



May 9, 2023

**Winton Woods City School District
IRN: 044081**

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

Introduction

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

Definition of terms in this document:

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

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

Overview

The following report is a summary of the onsite review conducted by the Department on March 14, 15 and 16, 2023, as part of its general supervision requirements under the Individuals with Disabilities Education Act (IDEA) and Am. Sub. H.B.1.

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

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

Onsite reviews are targeted to include the following specific areas:

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

Data Sources

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

1. Parent Input

Winton Woods City School District mailed 627 letters of the Department's notification of review to all families with students with disabilities in the educational agency. The educational agency posted the notification of review on its website which included a link to a recorded presentation from the Department providing an overview of the monitoring review process. The presentation also provides contact information and requests parents to provide comments to the Department regarding the special education program in their school. The notification of review was also posted on the Department's website.

The Department received four comments.



2. Pre-Onsite Data Analysis

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

3. Record Review/IEP Verification

Prior to the onsite visit, the Department consultants reviewed twenty-two (22) records of students with disabilities. The Department consultants selected records of students with disabilities from a variety of disability categories and ages. Ten student records were selected for IEP verification in the classroom setting. During the IEP verifications, OEC staff noticed that students were very engaged in their learning and that staff had developed a good rapport with their students. It was also noted that teachers were very knowledgeable of the students' goals and other needs outlined in the IEPs.

4. Staff/Administrative Interviews

On Tuesday, March 14, the Department consultants held 7 sessions of interviews with 16 administrators and 41 teachers, school counselors, related services personnel, school psychologists, and paraprofessionals. The Department interviews focused on the following review areas: Child Find; Delivery of Services; Least Restrictive Environment (LRE) and IEP alignment and Discipline.

On Wednesday, March 15, the Department consultants held 3 sessions of interviews with 17 teachers. The Department interviews focused on the following review areas: Child Find; Delivery of Services; Least Restrictive Environment (LRE) and IEP alignment and Discipline.

Strengths/Commendations:

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

Many members of the staff mentioned that the Early Childhood Central Campus has implemented a thorough Multi-Tiered System of Supports (MTSS) process. They have developed a flowchart for the process, a referral form, along with providing intervention website resources for teachers.

During record reviews, it was noted that the district had well-documented attempts to obtain parent participation. The PR-01s are very detailed in regard to those who attended and what was discussed during meetings.

During interviews, it was noted that students with disabilities participated in an in-school job program. Many of the interviewees felt that these hands-on experiences were very beneficial for the students.

Findings of Noncompliance/Required Actions

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

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



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

Corrective Action Plan (CAP)

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

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

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

CAP Due Date: September 13, 2023

Department Trainings

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

Completion of LMS Training Modules Due Date: September 13, 2023

Individual Correction

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

Individual Correction Due Date: October 31, 2023

CAP Activities and Systemic Correction

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

Completion of CAP Activities and Systemic Correction Due Date: March 1, 2024

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

For questions regarding the review, please contact: Heather Malone, the Department's IDEA Monitoring Contact, at 614-935-3105, toll-free at (877) 644-6338, or by e-mail at heather.malone@education.ohio.gov.



The Department’s Review Findings and Educational Agency Required Actions

Component 1: Child Find

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

Record Review Item	Evidence of Findings		Evidence of Corrections/Recommendations	Must be addressed in CAP
CF-1	Record Review	<p>34 CFR 300.305(a) [Review of Existing evaluation data] and OAC 3301-51-11 (c)(1)(a) [Preschool children eligible for special education] Preschool records were not reviewed.</p>	<p><u>Individual Correction</u> NA <u>Systemic Correction</u> NA</p>	<input checked="" type="checkbox"/> NA
CF-2	Record Review	<p>OAC 3301-51-06 [Evaluations] Sixteen (16) out of 22, or 80%, evaluations reviewed did not appropriately document interventions provided to resolve concerns for the child performing below grade-level standards.</p>	<p><u>Individual Correction</u> The Department has verified that these students have a current ETR in place, so no additional individual correction is required.</p>	<input checked="" type="checkbox"/> Yes The educational agency needs to address this finding in a Corrective Action Plan.
	Interviews/Public Comments	<p>Interviewees identified a concern that the Multi-Tiered System of Supports (MTSS) process did not yet work as expected, and that referrals for interventions were not always addressed in the same way across the district. There is a district approach being created to strengthen this process that has yet to be fully deployed across all buildings.</p> <p>Many members of the staff mentioned that the Early Childhood Central Campus has implemented a thorough Multi-Tiered System of Supports (MTSS) process. They have developed a flowchart for the process, a referral form, along with providing intervention website resources for teachers.</p>	<p><u>Systemic Correction</u> The educational agency must submit evidence to the Department of written procedures and practices regarding documentation of intervention and supports provided prior to completion of the initial and reevaluation team report.</p> <p><u>Opportunities for Improvement</u> Winton Woods City School District would benefit from creating and implementing a district wide MTSS process that will be established in all buildings. All members of Winton Woods City School District will be trained on the correct implementation of this MTSS process along with monitoring from</p>	



Record Review Item	Evidence of Findings		Evidence of Corrections/Recommendations	Must be addressed in CAP
	Concerns Noted	Although interventions are provided through various processes across the district, the results are not uniformly documented in ETRs. Frequently, the district's initial ETRs did not contain a summary of interventions implemented to include description, intensity, time and results. For reevaluations, if no additional interventions were provided, simply noting that the team agreed the current IEP supports and services are suitable to meet the student's needs will suffice.	administration to provide any additional technical assistance needed. It is recommended that Winton Woods 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.	
CF-3	Record Review	34 CFR 300.501(b) [Parent participation in meetings] and OAC 3301-51-06 (E)(2)(a) [Evaluation procedures]. One out of 20, or 5% of applicable student records reviewed 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.	<input checked="" type="checkbox"/> No The educational agency does <u>not</u> need to address this finding in a Corrective Action Plan.
	Interviews/Public Comments	Discussions focused on ensuring documentation of attempts to secure parent involvement in planning; and in implementing a digital signature process for parents. Interviewees described coordinated efforts to communicate with parents and involve them in their children's educational process wherever possible.	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 the Department of written procedures and practices for obtaining informed parental consent. <u>Opportunities for Improvement</u> The district is using Adobe Sign, which causes a discrepancy in the signature dates. OEC recommended documenting this process in all PR-01s.	



Record Review Item	Evidence of Findings		Evidence of Corrections/Recommendations	Must be addressed in CAP
CF-4	Record Review	<p>34 CFR 300.300 [Parental Consent] Three out of 22, or 14%, student records reviewed did not provide evidence of parental consent obtained prior to new testing.</p>	<p><u>Individual Correction</u> The educational agency must provide evidence that the parent provided informed, written consent for evaluation, based upon the planning form. Or the agency must show documented repeated attempts to obtain informed, written consent to which the parent did not respond. The evidence may include prior written notice, parent invitation, communication log, or other documented attempts to obtain parental informed, written consent.</p> <p><u>Systemic Correction</u> The educational agency must submit evidence to the Department of written procedures and practices for obtaining parental consent obtained prior to new testing or policies and practices for moving forward when parents will not participate.</p> <p><u>Opportunities for Improvement</u> The district is using Adobe Sign, which causes a discrepancy in the signature dates. OEC recommended documenting this process in all PR-01s.</p>	<p><input checked="" type="checkbox"/> No The educational agency does <u>not</u> need to address this finding in a Corrective Action Plan.</p>
	Interviews/Public Comments	<p>It was noted during interviews that Winton Woods currently uses Adobe Sign to collect digital signatures for consent, if needed.</p>		



Record Review Item	Evidence of Findings		Evidence of Corrections/Recommendations	Must be addressed in CAP
CF-5	Record Review	<p>34 CFR 300.304(c)(4) [Other evaluation procedures] OAC 3301-51-01 [Applicability of requirements and definitions] and 3301-51-06 (E)(2)(a) [Evaluation procedures]</p> <p>Twenty-one (21) out of 22, or 95%, evaluations reviewed did not provide evidence that the evaluation addresses all areas related to the suspected disability.</p>	<p><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.</p> <p><u>Systemic Correction</u> The educational agency must submit evidence to the Department of written procedures and practices to provide evidence that the evaluation addresses all areas related to the suspected disability.</p> <p><u>Opportunities for Improvement</u> Winton Woods must develop an internal monitoring process which contains procedures to ensure:</p> <ul style="list-style-type: none"> • Active team participation in the ETR planning process. • Appropriate evaluation data is available; and • Assessments identified on the Planning form are being completed and represented in a Part 1. <p>There is a need to refine the ETR planning and individual evaluator's input process.</p> <p>The district should consider using the assessment title on the planning form when completing a Part 1.</p> <p>Observations are required for all initial and reevaluations. The public agency must ensure that the child is observed in the child's learning environment (including the regular classroom setting) to document the child's academic performance and behavior in the area of difficulty (300.310).</p>	<p><input checked="" type="checkbox"/> Yes</p> <p>The educational agency needs to address this finding in a Corrective Action Plan.</p>
	Interviews/Public Comments	<p>Some respondents described difficulty in obtaining responses for Part 1 from the individuals listed on the planning form.</p> <p>Staff members stated that no guidance has been provided regarding the compliant way for them to complete any Part 1 they were assigned to complete by the School Psychologist.</p>		
	Concerns Noted	<p>In many cases, the ETR planning page listed assessments for the evaluation process that were not included in the ETR Part 1 Individual Evaluators Assessment pages.</p> <p>Review of records indicated that many Part 1s had the assessment title of "Reading, Comprehension, Math, Writing," which made it difficult to determine which assessment area on the Planning Form this was in reference to (data from interventions, classroom-based evaluations, or academic skills). Several records indicated observation as "Additional Testing Needed," but the date, time, and location of the observation were missing.</p>		



Record Review Item	Evidence of Findings		Evidence of Corrections/Recommendations	Must be addressed in CAP
		Several records had multiple persons responsible listed on the planning form, but only one person completed a Part 1.	The district should consider implementing a system of checks and balances to ensure that when more than one person is identified as being responsible for the same assessment, BOTH staff members complete a Part 1 for that assessment.	
CF-6	Record Review	<p>34 CFR 300.306(c) [Procedures for determining eligibility and educational need]</p> <p>Sixteen (16) out of 22, or 73%, evaluations reviewed did not show evidence of clearly stating the summary of assessment results.</p>	<p><u>Individual Correction</u></p> <p>The educational agency will reconvene the ETR teams to conduct a reevaluation and provide a clear and concise summary of the data and assessment conducted that meets the requirements of 3301-51-06 (G) (Summary of information). The IEP team must consider the results of this reevaluation.</p> <p><u>Systemic Correction</u></p> <p>The educational agency must submit evidence to the Department of written procedures and practices regarding summary of data and assessment results.</p> <p><u>Opportunities for Improvement</u></p> <p>Winton Woods has an opportunity to develop an internal practice that will monitor the completion of the Part 2 Summary of the Evaluation Team Report so that all areas assessed in a Part 1 Individual Evaluator's Assessment are summarized in the Part 2 summary. This is an opportunity for professional development and/or targeted technical assistance from SST staff.</p>	<p><input checked="" type="checkbox"/> Yes</p> <p>The educational agency needs to address this finding in a Corrective Action Plan.</p>
	Interviews/Public Comments	Through interviews, staff shared that the ETR process is not consistent throughout the district. Interviewees indicated a lack of consistency in getting quality information. They would like more time spent on training. Some staff members stated that they do not have access to SameGoal.		
	Concerns Noted	The information from Part 1 was not summarized in a clear and concise manner in Part 2. In some instances, the information was entirely omitted without explanation. 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.		



Record Review Item	Evidence of Findings		Evidence of Corrections/Recommendations	Must be addressed in CAP
CF-7	Record Review	<p>34 CFR 300.306(c) [Procedures for determining eligibility and educational need] Fourteen (14) out of 22, or 64%, evaluation team reports reviewed did not contain a clear and succinct description of educational needs.</p>	<p><u>Individual Correction</u> The educational agency will reconvene the ETR teams to conduct a reevaluation and provide a clear and succinct description of the student's educational needs. The IEP team must consider the results of this reevaluation.</p>	<p><input checked="" type="checkbox"/> Yes The educational agency needs to address this finding in a Corrective Action Plan.</p>
	Interviews/Public Comments	<p>Through interviews, it appeared that there has been some professional development on writing Part 1s, but there is still some confusion regarding what kind of data to include for all three required components.</p>	<p><u>Systemic Correction</u> The educational agency must submit evidence to the Department of written procedures and practices regarding description of educational needs.</p>	
	Concerns Noted	<p>Some ETRs did not include all the needs identified in Part 1 and were not summarized in Part 2.</p>	<p><u>Opportunities for Improvement</u> Winton Woods has an opportunity to develop an internal practice that will monitor the completion of the Part 2 Summary of the Evaluation Team Report so that all areas assessed in a Part 1 Individual Evaluator's Assessment are summarized in the Part 2 summary. This is an opportunity for professional development and/or targeted technical assistance from SST staff.</p>	
CF-8	Record Review	<p>34 CFR 300.306(c) [Procedures for determining eligibility and educational need] Nine out of 22, or 41%, evaluation team reports reviewed did not contain specific implications for instruction.</p>	<p><u>Individual Correction</u> The educational agency will reconvene the ETR teams to conduct a reevaluation and provide a clear description of specific implications for instruction. The IEP team must consider the results of this reevaluation.</p>	<p><input checked="" type="checkbox"/> Yes The educational agency needs to address this finding in a Corrective Action Plan.</p>
	Interviews/Public Comments	<p>Through interviews, it appeared that there has been some professional development on writing Part 1s, but there is still some confusion regarding what kind of data to include for all three required components.</p>	<p><u>Systemic Correction</u> The educational agency must submit evidence to the Department of written procedures and practices regarding implications for instruction.</p>	



Record Review Item	Evidence of Findings		Evidence of Corrections/Recommendations	Must be addressed in CAP
	Concerns Noted	In some records, implications for instruction were stated in Part 1 but were not included into the Part 2 summary.	<p><u>Opportunities for Improvement</u></p> <p>Winton Woods has an opportunity to develop an internal practice that will monitor the completion of the Part 2 Summary of the Evaluation Team Report so that all areas assessed in a Part 1 Individual Evaluator’s Assessment are summarized in the Part 2 summary. This is an opportunity for professional development and/or targeted technical assistance from SST staff.</p>	
CF-9	Record Review	<p>34 CFR 300.306(a)(1) [Determination of eligibility] OAC 3301-51-01 (B)(21) [Applicability of requirements and definitions]</p> <p>Seven out of 22, or 32%, evaluations reviewed did not show evidence that a group of qualified professionals, as appropriate to the suspected disability, were involved in determining whether the child is a child with a disability as well as the child’s educational needs.</p>	<p><u>Individual Correction</u></p> <p>The educational agency must provide evidence that the ETR teams and other qualified professionals, as appropriate, participated in the determination of eligibility and educational needs. If not, the ETR team must reconvene and provide the Department evidence of group participation.</p>	<input checked="" type="checkbox"/> Yes The educational agency needs to address this finding in a Corrective Action Plan.
	Interviews/Public Comments	Several staff members indicated they were not actively involved in some of the ETR meetings and that they had little say in the assessments or outcomes for their students. General education teachers were sometimes absent during the planning meeting and/or ETR meeting.	<p><u>Systemic Correction</u></p> <p>The educational agency must submit evidence to the Department of written procedures and practices regarding the eligibility determination process.</p>	
	Concerns Noted	Review of records indicated that required members of the team were often not present at the ETR meeting.	<p><u>Opportunities for Improvement</u></p> <p>It is recommended Winton Woods develop a procedure of checks and balances to ensure all members of the Planning/ETR team are in attendance for the entire length of these meetings. Training is also recommended to provide the district with the knowledge of legal responsibilities regarding the “excusal” of certain team members as well and who is required to attend these meetings.</p>	



Record Review Item	Evidence of Findings		Evidence of Corrections/Recommendations	Must be addressed in CAP
CF-10	Record Review	<p><i>OAC 3301-51-01 (B)(10) [Definitions] and 3301-51-06 [Evaluations]</i> Fourteen out of 22, or 64%, evaluations reviewed did not provide a justification for the eligibility determination decision.</p>	<p><u>Individual Correction</u> The educational agency will reconvene the ETR teams to conduct a reevaluation and provide a clear justification for the eligibility determination.</p> <p><u>Systemic Correction</u> The educational agency must submit evidence to the Department of written procedures and practices regarding the eligibility determination decision.</p> <p><u>Opportunities for Improvement</u> The educational agency would benefit from professional development by State Support Team on how to write a compliant justification statement for the disability determination.</p>	<p><input checked="" type="checkbox"/> Yes The educational agency needs to address this finding in a Corrective Action Plan.</p>
	Interviews/Public Comments	<p>Staff indicated they could use additional training to understand how to write a compliant justification statement for the disability determination.</p>		
	Concerns Noted	<p>When reviewing records, it was noted that the justification often did not include how the student's disability affects the child's access to and progress in the general education curriculum.</p>		



Component 2: Delivery of Services

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

Record Review Item	Evidence of Findings		Evidence of Correction/Recommendations	Must be addressed in CAP
DS-1	Record Review	<p>SPP Indicator 13 34 CFR 300.320(b) [Transition services] OAC 3301-51-07 (H)(2) [Definition of individualized education program]</p> <p>Eight out of 12 applicable IEPs reviewed, or 80%, did not show evidence that the postsecondary transition plan met all eight required elements of the IDEA for the student, specifically in the following area(s):</p> <ol style="list-style-type: none"> 1. There are appropriate measurable postsecondary goal(s). 2. The postsecondary goals are updated annually. 3. The postsecondary goals were based on age appropriate transition assessment (AATA). 4. There are transition services that will reasonably enable the student to meet the postsecondary goal(s). 5. The transition services include courses of study that will reasonably enable the student to meet the postsecondary goal(s). 6. The annual goal(s) are related to the student's transition service needs. 7. There is evidence the student was invited to the IEP Team Meeting where transition services were discussed. 8. When appropriate, there is evidence that a representative of any participating agency was invited to the IEP Team Meeting. 	<p><u>Individual Correction</u> 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> The educational agency must submit evidence to the Department of written procedures and practices regarding transition services.</p> <p><u>Opportunities for Improvement</u> 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. Training must be provided to all ETR and IEP members responsible for assessing and writing transition plans to ensure they are compliant and beneficial to the student.</p>	<p><input checked="" type="checkbox"/> Yes</p> <p>The educational agency needs to address this finding in a Corrective Action Plan.</p>



Record Review Item	Evidence of Findings		Evidence of Correction/Recommendations	Must be addressed in CAP
	Interviews/Public Comments	During IEP Verifications and interviews, district staff on all levels seemed to be very knowledgeable and proactive regarding post-secondary transition programming. This, however, did not translate into student records. Reviewers noted that when this section of the record was compliant, they were only minimally compliant and did not truly represent available supports and services.		
	Concerns Noted	<p>Students must be invited to attend their own IEP meeting when transition planning is being considered, starting at age 14 or younger, if appropriate.</p> <p>In some instances, the Education/Training goal was the same as the Employment goal.</p> <p>Courses of Study must include either Ohio Learning Standards or Ohio Standards Extended.</p>		
DS-2	Record Review	<p>34 CFR 300.320(a)(1) [Definition of individualized education program]</p> <p>Nineteen (19) out of 22, or 86%, IEPs reviewed did not contain Present Levels of Academic Achievement and Functional Performance (PLOP) that addressed the needs of the student.</p>	<p><u>Individual Correction</u></p> <p>Present Levels of Performance must include the following information as it relates to each goal:</p> <ul style="list-style-type: none"> • Summary of current daily academic/behavior and/or functional performance compared to expected grade-level standards or to expected age-appropriate performance in order to provide a frame of reference for annual goal development in the specific area of academic and/or functional need; • Baseline data provided for developing a measurable goal (for example, ETR results, if current, formative academic assessments, curriculum-based 	<input checked="" type="checkbox"/> Yes The educational agency needs to address this finding in a Corrective Action Plan.
	Interviews/Public Comments	Interview respondents described professional development given for collecting information and developing present levels; however, the deployment of processes across the district appeared to be inconsistent.		



Record Review Item	Evidence of Findings		Evidence of Correction/Recommendations	Must be addressed in CAP
	Concerns Noted	<p>In many cases, baseline data to identify present levels did not match the goal measurements. In other instances, the present levels contained too much other information that distracted from the focus on student needs and important baseline data.</p>	<p>measurements, transition assessments or functional behavior assessments);</p> <ul style="list-style-type: none"> Current performance measurement directly relates to the goal measurement. <p><u>Systemic Correction</u> The educational agency must submit evidence to the Department of written procedures and practices regarding the review of current academic/functional data when writing IEPs.</p> <p><u>Opportunities for Improvement</u> There is an opportunity for professional development and/or targeted technical assistance in developing Present Levels of Academic Achievement and Functional Performance (PLOP) that clearly address the needs of the student.</p>	
DS-3	Record Review	<p>34 CFR 300.320(a)(2)(i) [Definition of individualized education program]</p> <p>Fourteen (14) out of 22, or 64%, IEPs reviewed did not contain measurable annual goals.</p>	<p><u>Individual Correction</u> The educational agency must reconvene the teams of the IEPs identified as noncompliant to review and amend annual goals to contain the following critical elements:</p> <ol style="list-style-type: none"> Clearly <u>defined behavior</u>: the specific action the child will be expected to perform. The <u>condition</u> (situation, setting or given material) under which the behavior is to be performed. <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> The educational agency must submit evidence to the Department of written procedures and practices</p>	<p><input checked="" type="checkbox"/> Yes</p> <p>The educational agency needs to address this finding in a Corrective Action Plan.</p>
	Interviews/Public Comments	<p>Although most respondents indicated familiarity with the required elements for annual IEP goals, there is still a need for further training and technical assistance in this area.</p>		
	Concerns Noted	<p>Measurable goals in the IEPs reviewed were often missing one or more required elements. An internal monitoring and review system would be very helpful to promote compliance in annual IEP goals.</p>		



Record Review Item	Evidence of Findings		Evidence of Correction/Recommendations	Must be addressed in CAP
			<p>regarding the development of measurable annual IEP goals.</p> <p><u>Opportunities for Improvement</u></p> <p>There is an opportunity for professional development and targeted technical assistance in writing compliant measurable annual goals.</p>	
DS-4	Record Review	<p>34 CFR 300.320(a)(2)(i) [Definition of individualized education program]</p> <p>Six out of 18 appiccate IEPs reviewed, or 33%, did not contain annual goals that address the child's academic area(s) of need.</p>	<p><u>Individual Correction</u></p> <p>The educational agency must reconvene the teams of the IEPs identified as noncompliant to review and amend the IEP. Annual goals must address the academic needs of the child unless the team provides evidence that the goals were prioritized based on the severity of the needs of the child.</p> <p><u>Systemic Correction</u></p> <p>The educational agency must submit evidence to the Department of written procedures and practices regarding the IEP process of addressing identified academic needs.</p> <p><u>Opportunities for Improvement</u></p> <p>There is an opportunity for professional development and targeted technical assistance in documenting academic needs mentioned in the ETR. If academic needs were listed in the ETR or IEP profile as being an area of concern, they must be addressed in the IEP in some capacity. The academic need can either be addressed through services and/or supports or a statement that indicates the team has prioritized needs or found that it is not an area of concern at this time.</p>	<p><input checked="" type="checkbox"/> Yes</p> <p>The educational agency needs to address this finding in a Corrective Action Plan.</p>
	Interviews/Public Comments	<p>Although most respondents indicated familiarity with identifying academic needs within the ETR, there is still a need for further training and technical assistance in this area.</p>		
	Concerns Noted	<p>Academic needs were mentioned in several ETRs as being an area of need but were not addressed in the IEP or were not noted as not a priority at this time.</p>		



Record Review Item	Evidence of Findings		Evidence of Correction/Recommendations	Must be addressed in CAP
DS-5	Record Review	<p>34 CFR 300.320(a)(2)(i) [Definition of individualized education] Four out of 17 applicable IEPs reviewed, or 24%, did not contain annual goals that address the child’s functional area(s) of need.</p>	<p><u>Individual Correction</u> The educational agency must reconvene the teams of the IEPs identified as noncompliant to review and amend the IEP. Annual goals must address the functional needs of the child unless the team provides evidence that the goals were prioritized based on the severity of the needs of the child.</p> <p><u>Systemic Correction</u> The educational agency must submit evidence to the Department of written procedures and practices regarding the IEP process of addressing identified functional needs.</p> <p><u>Opportunities for Improvement</u> There is an opportunity for professional development and targeted technical assistance in documenting functional needs mentioned in the ETR. If functional needs were listed in the ETR or IEP profile as being an area of concern, they must be addressed in the IEP in some capacity. The functional need can either be addressed through services and/or supports or a statement that indicates the team has prioritized needs or found that it is not an area of concern at this time.</p>	<p><input checked="" type="checkbox"/> No The educational agency does <u>not</u> need to address this finding in a Corrective Action Plan.</p>
DS-6	Record Review	<p>34 CFR 300.320(a)(4) [Definition of individualized education program] OAC 3301-51-07 (H)(1)(e)(i) [Definition of IEP] Sixteen (16) out of 22, or 73%, IEPs reviewed did not contain a statement of specially designed instruction including related services that address the individual needs of the child and supports the annual goals.</p>	<p><u>Individual Correction</u> The educational agency must reconvene the teams of the IEPs identified as noncompliant to review and amend the specially designed instruction, as appropriate, to address the needs of the child.</p> <p><u>Systemic Correction</u> The educational agency must submit evidence to the Department of written procedures and practices</p>	<p><input checked="" type="checkbox"/> Yes The educational agency needs to address this finding in a Corrective Action Plan.</p>



Record Review Item	Evidence of Findings		Evidence of Correction/Recommendations	Must be addressed in CAP
	Interviews/Public Comments	Although most respondents indicated familiarity with the required elements for SDI components, there is still a need for further training and technical assistance in this area.	<p>regarding the IEP process of determining specially designed instruction.</p> <p><u>Opportunities for Improvement</u></p> <p>It is recommended that professional development in the area of writing compliant SDI be provided by the State Support Team.</p> <p>An internal monitoring and review system would be very helpful to promote compliance in this area.</p>	
	Concerns Noted	<p>In some classrooms, no SDI was observed being delivered during IEP verifications.</p> <p>Review of records indicated that the SDI statement was missing instructional levels and specific skills to describe how the SDI differs from the general education instruction.</p>		
DS-7	Record Review	<p><i>34 CFR 300.320(a)(7) [Definition of individualized education program]</i> <i>OAC 3301-51-07 (H)(1)(i) [Definition of IEP]</i></p> <p>Two out of 22, or 9%, IEPs reviewed did not indicate the specific location where the specially designed instruction will be provided.</p>	<p><u>Individual Correction</u></p> <p>The educational agency must reconvene the teams of the IEPs identified as noncompliant to review and amend the location where the specially designed instruction will be provided.</p> <p><u>Systemic Correction</u></p> <p>The educational agency must submit evidence to the Department of written procedures and practices regarding the IEP process of determining the location where specially designed instruction will occur.</p> <p><u>Opportunities for Improvement</u></p> <p>An internal monitoring and review system would be very helpful to promote compliance in this area.</p>	<p><input checked="" type="checkbox"/> No</p> <p>The educational agency does <u>not</u> need to address this finding in a Corrective Action Plan.</p>
	Interviews/Public Comments	<p>Many interviewees mentioned that scheduling is affecting the delivery of students' SDI. Interviewees stated that transitions to leave the classroom for SDI take up a lot of instructional time.</p> <p>Although interviewees reported positive working relationships, there is a lack of space in buildings for specially designed instruction to take place.</p> <p>It was also noted that students are being pulled for SDI during instructional time.</p> <p>Although most respondents indicated familiarity with the required elements for SDI components, there is still a need for further training and technical assistance in this area.</p>		



Record Review Item	Evidence of Findings		Evidence of Correction/Recommendations	Must be addressed in CAP
DS-8	Record Review	<p>34 CFR 300.320(a)(7) [Definition of individualized education program] OAC 3301-51-07 (H)(1)(i) [Definition of IEP]</p> <p>One out of 22, or 5%, IEPs reviewed did not indicate the amount of time and frequency of the specially designed instruction.</p>	<p><u>Individual Correction</u> The educational agency must reconvene the teams of the IEPs identified as noncompliant to review and amend the amount of time and frequency of the specially designed instruction.</p> <p><u>Systemic Correction</u> The educational agency must submit evidence to the Department of written procedures and practices regarding the IEP process of determining the amount and frequency of specially designed instruction to be provided.</p> <p><u>Opportunities for Improvement</u> Winton Woods should consider developing some formal process to ensure that all intervention specialists are delivering their required specially designed instruction to their students as it is written in the student's IEP.</p>	<p><input checked="" type="checkbox"/> No</p> <p>The educational agency does <u>not</u> need to address this finding in a Corrective Action Plan.</p>
	Interviews/Public Comments	<p>Some interviewees stated that due to the requirement of a specific number of minutes for certain academic areas and assigned students with disabilities being spread across multiple home rooms, it is difficult to make a schedule for the assigned SDI minutes.</p>		
DS-9	Record Review	<p>34 CFR 300.324(a)(2)(v) [Development of IEP] OAC 3301-51-01(B)(3) [Applicability of requirements and definitions]</p> <p>All applicable IEPs reviewed identified assistive technology to enable the child to be involved and make progress in the general education curriculum.</p>	<p><u>Individual Correction</u> NA</p> <p><u>Systemic Correction</u> NA</p>	<p><input checked="" type="checkbox"/> NA</p>



Record Review Item	Evidence of Findings		Evidence of Correction/Recommendations	Must be addressed in CAP
DS-10	Record Review	<p>34 CFR 300.320(a)(6)(i) [Definition of individualized education] OAC 3301-51-07 (H)(1)(g) [Definition of IEP]</p> <p>Fifteen (15) out of 20 applicable IEPs reviewed, or 75%, did not identify accommodations provided to enable the child to be involved and make progress in the general education curriculum.</p>	<p><u>Individual Correction</u> The educational agency must reconvene the teams of the IEPs identified as noncompliant to review the accommodations that would directly assist the child to access the course content without altering the scope or complexity of the information taught and include them on the IEP.</p> <p><u>Systemic Correction</u> The educational agency must submit evidence to the Department of written procedures and practices regarding accommodations.</p> <p><u>Opportunities for Improvement</u> Training from SSTs as well as an internal monitoring review system would be very helpful to promote compliance in the areas of accommodations.</p>	<p><input checked="" type="checkbox"/> Yes</p> <p>The educational agency needs to address this finding in a Corrective Action Plan.</p>
	Interviews/Public Comments	<p>Although most respondents indicated familiarity with accommodations, there is still a need for further training and technical assistance in the area of the components required.</p>		
	Concerns Noted	<p>The condition(s) and/or extent were not clearly explained (who provided the services and when and where those services were provided).</p>		
DS-11	Record Review	<p>34 CFR 300.320(a)(4) [Definition of individualized education program] OAC 3301-51-07 (H)(1)(e) [Definition of IEP]</p> <p>Eleven out of 14 applicable IEPs reviewed, or 79%, did not identify modifications to enable the child to be involved and make progress in the general education curriculum.</p>	<p><u>Individual Correction</u> The educational agency must reconvene the teams of the IEPs identified as noncompliant to review the modifications that would alter the amount or complexity of grade-level materials and would enable the child to be involved and make progress in the general education curriculum and include them in the IEP.</p> <p><u>Systemic Correction</u> The educational agency must submit evidence to the Department of written procedures and practices regarding modifications.</p> <p><u>Opportunities for Improvement</u> This area is an opportunity for professional development and/or targeted technical assistance to address the use of modifications. A modification is</p>	<p><input checked="" type="checkbox"/> Yes</p> <p>The educational agency needs to address this finding in a Corrective Action Plan.</p>
	Interviews/Public Comments	<p>Although most respondents indicated familiarity with modifications, there is still a need for further training and technical assistance in the area of the components required.</p>		
	Concerns Noted	<p>During record reviews, it was noted that the extent of and conditions for modifications were not explained.</p>		



Record Review Item	Evidence of Findings		Evidence of Correction/Recommendations	Must be addressed in CAP
			when the amount of content that students are expected to learn, 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.	
DS-12	Record Review	<p>34 CFR 300.320(a)(4) [Definition of individualized education program] OAC 3301-51-07 (H)(1)(e) [Definition of IEP] All applicable IEPs reviewed identified supports for school personnel to enable the child to be involved and make progress in the general education curriculum.</p>	<p><u>Individual Correction</u> NA</p> <p><u>Systemic Correction</u> NA</p>	☒ NA
	Interviews/Public Comments	Some interviewees indicated the need to be made aware of specific medical, physical, and academic background information on students that are assigned to them.		
DS-13	Record Review	<p>OAC 3301-51-07 (H)(1)(h)(ii) [Definition of IEP] One out of one applicable student record reviewed, or 100%, did not have a justification statement explaining why the student cannot participate in the regular assessment and why the alternate assessment is appropriate for the student.</p>	<p><u>Individual Correction</u> The educational agency must reconvene the teams of the IEPs identified as noncompliant to review and determine if the alternate assessment is appropriate for the student.</p> <p><u>Systemic Correction</u> The educational agency must submit evidence to the Department of written procedures and practices regarding the determination of participation in the AASCD</p> <p><u>Opportunities for Improvement</u> The educational agency would benefit from professional development by State Support Team on how to write a compliant justification statement for the disability determination.</p>	☒ Yes The educational agency needs to address this finding in a Corrective Action Plan.
	Concerns Noted	Provide a statement that describes why the child cannot participate in the regular assessment or how the Alternate Assessment is appropriate for the student, not simply scores from a previous test.		



Record Review Item	Evidence of Findings		Evidence of Correction/Recommendations	Must be addressed in CAP
DS-14	Record Review	<p><i>OAC 3301-51-07(L)(2) [Development, review and revision of IEP]</i></p> <p>Seventeen (17) out of 20 applicable student records reviewed, or 85%, did not show evidence of progress reporting data collected and analyzed to monitor performance on each goal.</p>	<p><u>Individual Correction</u></p> <p>None</p> <p><u>Systemic Correction</u></p> <p>The educational agency must submit evidence to the Department of written procedures and practices regarding measurable annual goals and services consistent with progress made.</p> <p><u>Opportunities for Improvement</u></p> <p>Even though progress was being gathered and reported, it must be recorded using the same performance criteria defined in the annual measurable goal. Progress Reports on annual measurable goals must be provided to parents of a child with a disability at least as often as report cards are issued to all children. If the district provides interim reports to all children, progress reports must be provided to all parents of a child with a disability.</p>	<p><input checked="" type="checkbox"/> Yes</p> <p>The educational agency needs to address this finding in a Corrective Action Plan.</p>
	Interviews/Public Comments	<p>Although most respondents indicated familiarity with the required elements for progress monitoring, there is still a need for further training and technical assistance in this area.</p>		
	Concerns Noted	<p>During record reviews, it was found that many records did not include quantitative and qualitative data on the actual goal. Progress was only reported on the objectives.</p> <p>Progress on goals should be reported in alignment to the measurement used in the annual goal statement.</p> <p>Many current progress reports were missing when records were uploaded for our review; therefore, it was difficult to determine if an amendment may have been warranted.</p>		
DS-15	Record Review	<p><i>OAC 3301-51-07(L) [Development, review and revision of IEP]</i></p> <p>The two applicable IEPs reviewed 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>	<p><input checked="" type="checkbox"/> NA</p>



Record Review Item	Evidence of Findings		Evidence of Correction/Recommendations	Must be addressed in CAP
DS-16	Record Review	<p>34 CFR 300.321(5) [IEP team] OAC 3301-51-07(I) [IEP team]</p> <p>Two out of 22, or 9%, IEPs reviewed did not indicate that the IEP Team included a group of qualified professionals.</p>	<p><u>Individual Correction</u></p> <p>For the IEPs identified as noncompliant, the educational agency must</p> <ul style="list-style-type: none"> • Provide evidence that the IEP team, including the parent, participated in the IEP meeting; or • Provide evidence that the educational agency made reasonable attempts to include the parent in the IEP meeting; and/or • Provide documentation that the parent and the educational agency consent, in writing, to excuse the required member prior to the IEP meeting; or • Reconvene the IEP team to review the IEP with all required members present. <p><u>Systemic Correction</u></p> <p>The educational agency must submit evidence to the Department of written procedures and practices regarding the involvement of all required team members, including the parent, in IEP meetings.</p> <p><u>Opportunities for Improvement</u></p> <p>An internal monitoring and review system would be very helpful to promote compliance.</p>	<p><input checked="" type="checkbox"/> No</p> <p>The educational agency does <u>not</u> need to address this finding in a Corrective Action Plan.</p>
	Interviews/Public Comments	<p>Some interviewees stated that the district makes every effort to include the district representative, intervention specialist, general education teacher, and the parent in the meeting.</p>		



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

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

Record Review Item	Evidence of Findings		Evidence of Correction/Recommendations	Must be addressed in CAP
LRE-1	Record Review	<p>34 CFR 300.114 [LRE requirements] and 300.320(a)(5) [Definition of individualized education program] OAC 3301-51-07 (H)(1)(f) [Definition of individualized education program]</p> <p>Two out of 22, or 9%, IEPs reviewed did not include an explanation of the extent to which the child will not participate with nondisabled children in the general education classroom.</p>	<p><u>Individual Correction</u></p> <p>The educational agency must reconvene the teams of the IEPs identified as noncompliant to review and include a justification as to why the child was removed from the general education classroom.</p> <p>The justification should:</p> <ul style="list-style-type: none"> • Be based on the needs of the child, not the disability. • Reflect that the team has given adequate consideration to meeting the student’s needs in the general classroom with supplementary aids and services. • Document that the nature or severity of the disability is such that education in general education classes, even with the use of supplementary aids and services, cannot be achieved satisfactorily. • Describe potential harmful effects to the child or others, if applicable. <p><u>Systemic Correction</u></p> <p>The educational agency must submit evidence to the Department of written procedures and practices regarding the least restrictive environment 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>



Additional Considerations and Opportunities for Improvement

Many areas of the records reviewed contained information that appeared to have been copied and pasted into the boxes, which caused wording to be cut off. For this reason, the reader is unable to review all information. The district should consider refining the individual evaluator's input process.

Through interviews, it was noted that there is a formal process for out-of-state transfers; however, record reviews indicated that some of the Ohio's required ETR and IEPs components were missing. It is highly recommended that the district review and revise their process for out-of-state transfers to include utilizing Ohio's required forms.

The district should consider providing professional development in the co-plan to co-serve model. This could be achieved by allowing staff to observe exemplary co-teaching model classrooms within the district.

The continuum of alternative placements did not appear to be available across all grade levels and settings. Winton Woods will need to revise and add to their continuum of alternative placements, under rule 3301-51-09 Delivery of Services (C), to ensure that a continuum of alternative placements is available to meet the needs of children with disabilities for special education and related services.

Although Positive Behavior Intervention Supports have recently been implemented, it was noted during interviews that the district continues to have discipline issues. The district would benefit from the following:

- creating a crisis team.
- developing tracking forms regarding how the school tracks/documents when and how long a student is in the sensory room.
- reviewing and revising restraint and seclusion policies at the beginning of each year.
- providing district-wide training.

Winton Woods should highly consider developing and implementing a formal process of tracking specially designed instruction (SDI) to ensure Free Appropriate Public Education [OAC 3301-51-07 (K)].

Staff concerns need to be resolved in a timely manner especially when it involves student safety. It is recommended that the district review and review its Emergency Operations Plan.

The district should consider rearrangement of how SDI is being delivered for students. Scheduling is affecting delivery of SDI. Due to inconsistency of scheduling across district buildings, many students are not receiving SDI as written in the student's IEP.

Due to the high number of English Learners who also qualify for special education services, the district should consider working with the ODE Office of Whole Child Supports to review and revise their procedures for serving these students.

It is highly recommended Winton Woods provide all staff members, including paraprofessionals, training on serving high need students such as students with multiple disabilities, emotional disturbance and autism.

The district would benefit from creating policies, procedures and practices regarding criteria for students referred to the Warrior Success and Project Success programs and returning back to the home building.

It was noted during IEP verifications that students were in the resource room more than what is listed in the IEP. It is recommended that the district review SDI locations to ensure the IEP accurately reflects where the students are receiving their services. An internal monitoring and review system would be very helpful to promote compliance in this area.