

Wildwood Environmental Academy
IRN: 000222**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 Wildwood Environmental Academy 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 February 11-12, 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 (LRE);
- 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

Wildwood Environmental Academy mailed 83 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 February 11, 2020, OEC consultants held a public meeting for parents and other interested parties. No parents or family members attended the public meeting. One State Support Team (SST) Region 1 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. 0 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.

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 20 records of students with disabilities. OEC selected records of students with disabilities from a variety of disability categories and ages. Five student records were selected for IEP verification in the classroom setting and some areas of concern were found regarding the implementation of the various LRE classroom settings.

4. Staff/Administrative Interviews

On February 11, 2020, OEC consultants held 6 sessions of interviews with 4 administrators and 20 teachers, school counselors, related services personnel and school psychologists. OEC interviews focused on the following review areas: Child Find; Delivery of Services; LRE and IEP alignment and Discipline.

Findings of Noncompliance

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

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

Corrective Action Plan (CAP)

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

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

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

CAP Due Date: December 11th, 2020

OEC Trainings

As part of the OEC monitoring process, Wildwood Environmental Academy 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: **October 30th, 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 8th, 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 28th, 2021***

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

For questions regarding the review, please contact: Raymond McCain, OEC Contact Consultant, at (614) 752-1398, toll-free at (877) 644-6338, or by e-mail at raymond.mccain@education.ohio.gov.

OEC's Review Findings and Educational Agency Required Actions

Component 1: Child Find

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

| Record Review Item | Regulation 34 CFR or OAC | Evidence of Findings | Evidence of Correction | Must be addressed in CAP |
|--------------------|-------------------------------------|---|---|--|
| | | | Required Actions | |
| CF-1 | 300.305(a) and 3301-51-11 (c)(1)(a) | <p><u>Record Review</u></p> <p>Preschool records were not reviewed.</p> | <p><u>Individual Correction</u></p> <p>NA</p> <p><u>Systemic Correction</u></p> <p>NA</p> | <input checked="" type="checkbox"/> NA |
| CF-2 | 3301-51-06 | <p><u>Record Review</u></p> <p>Seven evaluations did not appropriately document interventions provided to resolve concerns for the child performing below grade-level standards.</p> <p><u>Interviews</u></p> <p>Interviews indicated that interventions are taking place for students through the Student-Based Intervention Team (SBIT) process. However, there did not appear to be a uniform process for documenting interventions and including them in the evaluation. Additionally, teachers stated there was a lack of interventions for students who are "misbehaving."</p> <p><u>Other Considerations</u></p> <p>It is recommended that Wildwood Environmental Academy develop a procedure of checks and balances to ensure interventions that are being provided to students are correctly documented within the ETR as well as in Part 2s Summary of Interventions.</p> | <p><u>Individual Correction</u></p> <p>OEC has verified that these students have a current ETR in place, so no additional individual correction is required.</p> <p><u>Systemic Correction</u></p> <p>The educational agency must submit evidence to OEC of written procedures and practices regarding documentation of intervention and supports provided prior to completion of the initial 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> Three student records did not show evidence that the parent was afforded the opportunity to participate in the evaluation team planning meeting. | <u>Individual Correction</u> The educational agency must provide evidence that the parent was involved or provided the opportunity to participate in the evaluation planning process. The evidence may include evaluation planning form, prior written notice, parent invitation, referral form or communication log. If the educational agency cannot provide documentation that the parent was involved or provided the opportunity to participate in the evaluation planning process, the educational agency must conduct a reevaluation planning meeting with the parent. <u>Systemic Correction</u> The educational agency must submit evidence to OEC of written procedures and practices that include the parent in the evaluation planning process. | <input checked="" type="checkbox"/> No The educational agency does <u>not</u> need to address this finding in a Corrective Action Plan. |
| CF-4 | 300.300 | <u>Record Review</u> Three 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. | <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 | |
| | | | <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. | |
| CF-5 | 300.304(c)(4) 3301-51-01 3301-51-06 (E)(2)(a) | <u>Record Review</u> Twenty (20) evaluations did not provide evidence that the evaluation addresses all areas related to the suspected disability. <u>Interviews</u> Staff members stated they would like to know exactly what is required for them to complete in a Part 1 of the ETR. It was also stated that some staff members are not sure what documents need to be completed prior to the ETR meeting, and what should be completed during the meeting. <u>Other Considerations</u> In several cases, assessments included on the planning form were not presented in Part 1 of the ETR. All assessments and data listed for evaluation on the ETR planning form, and agreed upon by the parent, must appear – in some form – in a Part 1 evaluator’s assessment. Observations require that the public agency must ensure that the child is observed in the child’s learning environment (including the regular classroom setting) to document the child’s academic performance and behavior in the area of difficulty (300.310). Observations were not always included for students where SLD was a suspected disability or observations were conducted during testing rather than in the child’s learning environment. | <u>Individual Correction</u> The educational agency will convene the ETR teams to conduct a reevaluation and provide evidence that the evaluation addresses all areas related to the suspected disability. <u>Systemic Correction</u> The educational agency must submit evidence to OEC of written procedures and practices to provide evidence that the evaluation addresses all areas related to the suspected disability. | <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-6 | 300.306(c) | <p><u>Record Review</u></p> <p>Fourteen (14) evaluations did not show evidence of clearly stating the summary of assessment results.</p> <p><u>Interviews</u></p> <p>Staff members stated they would like to see more training on how to complete Part 2 and Part 3 (SLD) of the ETR.</p> <p><u>Other Considerations</u></p> <p>The information from Part 1 was not summarized in a clear and concise manner in Part 2 summary of assessment results. In some instances, the information was entirely omitted. Information in Part 1 must be brought forward to Part 2 in a manner that can be clearly understood by the parent and used by the IEP team to develop meaningful goals and services.</p> | <p><u>Individual Correction</u></p> <p>The educational agency will reconvene the ETR teams to conduct a reevaluation and provide a clear and concise summary of the data and assessment conducted that meets the requirements of 3301-51-06 (G) (Summary of information). The IEP team must consider the results of this reevaluation.</p> <p><u>Systemic Correction</u></p> <p>The educational agency must submit evidence to OEC of written procedures and practices regarding summary of data and assessment results.</p> | <p><input checked="" type="checkbox"/> Yes</p> <p>The educational agency needs to address this finding in a Corrective Action Plan.</p> |
| CF-7 | 300.306(c) | <p><u>Record Review</u></p> <p>Seven evaluation team reports did not contain a clear and succinct description of educational needs.</p> <p><u>Other Considerations</u></p> <p>Educational needs were sometimes generic in nature and did not address the child's individualized needs. In several records, educational needs were stated in Part 1, but were not included in 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> | <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 | |
| CF-8 | 300.306(c) | <p><u>Record Review</u></p> <p>Six evaluation team reports did not contain specific implications for instruction.</p> <p><u>Other Considerations</u></p> <p>Record reviews revealed that implications for instruction were stated in Part 1 but were not included in the Part 2 summary. In some instances, only the school psychologist's idea of implications for instruction was represented without a clear summary representing other evaluators from the team.</p> | <p><u>Individual Correction</u></p> <p>The educational agency will reconvene the ETR teams to conduct a reevaluation and provide a clear description of specific implications for instruction. The IEP team must consider the results of this reevaluation.</p> <p><u>Systemic Correction</u></p> <p>The educational agency must submit evidence to OEC of written procedures and practices regarding implications for instruction.</p> | <p><input checked="" type="checkbox"/> Yes</p> <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>Three evaluations did not show evidence that a group of qualified professionals, as appropriate to the suspected disability, were involved in determining whether the child is a child with a disability as well as the child's educational needs.</p> | <p><u>Individual Correction</u></p> <p>The educational agency must provide evidence that the ETR teams and other qualified professionals, as appropriate, participated in the determination of eligibility and educational needs. If not, the ETR team must reconvene and provide OEC evidence of group participation.</p> <p><u>Systemic Correction</u></p> <p>The educational agency must submit evidence to OEC of written procedures and practices regarding the eligibility determination process.</p> | <p><input checked="" type="checkbox"/> No</p> <p>The educational agency does <u>not</u> need to address this finding in a Corrective Action Plan.</p> |

Component 2: Delivery of Services

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

| Record Review Item | Regulation 34 CFR or OAC | Evidence of Findings | Evidence of Correction | Must be addressed in CAP |
|--------------------|---|---|--|---|
| | | | Required Actions | |
| DS-1 | SPP Indicator 13 300.320 (b) 3301-51-07 (H)(2) | <p><u>Record Review</u></p> <p>Five IEPs did not show evidence that the postsecondary transition plan met all eight required elements of the IDEA for the student, specifically in the following area(s):</p> <ul style="list-style-type: none"> • There are appropriate measurable postsecondary goal(s). • The postsecondary goals are updated annually. • The postsecondary goals were based on age appropriate transition assessment (AATA). • There are transition services that will reasonably enable the student to meet the postsecondary goal(s). • The transition services include courses of study that will reasonably enable the student to meet the postsecondary goal(s). • The annual goal(s) are related to the student's transition service needs. • There is evidence the student was invited to the IEP Team Meeting where transition services were discussed. • When appropriate, there is evidence that a representative of any participating agency was invited to the IEP Team Meeting. <p><u>Interviews</u></p> <p>Interviews indicated that transition plans are written by one person (transition coordinator) with support from the Intervention Specialists. Although most respondents indicated familiarity with the required elements for Secondary Transition Plans, there is still a need for further training and technical assistance in this area.</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><u>Other Considerations</u></p> <ul style="list-style-type: none"> • Several instances were noted where the student seemed to be responsible for his or her own transition services, which is not appropriate. • Students must be invited to attend their own IEP meeting when transition planning is being considered, starting at age 14 or younger, if appropriate. • There is a need for all personnel involved with students of transition age to be trained in, and familiar with, the secondary transition process, including responsibilities at every level. | | |
| DS-2 | 300.320(a)(1) | <p><u>Record Review</u></p> <p>Twenty (20) IEPs did not contain Present Levels of Academic Achievement and Functional Performance (PLOP) that addressed the needs of the student.</p> <p><u>Other Considerations</u></p> <p>The present levels in the records reviewed were inconsistent in quality and content. Often, the baseline data did not relate to the annual goal and grade level standards were missing. An internal monitoring and review system would be very helpful to promote compliance in present levels.</p> | <p><u>Individual Correction</u></p> <p>The educational agency must reconvene the IEP teams of the IEPs identified as noncompliant to review and amend the PLOP related to each goal to include:</p> <ul style="list-style-type: none"> • Summary of current daily academic/behavior and/ or functional performance (strengths and needs) compared to expected grade level standards in order to provide a frame of reference; • PLOP must relate to the goal measurement • Baseline data provided for developing a measurable goal. <p><u>Systemic Correction</u></p> <p>The educational agency must submit evidence to OEC of written procedures and practices regarding the review of current academic/functional data when writing IEPs.</p> | <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 | |
| DS-3 | 300.320(a)(2)(i) | <p><u>Record Review</u></p> <p>Fifteen (15) IEPs did not contain measurable annual goals.</p> <p><u>Other Considerations</u></p> <p>Record reviews revealed that, in many cases, the IEP goals lacked clarity of behaviors expected and of the specific measurements for achievement and mastery of the goals. Some records listed multiple behaviors within the same goal. An internal monitoring and review system would be very helpful to promote compliance in annual IEP goals.</p> | <p><u>Individual Correction</u></p> <p>The educational agency must reconvene the teams of the IEPs identified as noncompliant to review and amend annual goals to contain the following critical elements:</p> <ol style="list-style-type: none"> 1. Clearly <u>defined behavior</u>: the specific action the child will be expected to perform. 2. The <u>condition</u> (situation, setting or given material) under which the behavior is to be performed. 3. <u>Performance criteria</u> desired: the level the child must demonstrate for mastery and the number of times the child must demonstrate the skill or behavior. <p><u>Systemic Correction</u></p> <p>The educational agency must submit evidence to OEC of written procedures and practices regarding the development of measurable annual IEP goals.</p> | <p><input checked="" type="checkbox"/> Yes</p> <p>The educational agency needs to address this finding in a Corrective Action Plan.</p> |
| DS-4 | 300.320(a)(2)(i) | <p><u>Record Review</u></p> <p>Four 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> |

| Record Review Item | Regulation 34 CFR or OAC | Evidence of Findings | Evidence of Correction | Must be addressed in CAP |
|--------------------|---|---|--|---|
| | | | Required Actions | |
| DS-5 | 300.320(a)(2)(i) | <p><u>Record Review</u></p> <p>Eight IEPs did not contain annual goals that address the child’s functional area(s) of need.</p> <p><u>Other Considerations</u></p> <p>If functional needs were addressed in the ETR as being an area of concern, they must be addressed in the IEP in some capacity. It can either be addressed as a goal, a related service or a statement that indicates the team has prioritized other needs or found that it is not an area of concern at this time.</p> | <p><u>Individual Correction</u></p> <p>The educational agency must reconvene the teams of the IEPs identified as noncompliant to review and amend the IEP. Annual goals must address the functional needs of the child unless the team provides evidence that the goals were prioritized based on the severity of the needs of the child.</p> <p><u>Systemic Correction</u></p> <p>The educational agency must submit evidence to OEC of written procedures and practices regarding the IEP process of addressing identified functional needs.</p> | <p><input checked="" type="checkbox"/> Yes</p> <p>The educational agency needs to address this finding in a Corrective Action Plan.</p> |
| DS-6 | 300.320(a)(4) 3301-51-07 (H)(1)(e)(i) | <p><u>Record Review</u></p> <p>Nine 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>Staff members indicated SDI is being delivered during a very specific scheduled time that does not allow for individualized student instruction or take into account student or teacher availability. SDI was being delivered based on the schedule of the school instead of the needs of the students.</p> <p><u>Other Considerations</u></p> <p>In some cases, records reviewed contained specially designed instruction that 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. SDI must be implemented as written within Section 7 of the IEP.</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) | <p><u>Record Review</u> Fifteen (15) IEPs did not indicate the specific location where the specially designed instruction will be provided.</p> <p><u>Other Considerations</u> Several of the records reviewed listed multiple locations for one SDI. Locations must be separated for amount of time and frequency in each. Training from SSTs as well as an internal monitoring review system would be very helpful to promote compliance in the areas of Specially Designed Instruction.</p> | <p><u>Individual Correction</u> The educational agency must reconvene the teams of the IEPs identified as noncompliant to review and amend the location where the specially designed instruction will be provided.</p> <p><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.</p> | <input checked="" type="checkbox"/> Yes The educational agency needs to address this finding in a Corrective Action Plan. |
| DS-8 | 300.320(a)(7) 3301-51-07 (H)(1)(i) | <p><u>Record Review</u> Nine IEPs did not indicate the amount of time and frequency of the specially designed instruction.</p> <p><u>Other Considerations</u> Time and frequency must relate to one specific provider. Several of the records reviewed had two providers listed for one specially designed instruction, this was usually for an inclusion/co-teaching type of instruction. Intervention Specialists and related service providers are both able to deliver specially designed instruction; however, if a general education teacher or educational aide is assigned to assist in the delivery of specially designed instruction, they must be included in the supports for school personnel box. Wildwood Environmental Academy will need to develop a procedure to ensure providers are correctly documented. Training from SSTs as well as an internal monitoring review system would be very helpful to promote compliance in SDI Amount and Frequency.</p> | <p><u>Individual Correction</u> The educational agency must reconvene the teams of the IEPs identified as noncompliant to review and amend the amount of time and frequency of the specially designed instruction.</p> <p><u>Systemic Correction</u> The educational agency must submit evidence to OEC of written procedures and practices regarding the IEP process of determining the amount and frequency of specially designed instruction to be provided.</p> | <input checked="" type="checkbox"/> Yes The educational agency needs to address this finding in a Corrective Action Plan. |

| Record Review Item | Regulation 34 CFR or OAC | Evidence of Findings | Evidence of Correction | Must be addressed in CAP |
|--------------------|--|--|--|--|
| | | | Required Actions | |
| DS-9 | 300.320(a)(4) 3301-51-07 (H)(1)(e) | <u>Record Review</u> All IEPs identified related services that address the needs of the child and support the annual goals. | <u>Individual Correction</u> NA <u>Systemic Correction</u> NA | <input checked="" type="checkbox"/> NA |
| DS-10 | 300.320(a)(7) 3301-51-07 (H)(1)(i) | <u>Record Review</u> Two IEPs did not indicate the location where the related services 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 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. |
| 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 |

| Record Review Item | Regulation 34 CFR or OAC | Evidence of Findings | Evidence of Correction | Must be addressed in CAP |
|--------------------|---|---|--|---|
| | | | Required Actions | |
| DS-12 | 300.324(a)(2)(v) 3301-51-01(B)(3) | <p><u>Record Review</u></p> <p>Three IEPs did not identify assistive technology to enable the child to be involved and make progress in the general education curriculum.</p> <p><u>Interviews</u></p> <p>Staff members indicated they would like more professional development on assistive technology and how students are using that technology to help provide access to instruction to meet their educational needs.</p> <p><u>Other Considerations</u></p> <p>Assistive technology must describe what will be provided to the student, for what purpose, under what conditions, how often, and to what extent.</p> <p>Training from SSTs as well as an internal monitoring review system would be very helpful to promote compliance in the areas of assistive technology</p> | <p><u>Individual Correction</u></p> <p>The educational agency must reconvene the teams of the IEPs identified as noncompliant to review assistive technology and/or services that would directly assist the child with a disability to increase, maintain, or improve their functional capabilities and include them on the IEP.</p> <p><u>Systemic Correction</u></p> <p>The educational agency must submit evidence to OEC of written procedures and practices regarding assistive technology.</p> | <input checked="" type="checkbox"/> Yes <p>The educational agency needs to address this finding in a Corrective Action Plan.</p> |
| DS-13 | 300.320(a)(6)(i) 3301-51-07(H)(1)(g) | <p><u>Record Review</u></p> <p>Eighteen (18) IEPs did not identify accommodations provided to enable the child to be involved and make progress in the general education curriculum.</p> <p><u>Interviews</u></p> <p>Staff members indicated they would like more professional development on how to accommodate students with disabilities within co-taught classes.</p> <p><u>Other Considerations</u></p> <p>IEP accommodations listed were not explained regarding conditions and extent of the accommodation. Phrases like “as needed” and “may need” are not acceptable in describing accommodations. Accommodations cannot be the choice of the teacher or the student.</p> | <p><u>Individual Correction</u></p> <p>The educational agency must reconvene the teams of the IEPs identified as noncompliant to review the accommodations that would directly assist the child to access the course content without altering the scope or complexity of the information taught and include them on the IEP.</p> <p><u>Systemic Correction</u></p> <p>The educational agency must submit evidence to OEC of written procedures and practices regarding accommodations.</p> | <input checked="" type="checkbox"/> Yes <p>The educational agency needs to address this finding in a Corrective Action Plan.</p> |

| Record Review Item | Regulation 34 CFR or OAC | Evidence of Findings | Evidence of Correction | Must be addressed in CAP |
|--------------------|--|---|---|---|
| | | | Required Actions | |
| | | Training from SSTs as well as internal monitoring review system would be very helpful to promote compliance in the areas of accommodations. | | |
| DS-14 | 300.320(a)(4) 3301-51-07 (H)(1)(e) | <p><u>Record Review</u></p> <p>Three IEPs did not identify modifications to enable the child to be involved and make progress in the general education curriculum.</p> <p><u>Other Considerations</u></p> <p>The extent of and conditions for modifications must be explained. Refer to the current level of instruction, reading level or pace of instruction. Phrases like “as needed” are not acceptable in describing modifications.</p> <p>An internal monitoring and review system would be very helpful to promote compliance when writing modifications within the IEP</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>Two IEPs did not identify supports for school personnel to enable the child to be involved and make progress in the general education curriculum.</p> <p><u>Other Considerations</u></p> <p>There is a need to better describe adult-to-adult consultation. Clarify the support to include who will receive; who will deliver; when the support will be provided; and for what purpose. For example, the Intervention Specialist consults with the General Education Teachers and Paraprofessionals on progress monitoring for a particular goal or goals. General Education Teachers/Paraprofessionals would then be listed as receiving support for school personnel.</p> <p>Wildwood Environmental Academy will need to develop a procedure to ensure providers are correctly documented.</p> | <p><u>Individual Correction</u></p> <p>The educational agency must reconvene the teams of the IEPs identified as noncompliant to review the supports for school personnel that were identified by the IEP team and define the supports on the IEP including who will provide the support and when it will take place.”</p> <p><u>Systemic Correction</u></p> <p>The educational agency must submit evidence to OEC of written procedures and practices regarding supports for school personnel.</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 | |
| DS-16 | 3301-51-07 (H)(1)(h)(ii) | <u>Record Review</u> All student records have a justification statement explaining why the student cannot participate in the regular assessment and why the alternate assessment is appropriate for the student. | <u>Individual Correction</u> NA <u>Systemic Correction</u> NA | <input checked="" type="checkbox"/> NA |
| DS-17 | 3301-51-07(L)(2) | <u>Record Review</u> Ten IEPs did not contain measurable annual goals and services/placement consistent with progress made. <u>Other Considerations</u> Progress must be recorded using the same performance criteria defined in the annual measurable goal. In some cases, progress monitoring reports/documents were not submitted and/or the evidence was vague in description. Wildwood Environmental Academy will need to develop a procedure to ensure progress reporting is correctly documented, stating how the student is progressing towards mastering their measurable annual goals. Professional development or training will also need to be provided so that all members of Wildwood Environmental Academy know what is expected when reporting progress to parents and students. | <u>Individual Correction</u> None <u>Systemic Correction</u> The educational agency must submit evidence to OEC of written procedures and practices regarding measurable annual goals and services consistent with progress made. | <input checked="" type="checkbox"/> Yes The educational agency needs to address this finding in a Corrective Action Plan. |
| DS-18 | 3301-51-07(L) | <u>Record Review</u> Three IEPs did not show evidence that revisions were made based on data indicating changes in student needs or abilities. <u>Interviews</u> Staff members indicated that IEPs are amended only when students transfer from other districts with a self-contained placement LRE statement; those IEPs are amended to reflect a co-teaching setting. | <u>Individual Correction</u> The educational agency must reconvene the teams to review and amend the IEPs to reflect changes made based on current needs or abilities. <u>Systemic Correction</u> The educational agency must submit evidence to OEC of written procedures and practices regarding using data to revise IEPs based on changes in student needs or abilities. | <input checked="" type="checkbox"/> Yes The educational agency needs to address this finding in a Corrective Action Plan. |

| Record Review Item | Regulation 34 CFR or OAC | Evidence of Findings | Evidence of Correction | Must be addressed in CAP |
|--------------------|-----------------------------|---|--|---|
| | | | Required Actions | |
| | | <p><u>Other Considerations</u></p> <p>In some cases, IEPs were not amended to address situations in which goals were not met or had not been yet introduced.</p> <p>Wildwood Environmental Academy will need to develop a procedure to ensure all staff members know what is expected when amending or revising a current IEP.</p> <p>Training from SSTs as well as an internal monitoring review system would be very helpful to promote compliance in SDI Amount and Frequency.</p> | | |
| DS-19 | 300.321(5) 3301-51-07(l) | <p><u>Record Review</u></p> <p>One IEP did not indicate that the IEP Team included a group of qualified professionals.</p> | <p><u>Individual Correction</u></p> <p>For the IEP identified as noncompliant, the educational agency must:</p> <ul style="list-style-type: none"> • Provide documentation that the parent was informed prior to the IEP meeting that the person qualified to interpret the instructional implications of evaluation results would not participate in the meeting, and • Provide a written excuse signed by the parents and the educational agency that allowed the person qualified to interpret the instructional implications of evaluation results not to be in attendance at the IEP meeting, or • Reconvene the IEP team to review the IEP with all required members present. <p><u>Systemic Correction</u></p> <p>The educational agency must submit evidence to OEC of written procedures and practices regarding the involvement of people qualified to interpret the instructional implications of evaluation results in the IEP process.</p> | <p><input checked="" type="checkbox"/> No</p> <p>The educational agency does <u>not</u> need to address this finding in a Corrective Action Plan.</p> |

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

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

| Record Review Item | Regulation 34 CFR or OAC | Evidence of Findings | Evidence of Correction | Must be addressed in CAP |
|--------------------|---|---|---|---|
| | | | Required Actions | |
| LRE-1 | 300.114 300.320(a)(5) 3301-51-07 (H)(1)(f) | <p><u>Record Review</u></p> <p>Seven IEPs did not include an explanation of the extent to which the child will not participate with nondisabled children in the general education classroom.</p> <p><u>Interviews</u></p> <p>During interviews, there were inconsistencies reported regarding the understanding of LRE and a continuum of services. Interviews yielded a lack of clarity among staff members as to whether the school functions as an inclusion-only model since students are provided services in a resource room.</p> <p><u>Other Considerations</u></p> <p>Many LRE statements in the records reviewed were vague and did not provide a justification as to why the instruction and services could not be delivered in the general education setting.</p> <p>In some documents, the LRE statement was missing.</p> <p>It is recommended that Wildwood Environmental Academy review and revise their continuum of Services provided to Students with Disabilities. These continuums must be based on the needs of the students. "Resource rooms" were being utilized for those students who were not making progress in inclusion classes however, this was not reflected within the IEP. A student's IEP must state the exact location instruction is being carried out.</p> | <p><u>Individual Correction</u></p> <p>The educational agency must reconvene the teams of the IEPs identified as noncompliant to review and include a justification as to why the child was removed from the general education classroom.</p> <p>The justification should:</p> <ul style="list-style-type: none"> • Be based on the needs of the child, not the disability. • Reflect that the team has given adequate consideration to meeting the student's needs in the general classroom with supplementary aids and services. • Document that the nature or severity of the disability is such that education in general education classes, even with the use of supplementary aids and services, cannot be achieved satisfactorily. • Describe potential harmful effects to the child or others, if applicable. <p><u>Systemic Correction</u></p> <p>The educational agency must submit evidence to OEC of written procedures and practices regarding the least restrictive environment placement decision process.</p> | <p><input checked="" type="checkbox"/> Yes</p> <p>The educational agency needs to address this finding in a Corrective Action Plan.</p> |

Commendations

- At Wildwood Environmental Academy, all kindergarten students are screened for speech and language before the start of the school year. This is done during Preschool. This enables them to “red flag” any future kindergarten students who are “at risk” and provide the kindergarten teacher with some interventions they can start using immediately with those who are having difficulties.
- Administration at Wildwood Environmental Academy has set high expectations for all staff members regarding the services the school will provide.
- Wildwood Environmental Academy has developed a process to ensure parental participation is achieved throughout the special education process, and, as a result, has a high level of parent participation for ETR and IEP meetings.
- Wildwood Environmental Academy has a longevity of staff members. This is likely due to their thorough onboarding process and sense of community within the school.
- At Wildwood Environmental Academy, Tier 3 for Multi-Tier System of Supports is provided for those students who are not receiving special education services.

Recommendations

- Develop and implement a formal process of tracking specially designed instruction to ensure Free Appropriate Public Education (3301-51-07 (K)).