

<b>Paint Valley Local School District IRN: 049510</b>
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## **Ohio Department of Education, Office for Exceptional Children 2019-2020 IDEA Monitoring Review Summary Report**

### **Introduction**

The Ohio Department of Education's Office for Exceptional Children (OEC) would like to extend appreciation to the Paint Valley Local School District staff for their efforts, attention and time committed to the completion of the review process.

The following report is a summary of the onsite review conducted by OEC on March 3 and 4, 2020, as part of its general supervision requirements under the Individuals with Disabilities Education Act (IDEA) and Am. Sub. H.B.1.

### **Overview**

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

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

Onsite reviews are targeted to include the following specific areas:

- Child Find;
- Delivery of Services;
- Least Restrictive Environment;
- IEP Verification of delivery of services;
- Parent Input; and
- Teacher and Administrator Interviews.

### **Data Sources**

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

1. Public Parent Meeting and Written Comments

Paint Valley Local School District mailed 109 OEC approved letters to all families with students with disabilities in the educational agency. OEC provided the educational agency with a public meeting announcement to post on the district website. Public parent meeting dates for all educational agencies selected for onsite reviews are also posted on the ODE website.

On March 3, 2020, OEC consultants held a public meeting for parents and other interested parties. Two parents and family members and one State Support Team (SST) Region 15 representative attended the public meeting. Attendees could speak to OEC representatives publicly in the meeting, speak to OEC representatives individually, provide written comments or both. Two attendees made comments during the public meeting. Written comment forms were available before, during and after the meeting. OEC did not receive any written comments; however, received two phone calls.

During the public meeting, parents were advised by OEC consultants of the formal complaint process under IDEA and that their public comments did not constitute a formal complaint. The participants were also informed that while the information they provided may be helpful to the review, it may not necessarily be acted upon as part of the review process. Ohio's procedural safeguards notice was available for participants who wanted a copy.

## 2. Pre-Onsite Data Analysis

OEC conducted a comprehensive review which included district, building and grade level data; Special Education Performance Profile; Local Report Cards; Comprehensive Continuous Improvement Plan (CCIP); and Education Management Information System (EMIS) data. The data analysis assisted OEC in determining potential growth areas and educational agency strengths.

## 3. Record Review/IEP Verification

Prior to the onsite visit, OEC consultants reviewed 19 records of students with disabilities. OEC selected records of students with disabilities from a variety of disability categories and ages. Eight student records were selected for IEP verification in the classroom setting.

## 4. Staff/Administrative Interviews

On March 3, 2020, OEC consultants held nine sessions of interviews with eight administrators and 30 teachers, school counselors, related services personnel and school psychologists. OEC interviews focused on the following review areas: Child Find; Delivery of Services; Least Restrictive Environment (LRE) and IEP alignment and Discipline.

### **Findings of Noncompliance**

A finding is made when noncompliance is identified with evaluation team report (ETR) and/or individualized education program (IEP) requirements. A noncompliance level of 30% or greater in any single area or in specific areas of concern found during the onsite review activities, a Corrective Action Plan (CAP) will need to be developed to address those areas. All noncompliance identified by OEC as part of the review (listed by subject area in the *OEC's Review Findings and Educational Agency Required Actions Table*) must be corrected as indicated in the *Evidence of Correction/Required Actions* column.

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

### **Corrective Action Plan (CAP)**

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

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

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

**CAP Due Date: December 10, 2020**

### **OEC Trainings**

As part of the OEC monitoring process, Paint Valley Local School District personnel, as identified by OEC, are required to complete the Special Education Essentials 2019-2020 training modules within the Learning Management System (LMS). OEC will provide specific instructions on completing these training modules during the Summary Report presentation. Participants must achieve a 75% or more on each quiz. Participants who do not achieve at least 75% will be contacted by the State Support Team (SST) for additional training.

**Completion of LMS Training Modules Due Date: December 10, 2020**

### **Individual Correction**

The educational agency has **60 school days** from the date of this summary report to correct all identified findings of noncompliance for individual students, unless noted otherwise in the report. Detailed information on individual findings are provided in a separate report.

*Individual Correction Due Date: **February 9, 2021***

### **CAP Activities and Systemic Correction**

The educational agency will provide OEC with documentation verifying the educational agency's completion of all CAP activities and all systemic corrections noted in this summary report. OEC will verify systemic correction through the review of this documentation. If needed, OEC may request additional student records to review.

*Completion of CAP Activities and Systemic Correction Due Date: **May 21, 2021***

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

For questions regarding the review, please contact: Raymond McCain, OEC Contact Consultant, at 614-593-5477, toll-free at (877) 644-6338, or by e-mail at [Raymond.mccain@education.ohio.gov](mailto:Raymond.mccain@education.ohio.gov).

**OEC's Review Findings and Educational Agency Required Actions**

**Component 1: Child Find**

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

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
CF-1	300.305(a) and 3301-51-11 (c)(1)(a)	<p><u>Record Review</u> Preschool records were not reviewed.</p>	<p><u>Individual Correction</u> NA</p> <p><u>Systemic Correction</u> NA</p>	<input checked="" type="checkbox"/> NA
CF-2	3301-51-06	<p><u>Record Review</u> Eight evaluations did not appropriately document interventions provided to resolve concerns for the child performing below grade-level standards.</p> <p><u>Interviews</u> Interviewees identified a concern that the Response to Intervention (RtI) process did not yet work as expected, and that referrals for interventions were not always addressed for action. Assistance with tier 2 and tier 3 interventions was requested by staff. There is a district approach to strengthening this process that has yet to be fully deployed across all buildings.</p> <p>Interviews revealed that the intervention process is grade-level specific. It would benefit the district to explore which grade levels are most successful in handling the intervention process and consider adopting those best-practices on a district-wide level.</p> <p><u>Other Considerations</u> Paint Valley Local Schools would benefit from creating and implementing a district wide RTI process that will be established for all grade levels. All members of Paint Valley Local Schools will be trained on the correct implementation of this RTI process along with monitoring from administration to provide any additional technical assistance needed.</p>	<p><u>Individual Correction</u> OEC has verified that these students have a current ETR in place, so no additional individual correction is required.</p> <p><u>Systemic Correction</u> The educational agency must submit evidence to OEC of written procedures and practices regarding documentation of intervention and supports provided prior to completion of the initial and reevaluation team report.</p>	<input checked="" type="checkbox"/> Yes The educational agency needs to address this finding in a Corrective Action Plan.

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
CF-3	300.501(b)(1) 3301-51-06 (E)(2)(a)	<u>Record Review</u> All student records showed evidence that the parent was afforded the opportunity to participate in the evaluation team planning meeting.	<u>Individual Correction</u> NA  <u>Systemic Correction</u> NA	<input checked="" type="checkbox"/> NA
CF-4	300.300	<u>Record Review</u> Four student records did not provide evidence of parental consent obtained prior to new testing.	<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.  The evidence may include, prior written notice, parent invitation, communication log, or other documented attempts to obtain parental informed, written consent.  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.  <u>Systemic Correction</u> The educational agency must submit evidence to OEC of written procedures and practices for obtaining parental consent obtained prior to new testing or policies and practices for moving forward when parents will not participate.	<input checked="" type="checkbox"/> No The educational agency does <u>not</u> need to address this finding in a Corrective Action Plan.

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
CF-5	300.304(c)(4) 3301-51-01 3301-51-06 (E)(2)(a)	<p><u>Record Review</u></p> <p>Nineteen (19) evaluations did not provide evidence that the evaluation addresses all areas related to the suspected disability.</p> <p><u>Interviews</u></p> <p>Respondents identified a problematic lack of addressing specific student issues with interventions before the evaluation process.</p> <p><u>Other Considerations</u></p> <p>There is a need to refine the ETR planning and individual evaluator's input process. In several cases, assessments on the planning form did not appear in Part 1, or assessments appeared that were not included on the planning form.</p> <p>Paint Valley must 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>Part 1 forms used by Paint Valley are often missing the summary, needs and implications section. It appears an old 2009 form continues to be used which does not contain all the areas required in a Part 1 report.</p>	<p><u>Individual Correction</u></p> <p>The educational agency will convene the ETR teams to conduct a reevaluation and provide evidence that the evaluation addresses all areas related to the suspected disability.</p> <p><u>Systemic Correction</u></p> <p>The educational agency must submit evidence to OEC of written procedures and practices to provide evidence that the evaluation addresses all areas related to the suspected disability.</p>	<input checked="" type="checkbox"/> Yes <p>The educational agency needs to address this finding in a Corrective Action Plan.</p>

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
CF-6	300.306(c)	<p><u>Record Review</u></p> <p>Sixteen (16) evaluations did not show evidence of clearly stating the summary of assessment results.</p> <p><u>Other Considerations</u></p> <p>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 all 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><u>Individual Correction</u></p> <p>The educational agency will reconvene the ETR teams to conduct a reevaluation and provide a clear and concise summary of the data and assessment conducted that meets the requirements of 3301-51-06 (G) (Summary of information). The IEP team must consider the results of this reevaluation.</p> <p><u>Systemic Correction</u></p> <p>The educational agency must submit evidence to OEC of written procedures and practices regarding summary of data and assessment results.</p>	<input checked="" type="checkbox"/> Yes <p>The educational agency needs to address this finding in a Corrective Action Plan.</p>
CF-7	300.306(c)	<p><u>Record Review</u></p> <p>Nine evaluation team reports did not contain a clear and succinct description of educational needs.</p> <p><u>Other Considerations</u></p> <p>Educational needs were sometimes generic in nature and did not address the child's individualized needs. Sometimes educational needs were stated in Part 1 but were not included into the Part 2 summary.</p>	<p><u>Individual Correction</u></p> <p>The educational agency will reconvene the ETR teams to conduct a reevaluation and provide a clear and succinct description of the student's educational needs. The IEP team must consider the results of this reevaluation.</p> <p><u>Systemic Correction</u></p> <p>The educational agency must submit evidence to OEC of written procedures and practices regarding description of educational needs.</p>	<input checked="" type="checkbox"/> Yes <p>The educational agency needs to address this finding in a Corrective Action Plan.</p>

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
CF-8	300.306(c)	<p><u>Record Review</u></p> <p>Ten (10) evaluation team reports did not contain specific implications for instruction.</p> <p><u>Other Considerations</u></p> <p>Sometimes implications for instruction were stated in Part 1 but were not included into the Part 2 summary.</p>	<p><u>Individual Correction</u></p> <p>The educational agency will reconvene the ETR teams to conduct a reevaluation and provide a clear description of specific implications for instruction. The IEP team must consider the results of this reevaluation.</p> <p><u>Systemic Correction</u></p> <p>The educational agency must submit evidence to OEC of written procedures and practices regarding implications for instruction.</p>	<input checked="" type="checkbox"/> Yes <p>The educational agency needs to address this finding in a Corrective Action Plan.</p>
CF-9	300.306(a)(1) 3301-51-01 (B)(21)	<p><u>Record Review</u></p> <p>Four evaluations did not show evidence that a group of qualified professionals, as appropriate to the suspected disability, were involved in determining whether the child is a child with a disability as well as the child's educational needs.</p>	<p><u>Individual Correction</u></p> <p>The educational agency must provide evidence that the ETR teams and other qualified professionals, as appropriate, participated in the determination of eligibility and educational needs. If not, the ETR team must reconvene and provide OEC evidence of group participation.</p> <p><u>Systemic Correction</u></p> <p>The educational agency must submit evidence to OEC of written procedures and practices regarding the eligibility determination process.</p>	<input checked="" type="checkbox"/> No <p>The educational agency does <u>not</u> need to address this finding in a Corrective Action Plan.</p>



**Component 2: Delivery of Services**

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

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
DS-1	SPP Indicator 13 300.320 (b) 3301-51-07 (H)(2)	<p><u>Record Review</u></p> <p>Eleven (11) IEPs did not show evidence that the postsecondary transition plan met all eight required elements of the IDEA for the student, specifically in the following area(s):</p> <ol style="list-style-type: none"> <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>Interviews</u></p> <p>Interviews revealed a lack of understanding of the secondary transition process and responsibilities, indicating a need for training and technical assistance in this area.</p> <p><u>Other Considerations</u></p>	<p><u>Individual Correction</u></p> <p>The educational agency must reconvene the teams to review and correct the postsecondary transition plan for the IEPs identified as noncompliant or provide documentation of the student's withdrawal date from the educational agency.</p> <p><u>Systemic Correction</u></p> <p>The educational agency must submit evidence to OEC of written procedures and practices regarding transition services.</p>	<p><input checked="" type="checkbox"/> Yes</p> <p>The educational agency needs to address this finding in a Corrective Action Plan.</p>

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
		<p>Several Transition Plans did contain the student's Preferences, Interests, Needs and Strengths (PINS) that were gathered from appropriate AATAs; however, they appeared to be the same for all three postsecondary goals. There is an opportunity for Paint Valley 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>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>Training must be provided to all ETR and IEP members responsible for assessing and writing transition plans to ensure they are compliant and beneficial to the student.</p>		
DS-2	300.320(a)(1)	<p><u>Record Review</u></p> <p>Eighteen (18) IEPs did not contain Present Levels of Academic Achievement and Functional Performance (PLOP) that addressed the needs of the student.</p> <p><u>Interviews</u></p> <p>Several staff members indicated they use common assessment data in order to create a current baseline for the Present Levels of Performance. However, these data points are not specific to the deficits described in the goals.</p> <p>Interviews revealed a request from staff for more Professional Development in how to write compliant IEP's.</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 OEC of written procedures and practices regarding the review of current academic/functional data when writing IEPs.</p>	<p><input checked="" type="checkbox"/> Yes</p> <p>The educational agency needs to address this finding in a Corrective Action Plan.</p>

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
		<p><u>Other Considerations</u></p> <p>The present levels of performance in the IEPs reviewed were inconsistent in quality and content. Measurable baseline data and comparison to grade level standards were missing in many cases. Often, the present levels of performance did not relate to the annual goal. An internal monitoring and review system would be very helpful to promote compliance in present levels of performance.</p> <p>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>		
DS-3	300.320(a)(2)(i)	<p><u>Record Review</u></p> <p>Twelve (12) IEPs did not contain measurable annual goals.</p> <p><u>Interviews</u></p> <p>Although most respondents indicated familiarity with the required elements for annual IEP goals, there is still a need for further training and technical assistance in this area.</p> <p><u>Other Considerations</u></p> <p>At times, the IEP goals lacked clarity of behaviors expected and of the specific measurements for achievement and mastery of the goals. An internal monitoring and review system would be very helpful to promote compliance in annual IEP goals.</p>	<p><u>Individual Correction</u></p> <p>The educational agency must reconvene the teams of the IEPs identified as noncompliant to review and amend annual goals to contain the following critical elements:</p> <ol style="list-style-type: none"> <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 OEC of written procedures and practices regarding the development of measurable annual IEP goals.</p>	<p><input checked="" type="checkbox"/> Yes</p> <p>The educational agency needs to address this finding in a Corrective Action Plan.</p>

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
DS-4	300.320(a)(2)(i)	<p><u>Record Review</u></p> <p>Two IEPs did not contain annual goals that address the child's academic area(s) of need.</p>	<p><u>Individual Correction</u></p> <p>The educational agency must reconvene the teams of the IEPs identified as noncompliant to review and amend the IEP. Annual goals must address the academic needs of the child unless the team provides evidence that the goals were prioritized based on the severity of the needs of the child.</p> <p><u>Systemic Correction</u></p> <p>The educational agency must submit evidence to OEC of written procedures and practices regarding the IEP process of addressing identified academic needs.</p>	<p><input checked="" type="checkbox"/> No</p> <p>The educational agency does <u>not</u> need to address this finding in a Corrective Action Plan.</p>
DS-5	300.320(a)(2)(i)	<p><u>Record Review</u></p> <p>Five IEPs did not contain annual goals that address the child's functional area(s) of need.</p> <p><u>Interviews</u></p> <p>Some respondents indicated Behavior Intervention Plans were not clearly communicated, or not followed with fidelity. Opportunity for professional development and targeted technical assistance around functional needs, including Behavior Intervention Plans, is needed.</p> <p><u>Other Considerations</u></p> <p>If functional needs were addressed in the ETR as being an area of concern, they must be addressed in the IEP in some capacity. It can either be addressed as a goal, a related service or a statement that indicates the team has prioritized other needs or found that it is not an area of concern at this time.</p>	<p><u>Individual Correction</u></p> <p>The educational agency must reconvene the teams of the IEPs identified as noncompliant to review and amend the IEP. Annual goals must address the functional needs of the child unless the team provides evidence that the goals were prioritized based on the severity of the needs of the child.</p> <p><u>Systemic Correction</u></p> <p>The educational agency must submit evidence to OEC of written procedures and practices regarding the IEP process of addressing identified functional needs.</p>	<p><input checked="" type="checkbox"/> Yes</p> <p>The educational agency needs to address this finding in a Corrective Action Plan.</p>

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
DS-6	300.320(a)(4) 3301-51-07 (H)(1)(e)(i)	<p><u>Record Review</u></p> <p>Five IEPs did not contain a statement of specially designed instruction that addresses the individual needs of the child and supports the annual goals.</p> <p><u>Interviews</u></p> <p>Intervention specialists found it difficult to provide specially designed instruction to their students due to a lack of space, number of students on their caseload, or lack of time in the day.</p> <p>It was stated in interviews that Intervention Specialists pull students “here or there”, and at different times “when they can”.</p> <p>Both General Education Teachers and Intervention Specialists shared a concern that having only one Intervention Specialist at the K-2 level is not enough to provide appropriate supports for those students. They feel strongly more support (specifically more IS time) is needed at these grade levels.</p> <p>General Education staff shared they do not understand the need for or use of an Individualized Education Program indicating a need for training and technical support in this area.</p> <p><u>Other Considerations:</u></p> <p>Even though Specially Designed Instruction did not meet the 30% threshold for a mandatory CAP component, several issues arose during the interview session, making this a topic of importance. With that statement, Paint Valley Local Schools must revisit and revise how Specially Designed Instruction is stated within the IEP, provided within the classroom and tracked throughout the day. With the development of procedures and training on Specially Designed Instruction, Paint Valley’s IEPs will be better equipped for ensuring that Free and Appropriate Public Education is being delivered.</p>	<p><u>Individual Correction</u></p> <p>The educational agency must reconvene the teams of the IEPs identified as noncompliant to review and amend the specially designed instruction, as appropriate, to address the needs of the child.</p> <p><u>Systemic Correction</u></p> <p>The educational agency must submit evidence to OEC of written procedures and practices regarding the IEP process of determining specially designed instruction.</p>	<p><input checked="" type="checkbox"/> Yes</p> <p>The educational agency needs to address this finding in a Corrective Action Plan.</p>

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
DS-7	300.320(a)(7) 3301-51-07 (H)(1)(i)	<u>Record Review</u> Four IEPs did not indicate the specific location where the specially designed instruction will be provided.	<u>Individual Correction</u> The educational agency must reconvene the teams of the IEPs identified as noncompliant to review and amend the location where the specially designed instruction will be provided.  <u>Systemic Correction</u> The educational agency must submit evidence to OEC of written procedures and practices regarding the IEP process of determining the location where specially designed instruction will occur.	<input checked="" type="checkbox"/> No The educational agency does <u>not</u> need to address this finding in a Corrective Action Plan.
DS-8	300.320(a)(7) 3301-51-07 (H)(1)(i)	<u>Record Review</u> All IEPs indicated the amount of time and frequency of the specially designed instruction.	<u>Individual Correction</u> NA  <u>Systemic Correction</u> NA	<input checked="" type="checkbox"/> NA
DS-9	300.320(a)(4) 3301-51-07 (H)(1)(e)	<u>Record Review</u> One IEP did not identify related services that address the needs of the child and support the annual goals.	<u>Individual Correction</u> The educational agency must reconvene the team of the IEP identified as noncompliant to review and amend the IEP to include related services that were identified as needed in the IEP.  <u>Systemic Correction</u> The educational agency must submit evidence to OEC of written procedures and practices regarding the IEP process of addressing identified related service needs.	<input checked="" type="checkbox"/> No The educational agency does <u>not</u> need to address this finding in a Corrective Action Plan.
DS-10	300.320(a)(7) 3301-51-07 (H)(1)(i)	<u>Record Review</u> One IEP did not indicate the location where the related services will be provided.	<u>Individual Correction</u> The educational agency must reconvene the team of the IEP identified as noncompliant to review and amend the IEP to include the location where the related services will be provided.  <u>Systemic Correction</u> The educational agency must submit evidence to OEC of written procedures and practices regarding the IEP process of determining the location where related services will occur.	<input checked="" type="checkbox"/> No The educational agency does <u>not</u> need to address this finding in a Corrective Action Plan.

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
DS-11	300.320(a)(7) 3301-51-07 (H)(1)(i)	<u>Record Review</u> All IEPs indicated the amount of time, duration and frequency of the related services to be provided.	<u>Individual Correction</u> NA <u>Systemic Correction</u> NA	<input checked="" type="checkbox"/> NA
DS-12	300.324(a)(2)(v) 3301-51-01(B)(3)	<u>Record Review</u> There were no applicable IEPs reviewed regarding assistive technology to enable the child to be involved and make progress in the general education curriculum.	<u>Individual Correction</u> NA <u>Systemic Correction</u> NA	<input checked="" type="checkbox"/> NA
DS-13	300.320(a)(6)(i) 3301-51-07 (H)(1)(g)	<u>Record Review</u> Twelve (12) IEPs did not identify accommodations provided to enable the child to be involved and make progress in the general education curriculum. <u>Interviews</u> The need for and use of accommodations was misunderstood by some staff members, indicating a need for training and technical support in this area. <u>Other Considerations</u> 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. Training from SSTs as well as an internal monitoring review system would be very helpful to promote compliance in the area of accommodations.	<u>Individual Correction</u> The educational agency must reconvene the teams of the IEPs identified as noncompliant to review the accommodations that would directly assist the child to access the course content without altering the scope or complexity of the information taught and include them on the IEP. <u>Systemic Correction</u> The educational agency must submit evidence to OEC of written procedures and practices regarding accommodations.	<input checked="" type="checkbox"/> Yes The educational agency needs to address this finding in a Corrective Action Plan.

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
DS-14	300.320(a)(4) 3301-51-07 (H)(1)(e)	<p><u>Record Review</u></p> <p>Four IEPs did not identify modifications to enable the child to be involved and make progress in the general education curriculum.</p> <p><u>Other Considerations</u></p> <p>This area is an opportunity for professional development and/or targeted technical assistance to address the content that students are expected to learn where amount or complexity of materials are altered from grade level curriculum expectations. When an instructional or curriculum modification is made, either the specific subject matter is altered, or the performance expected of the student is changed.</p>	<p><u>Individual Correction</u></p> <p>The educational agency must reconvene the teams of the IEPs identified as noncompliant to review the modifications that would alter the amount or complexity of grade-level materials and would enable the child to be involved and make progress in the general education curriculum and include them in the IEP</p> <p><u>Systemic Correction</u></p> <p>The educational agency must submit evidence to OEC of written procedures and practices regarding modifications.</p>	<input checked="" type="checkbox"/> Yes <p>The educational agency needs to address this finding in a Corrective Action Plan.</p>
DS-15	300.320(a)(4) 3301-51-07 (H)(1)(e)	<p><u>Record Review</u></p> <p>One IEP did not identify supports for school personnel to enable the child to be involved and make progress in the general education curriculum.</p>	<p><u>Individual Correction</u></p> <p>The educational agency must reconvene the team of the IEP identified as noncompliant to review the supports for school personnel that were identified by the IEP team and define the supports on the IEP including who will provide the support and when it will take place.”</p> <p><u>Systemic Correction</u></p> <p>The educational agency must submit evidence to OEC of written procedures and practices regarding supports for school personnel.</p>	<input checked="" type="checkbox"/> No <p>The educational agency does <u>not</u> need to address this finding in a Corrective Action Plan.</p>
DS-16	3301-51-07 (H)(1)(h)(ii)	<p><u>Record Review</u></p> <p>All applicable student records have a justification statement explaining why the student cannot participate in the regular assessment and why the alternate assessment is appropriate for the student.</p>	<p><u>Individual Correction</u></p> <p>NA</p> <p><u>Systemic Correction</u></p> <p>NA</p>	<input checked="" type="checkbox"/> NA



Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
DS-17	3301-51-07(L)(2)	<p><u>Record Review</u></p> <p>Fourteen (14) IEPs did not contain measurable annual goals and services/placement consistent with progress made.</p> <p><u>Interviews</u></p> <p>The need for progress monitoring was misunderstood by some staff members, indicating a need for training and technical support in this area.</p> <p><u>Other Considerations</u></p> <p>In many cases, progress monitoring reports/documents were not submitted and/or the evidence was vague in description.</p> <p>Training from SSTs as well as an internal monitoring review system would be very helpful to promote compliance in the areas of progress monitoring.</p> <p>Parents present at the Parent Public Meeting were concerned about a lack of progress monitoring and an inability to received requested data about their child's progress.</p>	<p><u>Individual Correction</u></p> <p>None</p> <p><u>Systemic Correction</u></p> <p>The educational agency must submit evidence to OEC of written procedures and practices regarding measurable annual goals and services consistent with progress made.</p>	<input checked="" type="checkbox"/> Yes <p>The educational agency needs to address this finding in a Corrective Action Plan.</p>
DS-18	3301-51-07(L)	<p><u>Record Review</u></p> <p>All applicable IEPs showed evidence that revisions were made based on data indicating changes in student needs or abilities.</p>	<p><u>Individual Correction</u></p> <p>NA</p> <p><u>Systemic Correction</u></p> <p>NA</p>	<input checked="" type="checkbox"/> NA
DS-19	300.321(5) 3301-51-07(I)	<p><u>Record Review</u></p> <p>All IEPs 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>	<input checked="" type="checkbox"/> NA

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

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

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
LRE-1	300.114 300.320(a)(5) 3301-51-07 (H)(1)(f)	<p><u>Record Review</u></p> <p>One IEP did not include an explanation of the extent to which the child will not participate with nondisabled children in the general education classroom.</p> <p><u>Other Considerations</u></p> <p>One record lacked a clear justification for removal from the general education setting.</p> <p>A parent of a student attending Paint Valley Local schools shared a concern that their child's IEP was not being followed, particularly with regards to the time the student spends in the General Education Setting.</p>	<p><u>Individual Correction</u></p> <p>The educational agency must reconvene the team of the IEP 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 OEC of written procedures and practices regarding the least restrictive environment placement decision process.</p>	<p><input checked="" type="checkbox"/> No</p> <p>The educational agency does <u>not</u> need to address this finding in a Corrective Action Plan.</p>

### Commendations:

- Paint Valley School District staff are extremely passionate, caring and dedicated not only to students with disabilities, but the entire student body. This was evident through the interviewing process, IEP verifications and student/staff interactions.
- There appeared to be a good relationship between the general education teachers and intervention specialists regarding the co-teaching models Paint Valley School District has developed.

### Opportunities for Improvement

- During the interview sessions, both intervention specialists and general education teachers expressed a need for both 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.
- There is an opportunity for Paint Valley Local School District to enhance their Multi-Tier System of Support (MTSS) process by incorporating common language across all grade levels and further developing Tier 2 and 3 interventions. The use of interventions at various levels and other areas of describing their continuum of services are inconsistent. Also, Paint Valley Local School District could benefit from research and select evidence-based interventions (academic skill and/or behavior specific) along with decision rules for all Tier 2 and 3 interventions.
- Paint Valley Local School District has an opportunity to streamline their implementation of Positive Behavioral Interventions and Supports (PBIS) across all grade levels within the district. During interviews, it was shared that the implementation of PBIS varies throughout the district.
- There appears to be a disconnect between leadership's approach and vision and actual deployment of policies, procedures, practices and training across the district. Many promising initiatives have yet to reach all levels or be understood uniformly. Interviews revealed different views of how the district is doing in regard to serving students with disabilities. Administrative training on how to make changes and implement new policies, practices and procedures with fidelity is imperative.
- The district must review, revise or update the policies, procedures and practices regarding discipline and behavior support services. This includes Manifestation Determination Review (MDR), Functional Behavior Assessments (FBA) and Behavior Intervention Plans (BIP). Paint Valley would also benefit from a review and more training of their Restraint and Seclusion practices. Interviews revealed confusion regarding restraint use, as well as concerns regarding Behavior Intervention Plans. Staff were untrained and unaware of when and how to utilize the MDR process. The Parent Public Meeting also included concerns from a parent regarding the lack of implementation of a Behavior Intervention Plan.
- Parents who attended the public meeting had much to say, and they identified an opportunity to improve communication and collaboration in several areas. Meaningful IEP meetings and consistent communication was requested. Implementing both the IEP and the Behavior Plan were of high concern. There is confusion in who to contact when there are concerns or questions from the parent. Some issues and concerns around data collection and progress monitoring were also shared.
- Paraprofessionals shared in interviews they would like more professional development in areas such as Autism, ADHD/Anxiety, Behavior and Anger Management.
- Intervention Specialists shared a need for meetings with one another to get updated regulations for paperwork, training opportunities and time for vertical alignment.