

FLORIDA DEPARTMENT OF EDUCATION



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June 20, 2008

Mr. Randy Acevedo, Superintendent
Monroe County School District
P.O. Box 1788
Key West, Florida 33041-1788

Dear Mr. Acevedo:

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

Monroe County was required to assess 145 standards. One or more incidents of noncompliance were identified on 11 of those standards (8%). The following is a summary of Monroe County School District's correction of student-specific incidents of noncompliance:

Correction of Noncompliance by Student

	Number	Percentage
Records Reviewed/Protocols Completed	25	–
Total Items Assessed	689	–
Noncompliant	16	2%
Timely Corrected	16	100%

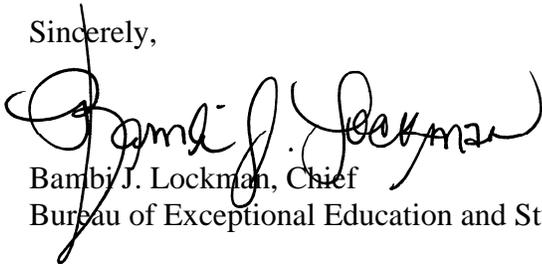
The *Monroe District Summary Report: Findings of Noncompliance by Standard* (Attachment 1) contains a summary of the findings reported by the individual standard or regulation assessed. These data include revisions to the preliminary report that resulted from the validation review. Systemic findings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

Mr. Randy Acevedo
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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: Leslie Messier
Frances Haithcock
Kim C. Komisar
Ken Johnson
Sheila Gritz

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

**ESE Self-Assessment
2007 – 08**

Monroe 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 standards per IE: 18
 Number of IEP protocols completed: 8
 Number of standards per IEP: 38
 Number of MD protocols completed: 5
 Number of standards per MD: 9
 Number of STA protocols completed: 1
 Number of standards per STA: 6
 Number of STB protocols completed: 3
 Number of standards per STB: 28
 Number of DD disabilities completed: 1
 Number of standards per DD: 6

Number of LI disabilities completed: 1
 Number of standards per LI: 7
 Number of SI disabilities completed: 1
 Number of standards per SI: 9
 Number of SLD disabilities completed: 6
 Number of standards per SLD: 14

Total number of protocols: 25
 Total number of standards: 689
 Total number of incidents of noncompliance (NC): 16
 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**

Monroe District Summary Report: Findings of Noncompliance by Standard

Noncompliance (NC)		*Correctable for the Student(s)	**Individual CAP	# NC	% NC	***Systemic CAP
STA-3	The student's strengths, preferences, and interests were taken into account. If the student was unable to attend the meeting, other steps were taken to ensure the student's preferences and interests were considered. (34 CFR 300.43 and 300.321(b)(2); Rule 6A-6.03028(4)(h), FAC.)	X		1	100.0%	X
STA-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	100.0%	X
STA-5	Beginning in eighth grade, or during the school year in which the student turns 14, whichever is sooner, the IEP must include a statement of whether the student is pursuing a course of study leading to a standard diploma or a special diploma. (Rule 6A-6.03028(7)(h), FAC.)	X		1	100.0%	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		1	33.3%	X
STB-10	The measurable postsecondary goals were based on age-appropriate transition assessment(s). (34 CFR 300.320(b)(1))	X		2	66.7%	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		2	66.7%	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. (34 CFR 300.320(a)(1); Rule 6A-6.03028(7)(a), FAC.)	X		2	25.0%	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		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%	
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	1	12.5%	
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**

Monroe County School District Corrective Action Plan

#	Findings of Noncompliance	Activities	Timelines	Resources	Results/Status
STA-3	<p>The student's strengths, preferences, and interests were taken into account. If the student was unable to attend the meeting, other steps were taken to ensure the student's preferences and interests were considered. (34 CFR 300.43 and 300.321(b)(2); Rule 6A-6.03028(4)(h), FAC.)</p>	<p>The development of a three tiered system has been established to train and systematically monitor each school, staffing specialist, and teacher. The first step was to develop the tiers of activities and trainings. Second is to monitor IEPs at three levels and then thirdly is to target high school transition IEPs and any additional occurrences. 100% compliance is expected by Dec 2008</p>	<p>March 2008</p> <p>Share State reports with District Administration and Principals requesting administrative support during the Tiered interventions with teachers.</p>	<p>Dissemination of PDA on Line ESE modules. On-going</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 • The IEP team considered the need for instruction in the area of self determination. <p>(Rule 6A-6.03028(7)(i), FAC.)</p>	<p>Training: Quality Transition Planning.</p> <p>Tier One: Starting with the identified systemic areas of concern and statistical results (data) of the Monroe County School District ESE Self Assessment Report two regional trainings have been scheduled on the District Professional Development days of April 24 and April 25, 2008</p> <p>45 randomly chosen IEPs during Feb 2008 and March 2008 (5 each by school/staffing specialist) will be reviewed and data will be shared with school administration and staffing specialists. (May 2008) In June 2008 school based trainings will be scheduled individually for those teachers and staff that did not attend one of the two regional trainings in April 2008.</p>	<p>April 2008</p> <p>Develop And conducted initial training (Quality Transition Planning) of staffing specialists and teachers</p>	<p>MCS D Transition Specialist work together with program specialist to develop an effective training with revisions as needed. The trainings will clearly identify monitored items of all IEPs.</p> <p>Levels of training: broad, focused and individuals/mentoring</p>	
STA-5	<p>Beginning in eighth grade, or during the school year in which the student turns</p>				

#	Findings of Noncompliance	Activities	Timelines	Resources	Results/Status
	<p>14, whichever is sooner, the IEP must include a statement of whether the student is pursuing a course of study leading to a standard diploma or a special diploma. (Rule 6A-6.03028(7)(h), FAC.)</p>	<p>Tier Two:</p> <p>Starting with the results of the reviewed IEPs from Feb and March 2008 data will be analyzed to identify schools who continue to have compliance issues. School based trainings will take place for all individual schools that have non compliance items and for those individuals who did not attend the regional trainings. School based teams will be established to identify resources within individual schools: experienced teachers, on-line trainings, etc. During May 2008 and September 2008 IEPs will be collected from the three regional high schools representing at least 80% of all MCSD high school ESE teachers. (23 total teachers /18 teachers equals 80%) Review and compliance monitoring will identify areas of needed additional training and mentoring.</p>	<p>May 2008</p> <p>Review 5 IEPs from each school and associated Staffing Specialist and compare statistical data with initial Self Assessment data. Identify specific schools to comply with trainings and follow-up activities (mentoring peer teachers and collaborative IEP writing)</p>	<p>Utilizing school based resources identify printed material, job coaches, curriculum for self determination and career choices that will assist with transition planning for individual students.</p>	
<p>STB-9</p>	<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>Tier Three:</p> <p>Starting with the results of the review of at least 80% of our ESE high school area teachers any additional targeted needs will be individually addressed with specific teachers in order to meet 100% compliance of these secondary transition IEPs. Any IEPs that were found to be out of compliance will be reconvened with the assistance of MCSD transition specialist in order to assure compliance. Principals will be notified of the compliance concerns due to individual teachers' non compliance with district training. 100% compliance is expected for all indicators for post secondary transition IEPs.</p>	<p>July 2008</p> <p>Review an IEP for at least 80% of all MCSD high school ESE teachers randomly chosen which were completed during May 2008 and Sept 2008.</p>		
<p>STB-10</p>	<p>The measurable postsecondary goals were based on age-appropriate transition assessment(s). (34 CFR 300.320(b)(1))</p>		<p>October 2008</p> <p>Final review of targeted high school IEP's</p>		

#	Findings of Noncompliance	Activities	Timelines	Resources	Results/Status
		<p>Final Review:</p> <p>December 2008: Established school based teams lead by assigned school staffing specialists will be able to periodically check for compliance on the transition IEPs and support new and struggling teachers in the writing of compliant transition IEPs.</p>	<p>and referral to MCSD transition specialist to assist in the IEP reconvene and notice to individual principals for identified non compliance of individual teachers.</p>		
STB-16	<p>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>		<p>November 2008</p> <p>Hold any and all IEPs that need to be reconvened due to compliance inadequacies.</p> <p>December 2008</p> <p>Report on all finding to the state.</p>		
IEP-13	<p>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.</p>	<p>Updating the current “cheat sheets” for teachers will assist in being sure that these items are not missed during the writing of all IEPs.</p> <p>The development of a more focused IEP writing training that will be conducted regionally during pre planning will target the components of a compliant IEP. (Aug 2008)</p> <p>The establishment of school based mentoring for new and struggling teachers will be lead by school staffing specialists.</p>	<p>July 2008</p> <p>August 2008</p> <p>August 2008</p>	<p>Our teacher resource BLUE BOOK will include the IEP Make it Measurable training and the updated “Cheat Sheets”</p>	

#	Findings of Noncompliance	Activities	Timelines	Resources	Results/Status
	(34 CFR 300.320(a)(1); Rule 6A-6.03028(7)(a), FAC.)	5 randomly chosen IEPs from 5 schools will be reviewed for this compliance item and reports will be returned to staffing specialist to reconvene IEPs if necessary.	October 2008		
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))	Reminder email of SP&P training describing the procedures of SST in regards to permission for formal evaluation. District wide training during Pre Planning highlighting state compliance items and county procedures for SST	4-1-08 and 4-19-08 August 2008	Included copies of e-mails and SST Cheat Sheets	