

FLORIDA DEPARTMENT OF EDUCATION



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June 20, 2008

Mr. Daniel G. Sims, Superintendent
Jackson County School District
P.O. Box 5958
Marianna, FL 32447-5958

Dear Mr. Sims:

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 Jackson 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

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 Jackson County School District completed the required corrective actions and submitted the verifying documentation and CAP within the established timeline.

Jackson County was required to assess 154 standards. One or more incidents of noncompliance were identified on 22 of those standards (14%). The following is a summary of Jackson County School District's correction of student-specific incidents of noncompliance:

Correction of Noncompliance by Student

	Number	Percentage
Records Reviewed/Protocols Completed	27	—
Total Items Assessed	747	—
Noncompliant	39	5%
Timely Corrected	39	100%

The *Jackson 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. Jackson 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.

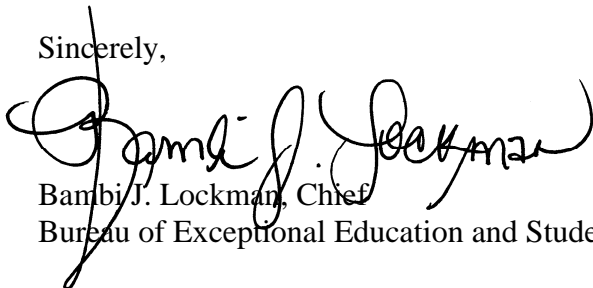
The results of district self-assessments conducted during 2007-08 will be used to inform future monitoring activities, including the selection of districts for on-site monitoring, and in the local educational agency (LEA) determinations required under section 300.603, Title 34, Code of

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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,

A handwritten signature in black ink, appearing to read "Bambi J. Lockman". The signature is fluid and cursive, with the first name being the most prominent.

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

Attachments

cc: Shawn Larkin
Frances Haithcock
Kim C. Komisar
Annette Oliver
Sheila Gritz

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

**ESE Self-Assessment
2007 – 08**

Jackson 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: 8	Number of STB protocols completed: 3	Number of OHI disabilities completed: 1
Number of standards per IE: 18	Number of standards per STB: 28	Number of standards per OHI: 5
Number of IEP protocols completed: 8	Number of DD disabilities completed: 3	Number of OI disabilities completed: 1
Number of standards per IEP: 38	Number of standards per DD: 6	Number of standards per OI: 5
Number of MD protocols completed: 5	Number of LI disabilities completed: 4	Number of SI disabilities completed: 4
Number of standards per MD: 9	Number of standards per LI: 7	Number of standards per SI: 9
Number of STA protocols completed: 3	Number of MH disabilities completed: 2	Number of SLD disabilities completed: 3
Number of standards per STA: 6	Number of standards per MH: 9	Number of standards per SLD: 14

Total number of protocols: 27
 Total number of standards: 747
 Total number of incidents of noncompliance (NC): 39
 Overall % incidents of noncompliance: 5%

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**

Jackson District Summary Report: Findings of Noncompliance by Standard

Noncompliance (NC)		*Correctable for the Student(s)	**Individual CAP	# NC	% NC	***Systemic CAP
STA-1	<p>The notice to the IEP team meeting included:</p> <ul style="list-style-type: none"> • A statement that a purpose of the meeting was the development of a statement of the student's transition services needs (beginning at age 14) or the consideration of the postsecondary goals and transition services (beginning at age 16) • A statement that the student would be invited • Indication that any agency likely to provide or pay for services during the current year would be invited. <p>(34 CFR 300.322(b)(2); Rule 6A-6.03028(3)(b), FAC.)</p>		X	1	33.3%	X
STA-4	<p>For students aged 14 and older:</p> <ul style="list-style-type: none"> • The IEP contains a statement of the student's desired post-school outcome • A statement of the student's transition service needs is incorporated into applicable components of the IEP • The IEP team considered the need for instruction in the area of self determination. <p>(Rule 6A-6.03028(7)(i), FAC.)</p>	X		2	66.7%	X
STB-1	<p>The notice to the IEP team meeting included:</p> <ul style="list-style-type: none"> • A statement that a purpose of the meeting was the development of a statement of the student's transition services needs (beginning at age 14) or the consideration of the postsecondary goals and transition services (beginning at age 16) • A statement that the student would be invited • Indication that any agency likely to provide or pay for services 		X	1	33.3%	X

Noncompliance (NC)		*Correctable for the Student(s)	**Individual CAP	# NC	% NC	***Systemic CAP
	during the current year would be invited. (34 CFR 300.322(b)(2); Rule 6A-6.03028(3)(b), FAC.)					
STB-4	For students aged 14 and older: <ul style="list-style-type: none"> The IEP contains a statement of the student's desired post-school outcome A statement of the student's transition service needs is incorporated into applicable components of the IEP The IEP team considered the need for instruction in the area of self determination. (Rule 6A-6.03028(7)(i), FAC.)	X		1	33.3%	X
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	66.7%	X
STB-10	The measurable postsecondary goals were based on age-appropriate transition assessment(s). (34 CFR 300.320(b)(1))	X		3	100.0%	X
STB-11	There is/are annual goal(s) or short-term objectives or benchmarks that reasonably enable the student to meet the postsecondary goals. (34 CFR 300.320(a)(2))	X		3	100.0%	X
STB-12	There are transition services on the IEP that focus on improving the academic and functional achievement of the student to facilitate the student's articulation to post-school. (34 CFR 300.320(b)(2))	X		1	33.3%	X
STB-13	The transition services include course(s) of study that focus on improving the academic and functional achievement of the student to facilitate the student's articulation from school to post-school. (34 CFR 300.320(b)(2))	X		1	33.3%	X

Noncompliance (NC)		*Correctable for the Student(s)	**Individual CAP	# NC	% NC	***Systemic CAP
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		3	100.0%	X
IEP-7	The notice contained a listing of persons invited to the meeting, by title and position. (34 CFR 300.322(b))		X	1	12.5%	
IEP-11	The parent consented to the excusal of an IEP team member when that person's curriculum/related service area was being discussed. (34 CFR 300.321(e)(2))		X	1	12.5%	
IEP-13	The IEP for a school-age student includes a statement of present levels of academic achievement and functional performance, including how the student's disability affects involvement and progress in the general curriculum, as well as a statement of the remediation needed to achieve a passing score on the general statewide assessment. For a prekindergarten student, the IEP contains a statement of how the disability affects the student's participation in the appropriate activities. (34 CFR 300.320(a)(1); Rule 6A-6.03028(7)(a), FAC.)	X		4	50.0%	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		4	50.0%	X
IEP-22	The parent provided consent for the student to receive instructional accommodations not permitted on statewide assessments and acknowledged the implications of such accommodations. (Section 1008.22(3)(c)6, F.S.; Rule 6A-6.03028(7)(e), FAC.)	X		1	12.5%	
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		1	12.5%	

Noncompliance (NC)		*Correctable for the Student(s)	**Individual CAP	# NC	% NC	***Systemic CAP
IEP-26	The IEP team considered the strengths of the student; the academic, developmental and functional needs of the student; the results of the initial evaluation or most recent evaluation; and the results of the student's performance on any state-or district-wide assessment. (34 CFR 300.324(a)(1))	X		1	12.5%	
IEP-27	The concerns of the parents for enhancing the education of their child were considered in developing the IEP. (34 CFR 300.324(a)(1)(ii))	X		1	12.5%	
IEP-35	If the current IEP represents a change of placement/change of FAPE from the previous IEP, or the district refused to make a change that the parent requested, the parent received appropriate prior written notice. (34 CFR 300.503)		X	2	25.0%	X
IEP-37	The IEP had been reviewed at least annually, and revised as appropriate, to address: any lack of progress toward the annual goals; any lack of progress in the general curriculum, if appropriate; the results of reevaluation; information about the student provided by the parent; and/or, the student's anticipated needs. (34 CFR 300.324(b)(1))	X		1	12.5%	
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	20.0%	
IE-10	The date of referral for a formal individual evaluation was no more than ten (10) working days after the date of receipt of parent consent. (Section II.E of the Policies and Procedures for the Provision of Specially Designed Instruction and Related Services for Exceptional Students SP&P))		X	3	37.5%	X

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

**ESE Self-Assessment
2007 – 08**

Jackson County School District Corrective Action Plan

#	Findings of Noncompliance	Activities	Timelines	Resources	Results/Status
STA-1	<p>The notice to the IEP team meeting included:</p> <ul style="list-style-type: none"> • A statement that a purpose of the meeting was the development of a statement of the student's transition services needs (beginning at age 14) or the consideration of the postsecondary goals and transition services (beginning at age 16) • A statement that the student would be invited • Indication that any agency likely to provide or pay for services during the current year would be invited. <p>(34 CFR 300.322(b)(2); Rule 6A-6.03028(3)(b), FAC.)</p>	<p>Provided six district training opportunities for Teachers/Guidance staff responsible for parent meeting notices.</p> <p>Randomly review 10 records at Marianna High and Sneads High to ensure that parent meeting notices are completed correctly.</p>	<p>March 5- April 9, 2008</p> <p>August 30, 2008</p>	<p>District Staff</p> <p>District Staff</p>	
STA-4	<p>For students aged 14 and older:</p> <ul style="list-style-type: none"> • The IEP contains a statement of the student's desired post-school outcome • A statement of the student's transition service needs is incorporated into applicable components of the IEP 	<p>Revised Transition IEP forms.</p> <p>Provided training for all Middle and High School Guidance Counselors and ESE teachers involved in Transition IEP meetings.</p>	<p>February 2008</p> <p>March 5- April 9, 2008</p>	<p>District Staff</p> <p>District Staff</p>	

#	Findings of Noncompliance	Activities	Timelines	Resources	Results/Status
	<ul style="list-style-type: none"> The IEP team considered the need for instruction in the area of self determination. <p>(Rule 6A-6.03028(7)(i), FAC.)</p>	<p>Participated in calls with DOE staff regarding appropriate transition components.</p> <p>Participants from Jackson County attended “Transition Assessment: The Tools and How to Use Them”</p> <p>Provided Transition Assessments to all High School ESE teachers to use prior to developing Transition IEPs.</p> <p>Randomly review 10 records at Marianna High and Sneads High to ensure that transition IEPs are completed correctly.</p>	<p>February 2008</p> <p>March 27, 2008</p> <p>March 2008</p> <p>August 30, 2008</p>	<p>District Staff Sheila Gritz</p> <p>DOE: Sheila Gritz</p> <p>District Staff</p> <p>District Staff</p>	
STB-1	<p>The notice to the IEP team meeting included:</p> <ul style="list-style-type: none"> A statement that a purpose of the meeting was the development of a statement of the student’s transition services needs (beginning at age 14) or the consideration of the postsecondary goals and transition services (beginning at age 16) A statement that the student would be invited Indication that any agency likely to provide or pay for services during the current year would be invited. <p>(34 CFR 300.322(b)(2); Rule 6A-6.03028(3)(b), FAC.)</p>	<p>Provided six district training opportunities for Teachers/Guidance staff who are responsible for parent meeting notices.</p> <p>Randomly review 10 records at Marianna High and Sneads High to ensure that parent meeting notices are completed correctly.</p>	<p>March 5- April 9, 2008</p> <p>August 30, 2008</p>	<p>District Staff</p> <p>District Staff</p>	

#	Findings of Noncompliance	Activities	Timelines	Resources	Results/Status
STB-4	<p>For students aged 14 and older:</p> <ul style="list-style-type: none"> The IEP contains a statement of the student's desired post-school outcome A statement of the student's transition service needs is incorporated into applicable components of the IEP The IEP team considered the need for instruction in the area of self determination. <p>(Rule 6A-6.03028(7)(i), FAC.)</p>	<p>Revised Transition IEP forms.</p> <p>Provided training for all Middle and High School Guidance Counselors and ESE teachers involved in Transition IEP meetings.</p> <p>Participated in calls with DOE staff regarding appropriate transition components.</p> <p>Revised Transition IEP forms.</p> <p>Provided Transition Assessments to all High School ESE teachers to use prior to developing Transition IEPs.</p> <p>Randomly review 10 records at Marianna High and Sneads High to ensure that transition IEPs are completed correctly.</p>	<p>February 2008</p> <p>March 5- April 9, 2008</p> <p>February 2008</p> <p>March 27, 2008</p> <p>March 2008</p> <p>August 30, 2008</p>	<p>District Staff</p> <p>District Staff</p> <p>District Staff Sheila Gritz</p> <p>DOE: Sheila Gritz</p> <p>District Staff</p> <p>District Staff</p>	
STB-9	<p>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))</p>	<p>Revised Transition IEP forms.</p> <p>Participants from Jackson County attended "Transition Assessment: The Tools and How to Use Them"</p> <p>Provided training for all Middle and High School Guidance Counselors and ESE teachers involved in Transition IEP meetings.</p>	<p>February 2008</p> <p>March 27, 2008</p> <p>March 5- April 9, 2008</p>	<p>District Staff</p> <p>ESE Teachers, DOE staff, Sheila Gritz</p> <p>District Staff</p>	

#	Findings of Noncompliance	Activities	Timelines	Resources	Results/Status
		Randomly review 10 records at Marianna High and Sneads High to ensure that transition IEPs are completed correctly.	August 30, 2008	District Staff	
STB-10	The measurable postsecondary goals were based on age-appropriate transition assessment(s). (34 CFR 300.320(b)(1))	Participants from Jackson County attended "Transition Assessment: The Tools and How to Use Them" Provided Transition Assessments to all High School ESE teachers to use prior to developing Transition IEPs	March 27, 2008 March 2008	DOE Staff/Sheila Gritz District Staff	
STB-11	There is/are annual goal(s) or short-term objectives or benchmarks that reasonably enable the student to meet the postsecondary goals. (34 CFR 300.320(a)(2))	Provided training for all Middle and High School Guidance Counselors and ESE teachers involved in Transition IEP meetings. Revised Transition IEP forms. Randomly review 10 records at Marianna High and Sneads High to ensure that transition IEPs are completed correctly.	March 5, 2008- April 9, 2008 February 2008 August 2008	District Staff District Staff District Staff	
STB-12	There are transition services on the IEP that focus on improving the academic and functional achievement of the student to facilitate the student's articulation to post-school. (34 CFR 300.320(b)(2))	Revised Transition IEP forms. Randomly review 10 records at Marianna High and Sneads High to ensure that transition IEPs are completed correctly.	February 2008 August 2008	District Staff	
STB-13	The transition services include course(s) of study that focus on improving the academic and functional achievement of the student to facilitate the student's articulation from school to post-school. (34 CFR 300.320(b)(2))	Revised Transition IEP forms. Randomly review 10 records at Marianna High and Sneads High to ensure that transition IEPs are completed correctly.	February 2008 August 2008	District Staff District Staff	

#	Findings of Noncompliance	Activities	Timelines	Resources	Results/Status
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))	<p>Revised Transition IEP forms.</p> <p>Provide mentoring to new ESE teachers.</p> <p>Randomly review 10 records at Marianna High and Sneads High to ensure that transition IEPs are completed correctly.</p>	<p>February 2008</p> <p>August 2007- August 2008</p> <p>August 2008</p>	<p>District Staff</p> <p>District Staff</p> <p>District Staff</p>	
IEP-13	The IEP for a school-age student includes a statement of present levels of academic achievement and functional performance, including how the student's disability affects involvement and progress in the general curriculum, as well as a statement of the remediation needed to achieve a passing score on the general statewide assessment. For a prekindergarten student, the IEP contains a statement of how the disability affects the student's participation in the appropriate activities. (34 CFR 300.320(a)(1); Rule 6A-6.03028(7)(a), FAC.)	<p>Provided six district training opportunities for Teachers/Guidance staff responsible for participating in development of IEPs.</p> <p>Provide mentoring for new ESE teachers.</p> <p>Provide opportunities for teachers to attend workshops sponsored by FDLRS/PAEC on "Writing Quality IEPs."</p> <p>Randomly review 20 records at Marianna Middle School to ensure that transition IEPs are completed correctly.</p>	<p>March – April 2008</p> <p>August 2007- August 2008</p> <p>On-going</p> <p>August 2008</p>	<p>District Staff</p> <p>District Staff</p> <p>PAEC</p> <p>District Staff</p>	
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))	<p>Provided six district training opportunities for Teachers/Guidance staff responsible for participating in development of IEPs.</p> <p>Provided opportunities for teachers to participate in workshops that focused on Writing Quality IEPs.</p> <p>Randomly review 20 records at Marianna Middle School to ensure that transition IEPs are completed correctly.</p>	<p>March –April 2008</p> <p>August 10, 2007 and November 16, 2007</p> <p>August 2008</p>	<p>District Staff</p> <p>District Staff/PAEC Staff</p> <p>District Staff</p>	

#	Findings of Noncompliance	Activities	Timelines	Resources	Results/Status
IEP-35	If the current IEP represents a change of placement/change of FAPE from the previous IEP, or the district refused to make a change that the parent requested, the parent received appropriate prior written notice. (34 CFR 300.503)	<p>Training and Materials provided to staff responsible for completing change of placement/change of FAPE forms.</p> <p>Random review of 20 records from MMS to ensure that Change of placement/FAPE forms are completed correctly.</p>	<p>March 2008</p> <p>August 2008</p>	<p>District staff</p> <p>District staff</p>	
IE-10	The date of referral for a formal individual evaluation was no more than ten (10) working days after the date of receipt of parent consent. (Section II.E of the Policies and Procedures for the Provision of Specially Designed Instruction and Related Services for Exceptional Students SP&P))	<p>Student Services Department provided training and informational materials which addressed the referral process guidelines</p> <p>Randomly review 25 referrals received by Student Services to determine that the guidelines in the Policies and Procedures for the Provision of Specially Designed Instruction and Related Services for Exceptional Students SP&P were followed.</p>	<p>December 3, 2007</p> <p>January 10, 2008</p> <p>August 2008</p>	<p>District staff</p> <p>Materials</p>	