

# FLORIDA DEPARTMENT OF EDUCATION



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June 20, 2008

Mr. Jackie Pons, Superintendent  
Leon County School District  
2757 West Pensacola Street  
Tallahassee, Florida 32304-2907

Dear Mr. Pons:

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 Leon 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. As a result of the validation review, additional incidents or findings of noncompliance requiring correction were identified.

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

Leon County was required to assess 156 standards. One or more incidents of noncompliance were identified on 10 of those standards (6%). The following is a summary of Leon County School District's correction of student-specific incidents of noncompliance:

**Correction of Noncompliance by Student**

	<b>Number</b>	<b>Percentage</b>
Records Reviewed/Protocols Completed	26	–
Total Items Assessed	757	–
Noncompliant	17	2%
Timely Corrected	17	100%

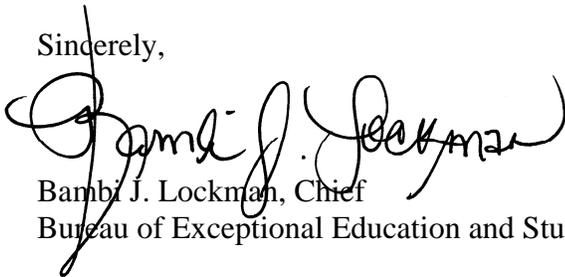
The *Leon District Summary Report: Findings of Noncompliance by Standard* (Attachment 1) contains a summary of the findings reported by the individual standard or regulation assessed. These data include revisions to the preliminary report that resulted from the validation review. Systemic findings are 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. Leon 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](mailto: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: Ward Spisso  
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**

**Leon 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: 10  
 Number of standards per IE: 18  
 Number of IEP protocols completed: 10  
 Number of standards per IEP: 38  
 Number of MD protocols completed: 4  
 Number of standards per MD: 9  
 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: 1  
 Number of standards per DD: 6  
 Number of EBD disabilities completed: 1  
 Number of standards per EBD: 11

Number of MH disabilities completed: 1  
 Number of standards per MH: 9  
 Number of OHI disabilities completed: 1  
 Number of standards per OHI: 5  
 Number of SLD disabilities completed: 4  
 Number of standards per SLD: 14  
 Number of DHH disabilities completed: 1  
 Number of standards per DHH: 8

Total number of protocols: 26  
 Total number of standards: 757  
 Total number of incidents of noncompliance (NC): 17  
 Overall % incidents of noncompliance: 2%

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**

**Leon 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-10	The measurable postsecondary goals were based on age-appropriate transition assessment(s). (34 CFR 300.320(b)(1))	X		2	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		2	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		2	100.0%	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		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-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.	X		1	10.0%	

Noncompliance (NC)		*Correctable for the Student(s)	**Individual CAP	# NC	% NC	***Systemic CAP
	(34 CFR 300.320(a)(1); Rule 6A-6.03028(7)(a), FAC.)					
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		2	20.0%	
IEP-25	The IEP contains descriptions of how progress toward annual goals will be measured including how often parents will be regularly informed of their child's progress. Parents of disabled students must be informed of this progress at least as often as parents of nondisabled students. (34 CFR 300.320(a)(3); Rule 6A-6.03028(7)(g), FAC.)	X		1	10.0%	
IEP-36	The report of progress was provided as often as progress was reported to the nondisabled population and described the progress towards annual goals and the extent to which that progress was sufficient to enable the student to achieve such goals by the end of the year. (34 CFR 300.320(a)(3); Rule 6A-6.03028(7)(g), FAC.)	X		1	10.0%	

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

**ESE Self-Assessment  
2007 – 08  
Leon 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))	<ol style="list-style-type: none"> <li>1. Technical assistance materials are being developed by district program specialists with input from classroom teachers. Drafts of these are included with this plan.</li> <li>2. Program specialists are currently in the schools once a week and meet with ESE teachers as a team once a month for training and communication. These trainings for school staff will include specifically the IDEA requirements to ensure full understanding of the requirements.</li> <li>3. Products generated from the Big Bend Transition Council (BBTC) will be included in all teacher trainings. These include the Big Bend Transition Spectrum of Services and Guide for Students with Disabilities and the Transition Assessment Resource Mapping Chart.</li> <li>4. High school ESE teachers as well as District Program Specialists working with secondary programs will be encouraged to take the on-line PDA-ESE course on Transition offered through FDLRS.</li> <li>5. The Transition Center at U of F is creating a DVD, "Everything You Need to Know about Transition", that will be utilized for training of all school staff as specified above.</li> </ol>	Beginning in the Spring 2008 and carrying over to the 2008-2009 school year.	PDA-ESE on-line course April 9,2008 – June 18, 2008 & re-occurring in the Fall of 08; District developed technical assistance documents; FLDOE technical assistance documents when made available; Products generated from the Big Bend Transition Council; Transition Center at UF	
STB-10	The measurable postsecondary goals were based on age-appropriate transition assessment(s). (34 CFR 300.320(b)(1))	<ol style="list-style-type: none"> <li>1. Technical Assistance materials are being developed that will assist teachers in understanding and identifying appropriate transition assessments including Formal Assessments such as FCAT, PSAT, SAT, ACT, LCCE, Choices and Informal Assessments such as Curriculum Based Vocational Assessment, Curriculum Based Assessment, Interest Inventories, Self-determination assessments, and informal questionnaires. Teachers are doing many of the activities identified, both formal and informal but have not documented the process.</li> <li>2. The Transition Assessment Resource Mapping chart mentioned above under #3 will be utilized to designate not</li> </ol>	Beginning in the Spring 2008 and carrying over to the 2008-2009 school year.	PDA-ESE on-line course April 9,2008 – June 18, 2008 & re-occurring in the Fall of 08; District developed technical assistance documents; FLDOE technical assistance documents when made available; Transition Assessment Resource Mapping chart from BBTC; Transition	

#	Findings of Noncompliance	Activities	Timelines	Resources	Results/Status
		only assessments available in the school system, but also the local agencies. 3. See #s 3, 4, and 5 of STB-9		Center at UF	
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))	1. See #s 2, 4 and 5 of STB-9	Beginning in the Spring 2008 and carrying over to the 2008-2009 school year.	PDA-ESE on-line course April 9,2008 – June 18, 2008 & re-occurring in the Fall of 08; District developed technical assistance documents; FLDOE technical assistance documents when made available; Transition Center at UF	
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))	1. See #s 2, 4 and 5 of STB-9 2. Our computer generated system for IEPs (A3-IEP) will be reviewed for necessary changes, and these will be made in the system.	Beginning in the Spring 2008 and carrying over to the 2008-2009 school year.	PDA-ESE on-line course April 9,2008 – June 18, 2008 & re-occurring in the Fall of 08; District developed technical assistance documents; FLDOE technical assistance documents when made available; Transition Center at UF	
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))	1. See #s 2, 4 and 5 of STB-9 2. Our computer generated system for IEPs (A3-IEP) will be reviewed for necessary changes, and these will be made in the system. 3. Randomly selected secondary student records will be reviewed by District Program Specialist to ensure that teachers fully understand and are implementing the transition requirements.	Beginning in the Spring 2008 and carrying over to the 2008-2009 school year.	PDA-ESE on-line course April 9,2008 – June 18, 2008 & re-occurring in the Fall of 08; District developed technical assistance documents; FLDOE technical assistance documents when made available; Transition Center at UF	