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June 20, 2008

Dr. Dennis Thompson, Superintendent
Collier County School District
5775 Osceola Trail
Naples, Florida 34109-0919

Dear Dr. Thompson:

The Bureau of Exceptional Education and Student Services is in receipt of your district's response to the preliminary findings of its Exceptional Student Education (ESE) Compliance Self-Assessment. This letter and the attached document(s) comprise the final report for Collier County School District's 2007-08 ESE monitoring.

The self-assessment system is designed to address the major areas of compliance related to the State Performance Plan (SPP). SPP Indicator 15, Timely Correction of Noncompliance, requires that the state identify and correct noncompliance **as soon as possible, but no later than one year from identification.**

As indicated in prior communication with district ESE staff, it was anticipated that there might be an increase in the number of findings of noncompliance over previous monitoring activities due to the design of the self-assessment protocols and sampling system. While any incident of noncompliance is of concern, it is important to note that, in accordance with the language in SPP Indicator 15, the Bureau's current monitoring system considers the timeliness of correction of noncompliance to be of greatest significance.

On February 22, 2008, the preliminary report of findings from the self-assessment process was released to the district. The preliminary report detailed student-specific incidents of noncompliance that required immediate correction, and identified any standards for which the noncompliance was considered systemic (i.e., evident in $\geq 25\%$ of the records reviewed). In the event that there were systemic findings, a corrective action plan (CAP) was required. In addition,

BAMBI J. LOCKMAN
Chief
Bureau of Exceptional Education and Student Services

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the district participated in a validation review to ensure the accuracy of the self-assessment data. Your district's validation review revealed no inconsistencies in the original report of data.

In accordance with guidance from the Office of Special Education Programs (OSEP), U.S. Department of Education, a finding of noncompliance is identified by the standard (i.e., regulation or requirement) that is violated, not by the number of times the standard is violated. While each *incident* of noncompliance must be corrected for the individual student affected, multiple incidents of noncompliance regarding a given standard that occur within a school district are reported as a single *finding* of noncompliance for that district. These results are included in the Bureau's annual reporting to OSEP.

Districts were required to correct all student-specific noncompliance no later than April 25, 2008, and to provide evidence to the Bureau no later than April 30, 2008. We are pleased to report that Collier County School District completed the required corrective actions and submitted the verifying documentation and CAP within the established timeline.

Collier County was required to assess 37 standards. One or more incidents of noncompliance were identified on 7 of those standards (5%). The following is a summary of Collier County School District's correction of student-specific incidents of noncompliance:

Correction of Noncompliance by Student

	Number	Percentage
Records Reviewed/Protocols Completed	37	—
Total Items Assessed	1101	—
Noncompliant	15	1%
Timely Corrected	15	100%

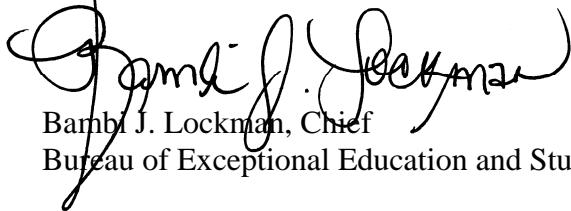
The *Collier District Summary Report: Findings of Noncompliance by Standard* (Attachment 1) contains a summary of the findings reported by the individual standard or regulation assessed. These data include revisions to the preliminary report that resulted from the validation review. Systemic findings are designated by shaded cells in the table. As noted in this attachment, one or more findings of noncompliance were determined to be systemic in nature and the district was required to develop a CAP to address the identified standards. Collier County School District's CAP was submitted to the Bureau for review and approval, and is provided in Attachment 2. Please note that a timeline for implementation, evaluation, and reporting of results on the part of the district is included in the CAP. Your district's adherence to this schedule is required in order to ensure correction of systemic noncompliance within a year as required by OSEP and Florida's SPP.

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The results of district self-assessments conducted during 2007-08 will be used to inform future monitoring activities, including the selection of districts for on-site monitoring, and in the local educational agency (LEA) determinations required under section 300.603, Title 34, Code of Federal Regulations, which result in districts being identified as "meets requirements," "needs assistance," "needs intervention," or "needs substantial intervention."

We understand that the implementation of this self-assessment required a significant commitment of resources, and appreciate the time and attention your staff has devoted to the process thus far. We look forward to receiving the district's report on the results of its corrective action plan, due to the Bureau no later than **December 22, 2008**. If you have questions regarding this process, please contact your assigned district liaison for monitoring or Dr. Kim C. Komisar, Administrator, at kim.komisar@fldoe.org or via phone at (850) 245-0476.

Sincerely,



Bambi J. Lockman, Chief
Bureau of Exceptional Education and Student Services

Attachments

cc: Victoria Sartorio
Frances Haithcock
Kim C. Komisar
Laura Harrison
Sheila Gritz

**Florida Department of Education
Bureau of Exceptional Education and Student Services**

**ESE Self-Assessment
2007 – 08**

Collier District Summary Report: Findings of Noncompliance by Standard

This report provides a summary of the district's results and must be used when developing a corrective action plan. Results are reported by standard, with systemic noncompliance (occurrence in $\geq 25\%$ of possible incidents) indicated as appropriate. See the *Student Report: Incidents of Noncompliance* for student-specific findings. Results are based on the following:

Number of IE protocols completed: 13

Number of standards per IE: 18

Number of IEP protocols completed: 14

Number of standards per IEP: 38

Number of MD protocols completed: 7

Number of standards per MD: 9

Number of STA protocols completed: 1

Number of standards per STA: 6

Number of STB protocols completed: 2

Number of standards per STB: 28

Number of ASD disabilities completed: 1

Number of standards per ASD: 10

Number of DD disabilities completed: 2

Number of standards per DD: 6

Number of LI disabilities completed: 7

Number of standards per LI: 7

Number of SI disabilities completed: 3

Number of standards per SI: 9

Number of SLD disabilities completed: 8

Number of standards per SLD: 14

Total number of protocols: 37

Total number of standards: 1101

Total number of incidents of noncompliance (NC): 15

Overall % incidents of noncompliance: 1%

Percent of noncompliance is calculated as the # of incidents of noncompliance for a given standard divided by the # of protocols reviewed for that standard, multiplied by 100.

* Correctable for the student(s): A finding for which immediate action can be taken to correct the noncompliance.

** Individual CAP: For a finding which cannot be corrected for an individual student, a corrective action plan (CAP) is required to address how the district will ensure future compliance; this plan will be limited in scope, based on the nature of the finding.

*** Systemic CAP: For a finding of noncompliance on a given standard that occurs in $\geq 25\%$ of possible incidents, a corrective action plan (CAP) is required to ensure future compliance; this plan must address the systemic nature of the finding and will be broader in scope than an individual CAP.

Note: In the event that there is a systemic finding of noncompliance on a standard that requires an individual CAP, only a systemic CAP is required.

**ESE Self-Assessment
2007 – 08**

Collier District Summary Report: Findings of Noncompliance by Standard

Noncompliance (NC)		*Correctable for the Student(s)	**Individual CAP	# NC	% NC	***Systemic CAP
STB-9	There is a measurable postsecondary goal or goals in the designated areas (i.e., education/training and employment; where appropriate, independent living). (34 CFR 300.320(b)(1))	X		2	100.0%	X
STB-15	The district obtained consent from the parent or from the student whose rights have transferred prior to inviting to the IEP team meeting a representative of an agency likely to provide or pay for transition services. (34 CFR 300.321(b)(3))		X	2	100.0%	X
STB-16	The IEP includes coordinated, measurable, annual IEP goals and transition service that will reasonably enable the student to meet the postsecondary goals. (34 CFR 300.320(b))	X		2	100.0%	X
IEP-14	The IEP includes measurable annual goals, including academic and functional goals, and short-term objectives or benchmarks, designed to meet the student's needs that result from the disability to enable the child to be involved in and make progress in the general curriculum and meet the student's other needs that result from the disability. (34 CFR 300.320(a)(2))	X		5	35.7%	X
IEP-17	The IEP contains a statement of supplementary aids and services, including location and anticipated initiation, duration and frequency. (34 CFR 300.320(a)(4) and (7))	X		1	7.1%	
IEP-24	The IEP contains an explanation of the extent, if any, to which the student will not participate with nondisabled students in the general education class. (34 CFR 300.320(a)(5))	X		2	14.3%	
MD-7	If the student did not have a functional behavioral assessment (FBA) developed and a behavior intervention plan (BIP) implemented prior to the removal, within 10 days the IEP team developed an assessment plan and completed the FBA and developed a BIP as soon as practicable. (34 CFR 300.530(d) and (f)(1)(i); Rule 6A-6.03312(4)(d), FAC.)	X		1	14.3%	

**Florida Department of Education
Bureau of Exceptional Education and Student Services**

**ESE Self-Assessment
2007 – 08**

Collier County School District Corrective Action Plan

#	Findings of Noncompliance	Activities	Timelines	Resources	Results/Status
STB-9	There is a measurable postsecondary goal or goals in the designated areas (i.e., education/training and employment; where appropriate, independent living). (34 CFR 300.320(b)(1))	<ul style="list-style-type: none"> • ESE Program Specialists participated in monthly professional development activities focused on processes and procedures related to graduation, post-school outcomes and secondary transition age 14 and age 16. • Training will be provided to ESE Program Specialists and to all secondary ESE Teachers addressing the requirements specific to transition planning for students age 14 and 16. • ESE will place the Secondary Transition Compliance Power Point on the department's website http://collier.k12.fl.us/ese/ under "staff resources". ST protocols and standards are already available on our website. • Coordinators will conduct self-assessment, using a random sampling of IEPs for select staff, at each school, to ensure 100% compliance. 	Aug-Dec 2007 May 15, 2008 Aug 18, 2008 May 2008 Jan–Dec 2008	DOE Compliance Manual protocols and standards DOE Secondary Transition Compliance Power Point Florida Statutes and State Board of Education Rules Collier Special Programs and Procedures Direct STEP online course: Life Beyond Grade 12	Ongoing

#	Findings of Noncompliance	Activities	Timelines	Resources	Results/Status
STB-15	The district obtained consent from the parent or from the student whose rights have transferred prior to inviting to the IEP team meeting a representative of an agency likely to provide or pay for transition services. (34 CFR 300.321(b)(3))	<ul style="list-style-type: none"> District developed a consent form to be completed at 9th grade IEP transition meeting, or for any new student in ESE. Implementation April 2008. District to disseminate a directive to all ESE teachers/ case managers to begin implementing the use of this form immediately. District to place document on ESE Department website for access. Coordinators will conduct self-assessment, using a random sampling of IEPs for select staff, at each school, to ensure 100% compliance. 	March 2008 April 2008 April 2008 Jan-Dec 2008	DOE Compliance Manual Florida Statutes and State Board of Education Rules	Ongoing
STB-16	The IEP includes coordinated, measurable, annual IEP goals and transition service that will reasonably enable the student to meet the postsecondary goals. (34 CFR 300.320(b))	<ul style="list-style-type: none"> ESE Program Specialists participated in monthly professional development activities focused on quality present level statements and measurable goals. School-based IEP training focusing on Secondary Transition IEP standards and components of a measurable goal and objectives. Training will be provided to ESE Program Specialists addressing the requirements specific to measurable goals and corroborating transition services. All ESE Teachers will participate in a district-wide video conference on writing measurable annual goals and short-term objectives, including the requirements specific to developing a compliant Transition IEP. 	Aug-Dec 2007 Oct 07-May 08 May 15, 2008 Aug 18, 2008	DOE Compliance Manual Florida Statutes and State Board of Education Rules FDLRS/ESE Measurable Goals Quick Checklist DOE Secondary Transition Compliance Power Point	Ongoing

#	Findings of Noncompliance	Activities	Timelines	Resources	Results/Status
		<ul style="list-style-type: none"> Coordinators will conduct self-assessment, using a random sampling of IEPs for select staff, at each school, to ensure 100% compliance. 	Jan–Dec 2008	Direct STEP course: Life Beyond Grade 12	
IEP-14	The IEP includes measurable annual goals, including academic and functional goals, and short-term objectives or benchmarks, designed to meet the student's needs that result from the disability to enable the child to be involved in and make progress in the general curriculum and meet the student's other needs that result from the disability. (34 CFR 300.320(a)(2))	<ul style="list-style-type: none"> ESE Program Specialists participated in monthly professional development activities focused on quality present level statements and measurable goals. School-based IEP training focusing on IEP standards and components of a measurable goal and objectives. Agenda topics include: IEP member roles and responsibilities; decision making; team discipline; compliance standards; developing present level statements and measurable goals and objectives. All ESE Teachers will participate in a district-wide video conference on writing measurable annual goals and short-term objectives. Coordinators will conduct self-assessment, using a random sampling of IEPs for select staff, at each school, to ensure 100% compliance. School-based administrators will participate in an Administrator's Academy which will include training on assessing ESE teachers in IEP compliance. 	Aug-Dec 2007 Oct 07-May08 Aug 18, 2008 Jan–Aug 2008 June 2-4, 2008	DOE Compliance Manual protocols and standards 7 Deadly Sins LRP CD FDLRS/ESE Measurable Goals Quick Checklist Direct STEP Course: Improving Your IEPs	