



## **Executive Summary Of the Compliance Monitoring Review of the EMO SD**

### **PART I SUMMARY OF FINDINGS**

#### **A. Review Process**

Prior to the Bureau's monitoring the week of 3/6/2007, the EMO SD was formally notified of the dates the onsite review would be conducted. Notice and invitation to comment was also provided to the Local Task Force on Right-to-Education. The school district was informed of its responsibility to compile various reports, written policies, and procedures to document compliance with requirements.

While onsite, the monitoring team employed a variety of techniques to gain an in depth understanding of the district's program operations. These techniques included:

- Interviews of district administrative and clinical staff (Interview of School District Personnel)
- Review of policies, notices, plans, special education forms and formats, and data reports used and compiled by the district (Facilitated Self-Assessment)
- Comprehensive case studies (including interviews of regular and special education staff, interviews of parents, and student file reviews) of students.

#### **B. General Findings**

In reaching compliance determinations, Bureau of Special Education monitoring teams apply criteria contained in federal and state special education regulations. Specifically, these are:

- Individuals with Disabilities Education Improvement Act of 2004
- 22 Pa. Code Chapter 14 (State Board of Education Special Education Regulations)
- 34 CFR Part 300

#### **Commendations**

In addition to reporting the status of compliance the Bureau of Special Education wishes to recognize the EMO SD for the following:

- The district is commended for its adoption of a new system that resulted in improved content and quality of IEPs.
- The Rhodes Middle School is commended for the quality of its instructional program and its expanded efforts to include students in regular education.

- The Kinsey School is commended for establishing an outstanding progress monitoring system and an excellent learning environment school wide.
- The Sulzberger School is commended for its full-inclusion program and welcome and nurturing school climate.

This report focuses on compliance with requirements and also contains some descriptive information (such as interview results) which is intended to provide feedback to assist in program planning.

**C. Overall Findings of the Three Major Sections of the Compliance Monitoring Instrument**

**1. FACILITATED SELF-ASSESSMENT**

The team reviewed the FSA submitted by the school district and conducted on-site verification activities of the information submitted in the FSA. The on-site verification activities included review of policies, notices, procedures, and school district file reviews.

<b>FSA</b>	<b>In Compliance</b>	<b>Out of Compliance</b>
Assistive Technology and Services; Hearing Aids	2	0
Behavior Support Policy	1	0
Child Find (Annual Public Notice and General Dissemination Materials)	1	0
Confidentiality	1	0
Dispute Resolution	1	0
Graduation and Drop Out Rates	2	0
Exclusions: Suspensions and Expulsions	1	0
Facilities Used for Special Education	1	0
Independent Education Evaluation	1	0
Least Restrictive Environment (LRE)	3	2
Parent Training	1	0
PSSA and PASA (PA System of Student Assessment and PA Alternate System of Assessment)	1	0
Public School Enrollment	2	0
Surrogate Parents (Students Requiring)	1	0
Training	1	0
Intensive Interagency Approach	1	0

**2. FILE REVIEW** (Student case studies)

The education records of randomly selected students participating in special education programs were studied to determine whether the district complied with essential requirements in six areas.

The status of compliance of the EMO SD is as follows:

<b>Sections of the FILE REVIEW</b>	<b>In Compliance</b>	<b>Out of Compliance</b>	<b>NA</b>
Essential Student Documents Are Present and Were Prepared Within Timelines	205	53	92
Evaluation/Reevaluation: Process and Content	652	168	1280
Individualized Education Program: Process and Content	1176	102	672
<b>TOTALS</b>	<b>2033</b>	<b>323</b>	<b>2044</b>

**3. TEACHER AND PARENT INTERVIEWS**

Interviews were conducted with parents and teachers of students selected by the BSE for the sample group. The goal is to determine if the Local Education Agency (LEA) involves parents and professionals in required processes (e.g., Evaluation, IEP development...), whether programs and services are being provided, and whether the LEA provides training to enhance knowledge. Parent and teacher satisfaction with the special education program is also generally assessed.

	<b># Yes Responses</b>	<b># No Responses</b>	<b># of Other Responses</b>
Program Implementation: Regular Ed Teacher Interviews	315	9	19
Program Implementation: Special Ed Teacher Interviews	600	22	177
Program Implementation: Parent Interviews	79	13	40
<b>TOTALS</b>	<b>994</b>	<b>44</b>	<b>236</b>

**4. STUDENT INTERVIEWS**

Results of the student interviews are reflected on the Corrective Action Verification document.

**PART II  
CORRECTIVE ACTION PROCESS**

PART I of this report presented an overall summary of findings in each major area reviewed by the team. In the Appendix to the report, we have provided you with detailed findings for each of the 147 criteria of the 3 major sections of the compliance monitoring instrument, i.e. FSA, File Review, and Parent and Teacher Interviews. The detailed report of findings in the Appendix includes:

- Criteria Number
- Statements of all requirements
- Whether each requirement was met, was not met, or was not applicable
- Statements of corrective action required for those criteria not met

Upon receipt of this report, the school district should review the corrective actions required. The Report is formatted so that findings from all components of the monitoring are consolidated by topical area. The Report lists the finding, and whether corrective action is required. For certain types of findings, corrective

action will be prescribed, and will not vary from LEA to LEA. For example, if the finding is that the LEA lacks a specific required policy, it is reasonable to have the BSE prescribe a standardized remedy and timeline for correcting this deficiency. However, the majority of corrective action activities will be individually designed by the LEA based on their own unique circumstances and goals. The Single Point of Contact (SPOC) will schedule an on-site visit with the LEA within 60 days following issuance of the monitoring report. The SPOC, LEA, and PaTTAN staff will develop an LEA Compliance Plan for corrective action. The LEA will recommend a corrective action strategy and timeline. PaTTAN and IU CSPD staff is available to assist the LEA. The LEA proposes corrective action activities and the SPOC and LEA mutually agree upon the Compliance Plan for Corrective Action. The SPOC will confirm and submit a PDE approved LEA improvement plan. With respect to the File Review, because students were selected at random, findings are generalized to the entire population of exceptional students. During the corrective action review, the SPOC will select students at random and not focus on those students in the original sample. Consequently, the district should approach corrective action on a systemic basis. One exception is found in #64. If there has been a finding of noncompliance regarding the appropriateness or implementation of an individual student's program, the individual students are identified by student number and, because of the significance of the provision of a free appropriate public education (FAPE) to these students, the district must take immediate, individual corrective action.

Upon conclusion of the corrective action process, the school district will be notified of its successful completion of the monitoring process.