obtain parental informed, written consent.</p> <p>If the educational agency cannot provide documentation that the parent provided informed, written consent for evaluation, or did not respond to repeated attempts to obtain consent, the agency must conduct a reevaluation including documentation of parental consent.</p> <p><u>Systemic Correction</u></p> <p>It is recommended that the educational agency review and revise its written procedures and practices for obtaining informed parental consent. The Department will verify 100% compliance in this area through a review of new records that have been written after all trainings have been completed.</p> <p><u>Opportunities for Improvement</u></p> <p>There is an opportunity for the district to strengthen the policies and practices on obtaining written, informed consent for evaluations.</p>	<input checked="" type="checkbox"/> No This finding does <u>not</u> need to be addressed in a Corrective Action Plan.

Record Review Item	Evidence of Findings	Evidence of Corrections/Recommendations	Must be Addressed in CAP
CF-5	<p>34 CFR 300.304(c)(4) [Other evaluation procedures] OAC 3301-51-01 [Applicability of requirements and definitions] and 3301-51-06 (E)(2)(a) [Evaluation procedures]</p> <p>Eight out of eight, or 100%, evaluations reviewed did not provide evidence that the evaluation addresses all areas related to the suspected disability.</p> <p><u>Interviews</u></p> <p>Through interviews, staff shared that the ETR process is moving towards a “team approach” (i.e., school psychologists lead the process, but “everyone” is responsible for their assigned individual evaluations (Part 1s) to include conducting the Team Summary (Part 2). Some staff stated that they are not always asked for input during the evaluation process.</p> <p><u>Concerns Noted</u></p> <p>Some interviewees stated that the school psychologist fills out the planning form and staff simply receive an email requesting the needed information.</p> <p>Observations are required for all initial and reevaluations. The public agency must ensure that the child is observed in the child’s learning environment including the general classroom setting to document the child’s academic performance and behavior in the area of difficulty (300.310).</p>	<p><u>Individual Correction</u></p> <p>The educational agency will convene the ETR teams to conduct a reevaluation and provide evidence that the evaluation addresses all areas related to the suspected disability.</p> <p><u>Systemic Correction</u></p> <p>The educational agency must submit evidence to the Department of written procedures and practices to provide evidence that the evaluation addresses all areas related to the suspected disability. The Department will verify 100% compliance in this area through a review of new records that have been written after all trainings have been completed.</p> <p>Millennium Community School 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. • All ETRs contain observations conducted in the student’s learning environment including the general classroom setting to document the child’s academic performance and behavior in the area of difficulty. <p><u>Opportunities for Improvement</u></p> <p>There is a need to refine the ETR planning and individual evaluator’s input process.</p> <p>The school should consider using the assessment title from the planning form when completing a Part 1.</p>	<p><input checked="" type="checkbox"/> Yes</p> <p>This finding needs to be addressed in a Corrective Action Plan.</p>

Record Review Item	Evidence of Findings	Evidence of Corrections/Recommendations	Must be Addressed in CAP
CF-6	<p>34 CFR 300.306(c) [Procedures for determining eligibility and educational need] Five out of eight, or 63%, evaluations reviewed did not show evidence of clearly stating the summary of assessment results.</p> <p>Interviews Interviewees indicated a lack of consistency in getting quality information. They would like more training.</p> <p>Concerns Noted Record reviews revealed that the information in the Part 2 often did not contain information from all of the Part 1s. In addition, it lacked information specific to the student that could be used to create meaningful academic and/or functional goals. The information in Part 2 of the ETR must be clear and concise and not be a copy and paste of information from Part 1. The language should be written in terms that the parents, as well as involved professionals, can understand and use to create goals and services in the IEP. All areas addressed in Part 1 must be summarized in Part 2. In multiple instances, all areas were not summarized and/or information was not included that could be used to create meaningful goals and services within the IEP.</p>	<p>Individual Correction 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>Systemic Correction The educational agency must submit evidence to the Department of written procedures and practices regarding summary of data and assessment results. The Department will verify 100% compliance in this area through a review of new records that have been written after all trainings have been completed.</p> <p>Opportunities for Improvement 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 ETRs.</p>	<p><input checked="" type="checkbox"/> Yes This finding needs to be addressed in a Corrective Action Plan.</p>
CF-7	<p>34 CFR 300.306(c) [Procedures for determining eligibility and educational need] Seven out of eight, or 88%, evaluation team reports reviewed did not contain a clear and succinct description of educational needs.</p> <p>Interviews Through interviews, it appeared that teachers have not had any professional development in writing Part 1s. They stated that it would be beneficial to have training regarding what specific information is needed.</p> <p>Concerns Noted Educational needs were sometimes generic in nature and did not address the child's individualized needs. In some records, needs were stated in Part 1 but were not included in the Part 2 summary.</p>	<p>Individual Correction 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>Systemic Correction The educational agency must submit evidence to the Department of written procedures and practices regarding description of educational needs. The Department will verify 100% compliance in this area through a review of new records that have been written after all trainings have been completed. Millennium Community School must develop an internal monitoring process which contains procedures to ensure:</p> <ul style="list-style-type: none"> The educational needs listed in all Part 1s are being carried over in Part 2 or if omitted in Part 2 there is an explanation as to why. <p>Opportunities for Improvement Providing professional development on how to write purposeful educational needs to all staff members, who might be requested to complete a Part 1, is recommended.</p>	<p><input checked="" type="checkbox"/> Yes This finding needs to be addressed in a Corrective Action Plan.</p>

Record Review Item	Evidence of Findings	Evidence of Corrections/Recommendations	Must be Addressed in CAP
CF-8	<p>34 CFR 300.306(c) [Procedures for determining eligibility and educational need] Seven out of eight, or 88%, evaluation team reports reviewed did not contain specific implications for instruction.</p> <p>Interviews Through interviews, it appeared that teachers have not had any professional development in writing Part 1s. They stated that it would be beneficial to have training regarding what specific information is needed.</p> <p>Concerns Noted In some records, implications for instruction were stated in Part 1 but were not included in the Part 2 summary. Implications for instruction often did not include what supports and services the student may benefit from in order to access the general curriculum.</p>	<p>Individual Correction 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>Systemic Correction The educational agency must submit evidence to the Department of written procedures and practices regarding implications for instruction. The Department will verify 100% compliance in this area through a review of new records that have been written after all trainings have been completed. Millennium Community School must develop an internal monitoring process which contains procedures to ensure:</p> <ul style="list-style-type: none"> The implications for instruction listed in all Part 1s are being carried over in Part 2 or if omitted in Part 2 there is an explanation as to why. <p>Opportunities for Improvement Providing professional development on how to write purposeful implications for instruction to all staff members, who might be requested to complete a Part 1, is recommended.</p>	<p><input checked="" type="checkbox"/> Yes This finding needs to be addressed in a Corrective Action Plan.</p>
CF-9	<p>34 CFR 300.306(a)(1) [Determination of eligibility] OAC 3301-51-01 (B)(21) [Applicability of requirements and definitions]</p> <p>One out of eight, or 13%, 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>Interviews Several staff members indicated they were not actively involved in some of the ETR meetings and that they had little say in the assessments or outcomes for their students. General education teachers were sometimes absent during the planning meeting and/or ETR meeting.</p> <p>Concerns Noted Inconsistencies were noted during interviews as to whether teachers regularly attend ETR and IEP meetings.</p>	<p>Individual Correction The educational agency must provide evidence that the ETR teams and other qualified professionals, as appropriate, participated in the determination of eligibility and educational needs. If not, the ETR team must reconvene and provide the Department with evidence of group participation.</p> <p>Systemic Correction It is recommended that the educational agency review and revise its written procedures and practices for obtaining informed parental consent. The Department will verify 100% compliance in this area through a review of new records that have been written after all trainings have been completed.</p> <p>Opportunities for Improvement It is recommended Millennium Community School develop a procedure of checks and balances to ensure all members of the Planning/ETR team are in attendance for the entire length of these meetings. Training is also recommended to provide the school with the knowledge of legal responsibilities regarding who is required to attend these meetings.</p>	<p><input checked="" type="checkbox"/> No This finding does <u>not</u> need to be addressed in a Corrective Action Plan.</p>

Record Review Item	Evidence of Findings	Evidence of Corrections/Recommendations	Must be Addressed in CAP
CF-10	<p><i>OAC 3301-51-01 (B)(10) [Definitions] and 3301-51-06 [Evaluations]</i></p> <p>Seven out of eight, or 88%, evaluations reviewed did not provide a justification for the eligibility determination decision.</p> <p><u>Interviews</u></p> <p>Staff indicated they could use additional training to understand how to write a compliant justification statement for the disability determination.</p> <p><u>Concerns Noted</u></p> <p>When reviewing records, it was noted that the justification often did not include how the student's disability affects the child's access to and progress in the general education curriculum.</p>	<p><u>Individual Correction</u></p> <p>The educational agency will reconvene the ETR teams to conduct a reevaluation and provide a clear justification for the eligibility determination.</p> <p><u>Systemic Correction</u></p> <p>The educational agency must submit evidence to the Department of written procedures and practices regarding the eligibility determination decision. The Department will verify 100% compliance in this area through a review of new records that have been written after all trainings have been completed.</p> <p><u>Opportunities for Improvement</u></p> <p>Millennium would benefit from professional development by 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>This finding needs to be addressed in a Corrective Action Plan.</p>

Component 2: Delivery of Services

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

Record Review Item	Evidence of Findings	Evidence of Correction/Recommendations	Must be Addressed in CAP
DS-1	<p>SPP Indicator 13 34 CFR 300.320(b) [Transition services] OAC 3301-51-07 (H)(2) [Definition of individualized education program] There were no IEPs with postsecondary transition plans.</p>	<p><u>Individual Correction</u> NA <u>Systemic Correction</u> NA</p>	<p><input checked="" type="checkbox"/> NA</p>
DS-2	<p>34 CFR 300.320(a)(1) [Definition of individualized education program] Seven out of eight, or 88%, IEPs reviewed did not contain Present Levels of Academic Achievement and Functional Performance (PLOP) that addressed the needs of the student.</p> <p><u>Interviews</u> Several staff members indicated they use common assessment data in order to create a current baseline for the PLOP. However, these data points are not specific to the deficits described in the goals.</p> <p><u>Concerns Noted</u> Most of the IEPs reviewed did not contain baseline data in the PLOP that aligned to the measurable goals. The PLOP must also include a comparison statement to grade-level expectations, which was missing in many of the IEPs reviewed.</p>	<p><u>Individual Correction</u> The educational agency must reconvene the IEP teams of the IEPs identified as noncompliant to review and amend the PLOP related to each goal to include the following information as it relates to each goal:</p> <ul style="list-style-type: none"> • Summary of current daily academic/behavior and/or functional performance compared to expected <u>grade-level</u> standards or to expected age-appropriate performance in order to provide a frame of reference for annual goal development in the specific area of academic and/or functional need; • Baseline data provided for developing a measurable goal (for example, ETR results, if current, formative academic assessments, curriculum-based measurements, transition assessments or functional behavior assessments); • Current performance measurement that <u>directly</u> relates to the goal measurement. <p><u>Systemic Correction</u> The educational agency must submit evidence to the Department of written procedures and practices regarding the review of current academic/functional data when writing IEPs. The Department will verify 100% compliance in this area through a review of new records that have been written after all trainings have been completed.</p> <p><u>Opportunities for Improvement</u> This 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.</p>	<p><input checked="" type="checkbox"/> Yes This finding needs to be addressed in a Corrective Action Plan.</p>

Record Review Item	Evidence of Findings	Evidence of Correction/Recommendations	Must be Addressed in CAP
DS-3	<p>34 CFR 300.320(a)(2)(i) [Definition of individualized education program]</p> <p>Six out of eight, or 75%, IEPs reviewed did not contain measurable annual goals.</p> <p><u>Interviews</u></p> <p>General education teachers would like to have more input in developing measurable annual goals for students within their classroom. With this in place, present levels of performance could be compliantly obtained from staff when they are requested.</p> <p><u>Concerns Noted</u></p> <p>In many instances, goals demanded multiple actions within a single goal. This does not allow for accurate measurement of a clearly defined behavior, which is necessary for clarity in defining criteria and mastery for a particular goal.</p>	<p><u>Individual Correction</u></p> <p>The educational agency must reconvene the teams of the IEPs identified as noncompliant to review and amend annual goals to contain the following critical elements:</p> <ol style="list-style-type: none"> 1. Clearly <u>defined behavior</u>: the specific action the child will be expected to perform. 2. The <u>condition</u> (situation, setting or given material) under which the behavior is to be performed. 3. <u>Performance criteria</u> desired: the level the child must demonstrate for mastery and the number of times the child must demonstrate the skill or behavior. <p><u>Systemic Correction</u></p> <p>The educational agency must submit evidence to the Department of written procedures and practices regarding the development of measurable annual IEP goals. The Department will verify 100% compliance in this area through a review of new records that have been written after all trainings have been completed.</p> <p><u>Opportunities for Improvement</u></p> <p>There is an opportunity for professional development and/or targeted technical assistance in developing appropriate and measurable goals that clearly address the needs of the student.</p>	<p><input checked="" type="checkbox"/> Yes</p> <p>This finding needs to be addressed in a Corrective Action Plan.</p>
DS-4	<p>34 CFR 300.320(a)(2)(i) [Definition of individualized education program]</p> <p>Three out of seven, or 43%, applicable IEPs reviewed did not contain annual goals that address the child's academic area(s) of need.</p> <p><u>Interviews</u></p> <p>Although most respondents indicated familiarity with identifying academic needs within the ETR, there is still a need for further training and technical assistance in this area.</p> <p><u>Concerns Noted</u></p> <p>Academic needs were mentioned in several ETRs as being an area of need but were not addressed in the IEP or were not noted as not a priority at this time.</p>	<p><u>Individual Correction</u></p> <p>The educational agency must reconvene the teams of the IEPs identified as noncompliant to review and amend the IEP. Annual goals must address the 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. The Department will verify 100% compliance in this area through a review of new records that have been written after all trainings have been completed.</p>	<p><input checked="" type="checkbox"/> Yes</p> <p>This finding needs to be addressed in a Corrective Action Plan.</p>

Record Review Item	Evidence of Findings	Evidence of Correction/Recommendations	Must be Addressed in CAP
		<p><u>Opportunities for Improvement</u></p> <p>There is an opportunity for professional development and targeted technical assistance in writing compliant measurable annual goals. 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 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	<p><i>34 CFR 300.320(a)(2)(i) [Definition of individualized education]</i></p> <p>Three out of seven, or 43%, applicable IEPs reviewed did not contain annual goals that address the child’s functional area(s) of need.</p> <p><u>Interviews</u></p> <p>Although most respondents indicated familiarity with identifying functional needs within the ETR, there is still a need for further training and technical assistance in this area.</p> <p><u>Concerns Noted</u></p> <p>Functional needs were mentioned in several ETRs as being an area of need but were not addressed in the IEP or were not noted as not a priority at this time.</p>	<p><u>Individual Correction</u></p> <p>The educational agency must reconvene the teams of the IEPs identified as noncompliant to review and amend the IEP. Annual goals must address the functional needs of the child unless the team provides evidence that the goals were prioritized based on the severity of the needs of the child.</p> <p><u>Systemic Correction</u></p> <p>The educational agency must submit evidence to the Department of written procedures and practices regarding the IEP process of addressing identified functional needs. The Department will verify 100% compliance in this area through a review of new records that have been written after all trainings have been completed.</p> <p><u>Opportunities for Improvement</u></p> <p>There is an opportunity for professional development and targeted technical assistance in writing compliant measurable annual goals. If functional needs were addressed in the ETR 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>	<p><input checked="" type="checkbox"/> Yes</p> <p>This finding needs to be addressed in a Corrective Action Plan.</p>

Record Review Item	Evidence of Findings	Evidence of Correction/Recommendations	Must be Addressed in CAP
DS-6	<p>34 CFR 300.320(a)(4) [Definition of individualized education program] OAC 3301-51-07 (H)(1)(e)(i) [Definition of IEP]</p> <p>Eight out of eight, or 100%, 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>Interviews</u></p> <p>Although most respondents indicated familiarity with writing specially designed instruction within the IEP, there is still a need for further training and technical assistance in this area.</p> <p><u>Concerns Noted</u></p> <p>In some cases, the specially designed instruction was generic in nature and not individualized to the needs of the student described in the present levels and goals. Other examples lacked specific instructional reference and only listed accommodations or instructional settings.</p> <p>In many cases, the specially designed instruction was missing one of the components, either the content, methodology, or delivery of 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 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. The Department will verify 100% compliance in this area through a review of new records that have been written after all trainings have been completed.</p> <p><u>Opportunities for Improvement</u></p> <p>Professional development in the area of writing compliant specially designed instruction would be beneficial.</p>	<p><input checked="" type="checkbox"/> Yes</p> <p>This finding needs to be addressed in a Corrective Action Plan.</p>
DS-7	<p>34 CFR 300.320(a)(7) [Definition of individualized education program] OAC 3301-51-07 (H)(1)(i) [Definition of IEP]</p> <p>All IEPs reviewed indicated the specific location where the specially designed instruction will be provided.</p>	<p><u>Individual Correction</u></p> <p>NA</p> <p><u>Systemic Correction</u></p> <p>NA</p>	<p><input checked="" type="checkbox"/> NA</p>

Record Review Item	Evidence of Findings	Evidence of Correction/Recommendations	Must be Addressed in CAP
DS-8	<p>34 CFR 300.320(a)(7) [Definition of individualized education program] OAC 3301-51-07 (H)(1)(i) [Definition of IEP]</p> <p>One out of eight, or 13%, IEPs reviewed did not indicate the amount of time and frequency of the specially designed instruction.</p> <p>Interviews</p> <p>General education teachers indicated that students with disabilities were pulled from the classroom for much longer than noted in their IEPs.</p> <p>Concerns Noted</p> <p>Locations must be separated for amount of time and frequency in each, or for multiple individuals providing instruction (intervention specialists or related service providers).</p>	<p>Individual Correction</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>Systemic Correction</p> <p>It is recommended that the educational agency review and revise its written procedures and practices for obtaining informed parental consent. The Department will verify 100% compliance in this area through a review of new records that have been written after all trainings have been completed.</p> <p>Opportunities for Improvement</p> <p>Millennium Community School should consider developing a formal process to ensure that all intervention specialists are delivering the required specially designed instruction to their students as it is written in the student's IEP.</p>	<p><input checked="" type="checkbox"/> No</p> <p>This finding does <u>not</u> need to be addressed in a Corrective Action Plan.</p>
DS-9	<p>34 CFR 300.324(a)(2)(v) [Development of IEP] OAC 3301-51-01(B)(3) [Applicability of requirements and definitions]</p> <p>There were no IEPs reviewed which required assistive technology to be identified.</p>	<p>Individual Correction</p> <p>NA</p> <p>Systemic Correction</p> <p>NA</p>	<p><input checked="" type="checkbox"/> NA</p>
DS-10	<p>34 CFR 300.320(a)(6)(i) [Definition of individualized education] OAC 3301-51-07 (H)(1)(g) [Definition of IEP]</p> <p>Seven out of eight, or 88%, IEPs reviewed did not identify accommodations provided to enable the child to be involved and make progress in the general education curriculum.</p> <p>Interviews</p> <p>It was noted during interviews that the onsite behavioral health counselors assist with breaks for students with disabilities.</p> <p>It was noted during interviews that students would benefit from a sensory room in the building.</p> <p>Concerns Noted</p> <p>Record reviews did not define the conditions and/or extent of the accommodations, including how many times a student is allowed breaks during each class period and for how long.</p> <p>The condition(s) and/or extent were not clearly explained (who, when and where services were provided).</p>	<p>Individual Correction</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>Systemic Correction</p> <p>The educational agency must submit evidence to the Department of written procedures and practices regarding accommodations. The Department will verify 100% compliance in this area through a review of new records that have been written after all trainings have been completed.</p>	<p><input checked="" type="checkbox"/> Yes</p> <p>This finding needs to be addressed in a Corrective Action Plan.</p>

Record Review Item	Evidence of Findings	Evidence of Correction/Recommendations	Must be Addressed in CAP
DS-11	<p>34 CFR 300.320(a)(4) [Definition of individualized education program] OAC 3301-51-07 (H)(1)(e) [Definition of IEP]</p> <p>Three out of three applicable IEPs reviewed, or 100%, did not identify modifications to enable the child to be involved and make progress in the general education curriculum.</p> <p>Interviews</p> <p>Although most respondents indicated familiarity with modifications, there is still a need for further training and technical assistance in the area of the components required.</p> <p>Concerns Noted</p> <p>The extent of and conditions for modifications were not explained. They did not refer to the current level of instruction or pace of instruction.</p>	<p>Individual Correction</p> <p>The educational agency must reconvene the teams of the IEPs identified as noncompliant to review the modifications that would alter the amount or complexity of grade-level materials and would enable the child to be involved and make progress in the general education curriculum and include them in the IEP.</p> <p>Systemic Correction</p> <p>The educational agency must submit evidence to the Department of written procedures and practices regarding modifications. The Department will verify 100% compliance in this area through a review of new records that have been written after all trainings have been completed.</p> <p>Opportunities for Improvement</p> <p>Training from SSTs as well as an internal monitoring review system would be very helpful to promote compliance in the area of modifications.</p>	<p><input checked="" type="checkbox"/> Yes</p> <p>This finding needs to be addressed in a Corrective Action Plan.</p>
DS-12	<p>34 CFR 300.320(a)(4) [Definition of individualized education program] OAC 3301-51-07 (H)(1)(e) [Definition of IEP]</p> <p>There were no applicable IEPs reviewed which required supports for school personnel to be identified to enable the child to be involved and make progress in the general education curriculum.</p>	<p>Individual Correction</p> <p>NA</p> <p>Systemic Correction</p> <p>NA</p>	<p><input checked="" type="checkbox"/> NA</p>
DS-13	<p>OAC 3301-51-07 (H)(1)(h)(ii) [Definition of IEP]</p> <p>One out of one applicable student record reviewed, or 100%, did not have a justification statement explaining why the student cannot participate in the regular assessment and why the alternate assessment is appropriate for the student.</p> <p>Interviews</p> <p>Some interviewees indicated they would like professional development on managing students with disabilities and their services. General education teachers would like to have more input in the process.</p> <p>Concerns Noted</p> <p>One record review revealed that the justification statement did not describe why the child cannot participate in the regular assessment or how the selected alternate assessment is appropriate for the student.</p>	<p>Individual Correction</p> <p>The educational agency must reconvene the teams of the IEPs identified as noncompliant to review and determine if the alternate assessment is appropriate for the student.</p> <p>Systemic Correction</p> <p>The educational agency must submit evidence to the Department of written procedures and practices regarding the determination of participation in the AASCD. The Department will verify 100% compliance in this area through a review of new records that have been written after all trainings have been completed.</p>	<p><input checked="" type="checkbox"/> Yes</p> <p>This finding needs to be addressed in a Corrective Action Plan.</p>

Record Review Item	Evidence of Findings	Evidence of Correction/Recommendations	Must be Addressed in CAP
DS-14	<p><i>OAC 3301-51-07(L)(2) [Development, review and revision of IEP]</i></p> <p>Five out of seven, or 71%, applicable student records reviewed did not show evidence of progress reporting data collected and analyzed to monitor performance on each goal.</p> <p><u>Interviews</u></p> <p>Although most respondents indicated familiarity with the required elements for progress monitoring, there is still a need for further training and technical assistance in this area.</p> <p><u>Concerns Noted</u></p> <p>During record reviews, it was found that many records did not include quantitative and qualitative data in the actual goal. Progress was only reported on the objectives.</p> <p>Progress on goals should be reported in alignment to the measurement used in the annual goal statement.</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. The Department will verify 100% compliance in this area through a review of new records that have been written after all trainings have been completed.</p>	<p><input checked="" type="checkbox"/> Yes</p> <p>This finding needs to be addressed in a Corrective Action Plan.</p>
DS-15	<p><i>OAC 3301-51-07(L) [Development, review and revision of IEP]</i></p> <p>Two out of two applicable IEPs reviewed, or 100%, did not show evidence that revisions were made based on data indicating changes in student needs or abilities.</p> <p><u>Interviews</u></p> <p>Staff indicated during interview sessions that they have not reconvened the team when a student has not made progress.</p> <p><u>Concerns Noted</u></p> <p>Through the review of records and progress reports, it appears Millennium’s special education staff is not familiar with the IEP amendment process.</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. The Department will verify 100% compliance in this area through a review of new records that have been written after all trainings have been completed.</p> <p><u>Opportunities for Improvement</u></p> <p>Training from the State Support Team would be very helpful to promote compliance in the areas of progress monitoring and the amendment process.</p>	<p><input checked="" type="checkbox"/> Yes</p> <p>This finding needs to be addressed in a Corrective Action Plan.</p>
DS-16	<p><i>34 CFR 300.321(5) [IEP team]</i> <i>OAC 3301-51-07(I) [IEP team]</i></p> <p>All IEPs reviewed indicated that the IEP Team included a group of qualified professionals.</p>	<p><u>Individual Correction</u></p> <p>NA</p> <p><u>Systemic Correction</u></p> <p>NA</p>	<p><input checked="" type="checkbox"/> NA</p>

Component 3: Least Restrictive Environment (LRE) and IEP Alignment

Each educational agency shall ensure that to the maximum extent appropriate, children with disabilities, including children in public or nonpublic institutions or other care facilities, are educated with children who are nondisabled; and that a continuum of alternative placements is available to meet the needs of children with disabilities for special education and related services.

Record Review Item	Evidence of Findings	Evidence of Correction/Recommendations	Must be Addressed in CAP
LRE-1	<p>34 CFR 300.114 [LRE requirements] and 300.320(a)(5) [Definition of individualized education program] OAC 3301-51-07 (H)(1)(f) [Definition of individualized education program]</p> <p>Five out of eight, or 63%, 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>Interviews</u></p> <p>During interviews, there were inconsistencies reported regarding the understanding of LRE and a continuum of services. Students are pulled out of classrooms to receive specially designed instruction, to their detriment, as these students are not receiving instruction in the general education curriculum.</p> <p>The continuum of alternative placements under rule 3301-51-09 Delivery of services (C) did not appear to be available across all settings.</p> <p><u>Concerns Noted</u></p> <p>Through IEP Verifications, it appears that specially designed instruction is only provided by the Intervention Specialist in the Intervention/Resource 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"> • Be based on the needs of the child, not the disability. • Reflect that the team has given adequate consideration to meeting the student’s needs in the general classroom with supplementary aids and services. • Document that the nature or severity of the disability is such that education in general education classes, even with the use of supplementary aids and services, cannot be achieved satisfactorily. • Describe potential harmful effects to the child or others, if applicable. <p><u>Systemic Correction</u></p> <p>The educational agency must submit evidence to the Department of written procedures and practices regarding the least restrictive environment decision process and continuum of alternative placements available. The Department will verify 100% compliance in this area through a review of new records written after all trainings have been completed.</p>	<p><input checked="" type="checkbox"/> Yes</p> <p>This finding needs to be addressed in a Corrective Action Plan.</p>

Additional Considerations and Opportunities for Improvement:

- During the interview sessions, both intervention specialists and general education teachers expressed a need for a co-teaching model, as well as professional development and support at the building level for a co-teaching model to be successful. They also voiced the need for common planning time.
- Positive Behavioral Interventions and Supports (PBIS): The need for behavior supports was a prominent topic in interviews with all staff. School administration has stated their awareness of the need for professional development in this area and have mentioned embracing PBIS and Trauma-Informed Care. Interviews with staff have revealed a supportive culture and general readiness to fine-tuning these supports on a school-wide level.
- Due to the high number of English Learners who also qualify for special education services, the school should consider working with the Department's Office of Whole Child Supports to review and revise their procedures for serving these students.
- Millennium Community School would benefit from developing a new teacher onboarding process geared toward training any new staff member in their Special Education Policies, Procedures and Practices.
- Many interviewees indicated that there are no formal TBT or BLT meetings that include all staff members. There is an opportunity for Millennium Community School to enhance their MTSS process by incorporating common language across the school and further developing their process of collecting and tracking data.
- It is recommended that Millennium Community School document the involvement of partnering behavior health agencies and their role in the evaluation process.
- During the interview sessions, many respondents expressed a need for further training in working with students with autism, as well as opportunities to observe other staff members.
- Administrators stated that they pass the laptop around to sign documents by typing names, but that the vendor previously did not allow for electronic signatures. It is recommended that Millennium develop a process for collecting digital signatures.