

SARASOTA COUNTY

Focused Monitoring

Exceptional Student Education Programs

October 23-26, 2006

Florida Department of Education
Bureau of Exceptional Education and Student Services
ESE Program Administration and Quality Assurance

FLORIDA DEPARTMENT OF EDUCATION



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March 29, 2007

Dr. Gary Norris, Superintendent
Sarasota County School District
1960 Landings Boulevard
Sarasota, Florida 34231-3304

Dear Superintendent Norris:

We are pleased to provide you with the Final Report of Focused Monitoring of Exceptional Student Education Programs in Sarasota County. This report was developed by integrating multiple sources of information, including: student record reviews; interviews with school and district staff; information from focus groups; and parent survey data from our visit on October 23-26, 2006. The final report will be placed on the Bureau of Exceptional Education and Student Services' website and may be viewed at www.firn.edu/doe/commhome/mon-home.htm.

The report includes a system improvement plan outlining the findings of the monitoring team. Bureau staff have worked with Michael McHugh, ESE Director, and his staff to develop a system improvement plan that includes strategies and activities to address the areas of concern and noncompliance identified in the report. We anticipate that some of the action steps that will be implemented will be long term in duration, and will require time to assess the measure of effectiveness. The system improvement plan has been approved and is included as a part of this final report.

The first scheduled update on the system improvement plan will be due on August 31, 2007. The Department of Education must ensure timely corrections on noncompliance within one year of reporting to the district. The successful completion of improvement plan activities and the submission of the annual report no later than March 7, 2008, will be required. A verification monitoring visit to your district may take place after review of the annual report.

BAMBI J. LOCKMAN
Chief

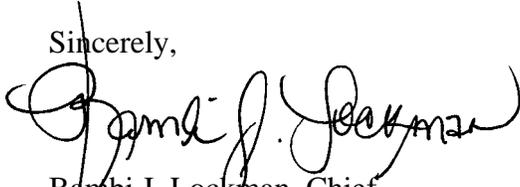
Bureau of Exceptional Education and Student Services

Superintendent Norris
March 29, 2007
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If my staff can be of any assistance as you implement the system improvement plan, please contact Eileen L. Amy, ESE Program Administration and Quality Assurance Administrator. Ms. Amy may be reached at 850/245-0476, or via electronic mail at Eileen.Amy@fldoe.org.

Thank you for your continuing commitment to improve services for exceptional education students in Sarasota County.

Sincerely,



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

Enclosure

cc: Frank Kovach, School Board Chairman
Members of the School Board
Arthur Hardy, School Board Attorney
School Principals
Michael McHugh, ESE Director
Kathy Devlin, ESE Supervisor
Eileen L. Amy
Ginny Chance

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Sarasota County Final Monitoring Report
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Sarasota County Monitoring Report

Focused Monitoring

October 23-26, 2006

Monitoring Process

Authority

The Florida Department of Education, Bureau of Exceptional Education and Student Services, in carrying out its roles of leadership, resource allocation, technical assistance, monitoring, and evaluation is required to oversee the performance of district school boards in the enforcement of all laws and rules (Sections 1001.03(8) and 1008.32, Florida Statutes (F.S.)). In fulfilling this requirement, the Bureau conducts monitoring activities of the exceptional student education (ESE) programs provided by district school boards in accordance with Sections 1001.42 and 1003.57, F.S. Through these monitoring activities, the Bureau examines and evaluates procedures, records, and programs of exceptional student education (ESE); provides information and assistance to school districts; and otherwise assists school districts in operating effectively and efficiently. One purpose of the Individuals with Disabilities Education Improvement Act of 2004 (IDEA 2004) is to assess and ensure the effectiveness of efforts to educate children with disabilities (Section 300.1(d) of Title 34, Code of Federal Regulations (CFR), and districts are required to make a good faith effort to assist children with disabilities to achieve their stated goals and objectives in the least restrictive environment (34 CFR §300.350(a)(2) and §300.556). In accordance with the IDEA 2004, the Department is responsible for ensuring that the requirements of the IDEA are carried out and that each educational program for children with disabilities administered in the state meets the educational requirements of the state (34 CFR §300.600(a)(1) and (2)). Federal Regulations for IDEA 2004 were made public on August 14, 2006, and implementation required October 13, 2006.

The monitoring system reflects the Department's commitment to provide assistance, service, and accountability to school districts, and is designed to emphasize improved educational outcomes for students while continuing to conduct those activities necessary to ensure compliance with applicable federal laws and regulations and state statutes and rules. In addition, these activities serve to ensure implementation of corrective actions such as those required subsequent to monitoring by the U.S. Department of Education, Office of Special Education Programs (OSEP), and by the Office for Civil Rights (OCR), as well as other quality assurance activities of the Department.

State Performance Plan and Monitoring

In accordance with 34 CFR 300.600(a)(1), not later than one year after the date of enactment of the Individuals with Disabilities Education Improvement Act of 2004, each State must have in place a performance plan that evaluates the State's efforts to implement the requirements and purposes of Part B and describe how the State will improve such implementation. The purpose of the monitoring process is to implement a methodology that targets the Bureau's monitoring

intervention on key data indicators identified as significant for educational outcomes for students. Through this process, the Bureau uses data to inform the monitoring process, thereby implementing a strategic approach to intervention and commitment of resources that will improve student outcomes. A detailed description of the Bureau's monitoring processes is provided in *Focused Monitoring and Verification Monitoring: Work Papers and Source Book for Exceptional Student Education Programs (2006-07)*. The protocols used by Bureau staff when conducting procedural compliance reviews are available in *Compliance Manual: Work Papers and Source Book for Exceptional Student Education Programs (2006-07)*. These documents will be made available on the Bureau's website at www.firn.edu/doe/commhome/mon-home.htm.

Indicator Selection

In its continuing effort to focus the monitoring process on student educational outcomes, there are three specific monitoring priority areas which are identified in the IDEA 2004 at section 616(a)(3). The first priority is the provision of a free appropriate public education (FAPE) in the least restrictive environment (LRE) which includes standard diploma rate, dropout rate, participation and performance on statewide assessments, suspension and expulsion, LRE for both ages 6-21 and for pre-kindergarten (PK) children, PK outcomes, and parent satisfaction. The second priority is general supervision by the state which includes child find, transition (Part C to Part B), secondary transition, and postsecondary outcomes. The third priority is disproportionate representation of racial and ethnic groups in special education and related services including all disabilities in general and specific disability categories. The IDEA 2004 can be viewed on the web at <http://www.ed.gov/policy/speced/guid/idea/idea2004.html>.

Data on all State Performance Plan (SPP) indicators used to determine the focus of this on-site visit was based on a review of data from the 2006 local educational agency (LEA) Profile that was submitted electronically to the Department of Education (DOE) Information Database for Surveys 2, 3, 5, 9, and from the assessment files for each school year. This data is compiled into an annual data profile for each district. The 2006 LEA Profiles for all Florida school districts are available on the web at <http://www.firn.edu/doe/commhome/datapage.htm>.

Background Information and Demographics

During the week of October 23, 2006, the Florida Department of Education, Bureau of Exceptional Education and Student Services, conducted an on-site review of the exceptional student education (ESE) programs in Sarasota County Public Schools. Mike McHugh, Exceptional Student Education Director, and Kathryn Devlin, ESE Supervisor served as coordinators and points of contact for the district during the monitoring visit. Sarasota County was monitored on the following indicators: LRE 3-5, LRE 6-21, disproportionate representation of emotionally handicapped (EH) and educable mentally handicapped (EMH), suspension/discipline, transition and dropout. In addition, data on the under representation of students identified as gifted and Florida Comprehensive Assessment Test (FCAT) waiver was also reviewed.

Based on the 2006 LEA profile, Sarasota County School District has a total school population (PK-12) of 41,884 with 16% of students being identified as students with disabilities, 11% of

Exceptional Education Students identified as speech impaired only, and 11% of Exceptional Education Students identified as gifted. Sarasota County is considered a “medium size” district and is comprised of 21 elementary schools, (K-5), one k-8 school, six middle schools 6-8, five high schools 9-12, and two alternative schools, one center school for the gifted. The district also has two Department of Juvenile Justice (DJJ) programs.

Sarasota County is a diverse community, with 59% of students on free or reduced lunch and 13% of students identified as limited English proficient. Of the students with disabilities who exited from the district with their cohorts during the 2003-04 school year, 74% met the requirements for graduation as defined by No Child Left Behind (NCLB). Of all the students with disabilities who graduated in Sarasota County during 2004-05, 56% met all graduation requirements for a standard diploma. 7% met the requirements through a waiver of a passing score on the Florida Comprehensive Assessment Test (FCAT), and 4% graduated through the General Educational Development (GED) exit option (i.e., under-credited students who have passed the FCAT and who pass the GED examination). The district has a dropout rate of 6% on the LEA Profile for students with disabilities. One percent of the population of students with disabilities had received out-of-school suspensions totaling ten or more days.

Monitoring Activities

The Bureau conducted the on-site focused monitoring visit from October 23-26, 2006. Five Bureau staff members and fifteen peer monitors conducted site-visits to the following fifteen schools, including one Charter School:

- Booker Middle School
- Cranberry Elementary School
- Emma E. Booker Elementary School
- Gulf Gate Elementary School
- Infinity Middle School
- McIntosh Middle School
- North Port High School
- Oak Park School
- Pine View School for the Gifted
- Riverview High School
- Sarasota School of Arts and Sciences (Charter)
- Tuttle Elementary School
- Venice Elementary School
- Venice Middle School
- Venice Senior High School

Peer monitors are exceptional student education personnel from school districts and are trained to assist with the DOE’s monitoring activities. A listing of Bureau staff and peer monitors who conducted the monitoring activities for this visit is included as appendix A.

The monitoring process includes interviews with administrators, teachers, and other service delivery providers, focus group interviews with students, case studies, classroom observations,

record reviews, and surveys of parents. A summary of the monitoring activities conducted in Sarasota County is included in the table below.

Activity	Source	Number
Interviews	District staff	10
	School staff	
	▪ School administrators/non-instructional support	53
	▪ ESE teachers—disabilities	55
	▪ ESE teachers—gifted	10
	▪ General education teachers	28
		Total 156
Focus Groups	North Port HS—grades 9-12	
	▪ Students pursuing special diploma	14
	▪ Students pursuing standard diploma	16
	Riverview HS—grades 9-12	
	▪ Students pursuing special diploma	16
	▪ Students pursuing standard diploma	17
		Total 63
Case studies	Individual student case studies	54
Classroom Visits	ESE and general education classrooms	58
Record Reviews	IEPs	
	▪ Targeted on-site review	252
	▪ Matrix of services documents	14
	EPs	
	▪ Targeted on-site review	34
		Total 300
Surveys	Parents—students with disabilities	
	▪ Number sent	4,345
	▪ Number returned (%)	512 (12%)
	▪ District facilitates parent involvement	127 (25%)

The results of the surveys are included as appendix B.

Reporting of Information

Findings based on data generated through record reviews, focus group interviews, individual interviews, case studies, classroom visits, parent surveys, and the review of district forms are summarized in the reporting table that follows. This report provides conclusions with regard to the key data indicators and specifically addresses related areas that may contribute to or impact the indicators.

In addition, information related to services for gifted students is reported.

To the extent possible, this report focuses on systemic issues rather than on isolated instances of noncompliance or need for improvement. In accordance with established Bureau monitoring

procedures, a finding of a systemic violation will be made if evidence of such a violation is found in 25% or more of the pertinent data sources.

During the course of conducting the focused monitoring activities, including daily debriefings with the monitoring team and district staff, it is often the case that suggestions and/or recommendations related to interventions or strategies are proposed, and promising practices are noted. Listings of these recommendations and promising practices, as well as DOE contacts available to provide technical assistance in the development and implementation of a system improvement plan, are included following the reporting table.

In response to specific student related findings listed in the letter to the superintendent, dated February 28, 2007, the district is required to correct the items as noted. This plan identifies the specific area(s) of a student's IEP for which an IEP Team meeting must be held to correct the finding and/or specifies an action the district must perform to correct data.

In response to the findings included in the reporting table, the district was required to develop a system improvement plan. This plan was developed in consultation with the Bureau, and includes activities and strategies intended to address specific findings, as well as measurable evidence of change.

**Sarasota County School District
Focused Monitoring**

Reporting Table

Standard/Citation	Findings	Supporting Evidence	Concerns
Indicator: LRE-PK			
Related Factor: IEP Requirements/Implementation			
6A-6.03026	To the maximum extent appropriate, the educational assignment of pre-kindergarten children with disabilities shall be provided in the least restrictive environment which ensures interaction with children without disabilities or those with milder delays, or in natural environments.	<p>Records:</p> <p>12 of 12 records reviewed student's placement was not in natural environments.</p> <p><i>Interviews:</i></p> <p>3 of 3 district staff interviewed reported that lack of space prohibited student placement in different environment.</p> <p>5 of 5 ESE pre-K teachers interviewed reported that they had students who could benefit from placement in a less restrictive, more natural environment with typically developing peers.</p>	
Indicator: LRE 6-21			
Related Factor: Notice			
34 CFR §300.503(a), (1) 6A-6.033311(1)	The school district shall provide parents with prior	<p><i>Records:</i></p> <p>1 of 4 records reviewed of</p>	

Standard/Citation	Findings	Supporting Evidence	Concerns
	<p>written notice a reasonable time before any proposal or refusal to initiate or change the identification, evaluation, educational placement of the student or the provision of a free appropriate public education to the student.</p>	<p>students in an elementary school, placement was changed from resource to regular class (change in FAPE) but IEP was not reviewed to reflect change and prior written notice was not provided to the parents of the student.</p> <p>1 of 6 records reviewed of students at the Charter School, placement was changed from self-contained to regular class (change in FAPE) but IEP was not reviewed to reflect change and prior written notice was not provided to the parents of the student.</p> <p>7 of 19 records reviewed of middle school students' class schedules reflected change in FAPE and/or a different placement than what was reported on their IEPs. Prior written notice was not provided to the parents of the students.</p> <p>1 of 19 records reviewed included a completed informed change of placement but IEP did not reflect change.</p>	

Standard/Citation	Findings	Supporting Evidence	Concerns
Related Factor: IEP Requirement/Implementation/Accountability			
	No findings of noncompliance.		<p>Lack of involvement of “Specials” teachers in the development of the IEP and knowing about or having copies of IEPs for accommodations.</p> <p>1 of 19 records reviewed included IEP planning notes from a 7900 course teacher who indicated that they were not aware that the student was ESE.</p> <p>4 of 7 teachers interviewed reported that GE teachers provide notes but do not routinely attend IEP meetings due to critical teacher shortage.</p>
Related Factor: Removal Standard/Placement			
6A-6.03028(6)(d)	That removal from the general education environment occurs only when the nature or severity of the disability is such that education in regular classes with the use of supplementary aids and services cannot be achieved satisfactorily is not evident from students’ IEPs.	<p>Records:</p> <p>For 10 of 19 IEPs, the explanation of the extent to which the student will not participate with non-disabled peers was inadequate; explanations did not address the reason the student’s IEP could not be implemented in the general education setting.</p>	<p>ESE Students placed in separate class setting have extremely limited interactions with their non-disabled peers.</p> <p>There does not appear to be a district-wide process or knowledge of procedures for informing the CARE team when students excel and</p>

Standard/Citation	Findings	Supporting Evidence	Concerns
		For 2 of 19 IEPs reviewed students were placed in self-contained class due to emotional needs but IEPs do not have social emotional goal.	warrant reevaluation. When SWDs transition from elementary school their IEPs are not routinely reviewed and changed to reflect actual placement in middle school. 7 of 7 IEPs reviewed of EMH students were placed in self-contained classrooms although one student was reported to be functioning at of slightly below grade level.
Indicator: Disproportionate Representation - EMH			
	No findings of noncompliance.		One student was staffed EMH with previous IQ scores of 92 on the Letter and 62 on the WPPSI
Indicator: Disproportionate Representation - EH			
	No findings of noncompliance.		Student found ineligible for EH although emotional difficulties remain evident at home and school.
Indicator: Participation in Statewide Assessment			
Related Factor: Alternate Assessment			
6A-1.0943(1)(a)(1)	FCAT exemption must be based on State Board of Education (SBE) rule.	Case Study: 4 of 5 students on special diploma were placed on alternate assessment due to lack	No options other than Standard Diploma and special diploma option 1 and 2.

Standard/Citation	Findings	Supporting Evidence	Concerns
		of academic out put and/or functioning below grade level.	
Indicator: Performance on Statewide Assessment			
Related Factor: FCAT Waiver/Other Options			
SP&P Part II G.2.m.			<p>Students in focus group reported drop out rate is related to inability to pass the FCAT.</p> <p>Interviews: 5 of 13 staff members indicated that FCAT Waivers are not discussed until the 12th grade or when it was apparent it is needed to graduate.</p> <p>8 of 13 staff members interviewed were unaware of what the FACT Waiver is.</p>
Indicator: Disproportionate Representation—Gifted			
	No findings of noncompliance.		<p>Screening tool may screen out students who demonstrate need for differentiated curriculum.</p> <p>Students who are twice exceptional do not have goals to address giftedness.</p>

Standard/Citation	Findings	Supporting Evidence	Concerns
Indicator: Behavior/ Discipline			
Related Factor: IEP Requirements/Implementation			
§300.324(a)(2)-(i) 6A-6.03027(6)(d)	In the case of a child whose behavior impedes the child's learning or that of others, consider the use of positive behavioral interventions and other strategies, to address that behavior.	Records: 5 of 9 records reviewed indicated need for positive behavior interventions or strategies, but supplemental aids or services were not addressed in IEP. In 1 of 9 records reviewed the need for social emotional goal was noted but not addressed in IEP.	1 of 9 records reviewed where student had 10 days OSS, notes indicated history of depression and anxiety but possible need for counseling was not addressed
Related Factor: Functional Behavioral Assessment (FBA)/Positive Behavior Intervention Plan (PBIP)			
6A-6.03312(4)(d)(1)	Either before or not later than ten business days after either first removing the student for more than ten school days in a school year or beginning with a removal that constitutes a change in placement, if the school district did not conduct a functional behavioral assessment (FBA) and implement a positive behavior intervention plan (PBIP) for the student before the behavior resulted in the removal, the IEP team must meet to develop	Records: 2 of 6 records reviewed of students who were removed from school for 10 or more days did not have FBAs or PBIPs. Interviews: 2 of 5 general education teachers interviewed reported PBIPs are not routinely reviewed following incidents of discipline. 6 of 10 ESE teachers interviewed reported PBIPs are	4 of 4 records reviewed of students placed in an intervention class and/or the Challenge to Change program did not have FBAs and PBIPs

Standard/Citation	Findings	Supporting Evidence	Concerns
	an assessment plan.	not reviewed and changed with significant interventions to readdress behaviors.	
Indicator: Dropout Rate			
Related Factor: General			
6A-6.0521(2)(c)	No findings of noncompliance.		
Indicator: Secondary Transition			
Related Factor: IEP Notice			
6A-6.03028(3)(b)	A written notice to parents must indicate the purpose, time and location of the meeting, and who, by title or position, will be attending.	Records: For 2 of 26 transition IEPs reviewed, notice of meeting did not identify who would be attending the meeting.	In 15 of 26 transition IEPs reviewed, no documentation of student attending meeting.
Related Factor: IEP Contents			
SPP Indicator 13	IEP includes coordinated, measurable, annual goals and transition services that will reasonably enable the student to meet the post-secondary goal(s).	Records: 5 of 26 transition IEPs did not have measurable annual goals. 6 of 26 transition IEPs did not have post-secondary goals identified.	
Matrix of Services			
S. 1011.62(1)(e), F.S.	Two matrix of service documents require correction due to inaccurate reporting.	Records: 2 of 14 IEPs/matrix of services documents for students reported at the 254 or 255 level were not reported accurately.	

Standard/Citation	Findings	Supporting Evidence	Concerns
Student Record Reviews			
34 CFR §300.320-300.520 Rule 6A-6.03028, FAC	Zero findings of noncompliance resulted in funding adjustments. 29 TP/IEP teams must reconvene to address identified findings.	Records: 252 IEPs were reviewed, in part or in whole 34 EPs were reviewed, in part or in whole	
Forms Review			
34 CFR §300. 34 CFR §300. Rule 6A-6.03028, FAC	5 forms require the district to make corrections. 5 forms have recommendations for the district to make changes.	15 forms were reviewed.	

System Improvement Plan

In response to these findings, the district is required to develop a system improvement plan for submission to the Bureau. This plan must include activities and strategies intended to address specific findings, as well as measurable evidence of change. In developing the system improvement plan, every effort should be made to link the system improvement activities resulting from this focused monitoring report to the district's targeted technical assistance needs identified through the State Performance Plan Indicator Teams. The promising practices, recommendations, and technical assistance resources included below should be considered when developing strategies and/or interventions targeting the critical issues identified by the Bureau as most significantly in need of improvement.

Promising Practices, Recommendations and Technical Assistance

Promising Practices

During the visit, numerous promising practices were noted by district and school staff and by Bureau and peer monitors. Some of the reported promising practices were school specific, some were grade specific, and others were the results of district-wide initiatives. The district is encouraged to continue to promote an atmosphere where teachers and staff can share these practices. Some of the reported promising practices are listed below.

- Ongoing relationship with Sarasota County Technical Institute (SCTI) for placement of students in vocational classes.
- Use of school-wide positive reinforcement behavioral programs.
- Mandatory Positive Learning Community (PLC) meetings allow grade level content area staff to collaborate and review student's academic and behavior concerns collectively.
- Use of Triad and Goodwill Academy to assist with children who are at risk of dropping out.
- District-wide use of the Children At Risk Educationally (CARE) Team, a multi-disciplinary team meeting that helps identify additional strategies and interventions prior to referral of evaluation.

Recommendations

Recommendations have been proposed for the district to consider when developing the system improvement plan and determining strategies that are most likely to effect change. The list is not all-inclusive, and is intended only as a starting point for discussion among the parties responsible for the development of the system improvement plan (SIP).

- Develop training to write accurate and complete present levels on EPs.
- Develop training to write measurable goals on IEPs.
- Develop training/monitor completion of Matrix of Services to ensure accurate rating.
- Develop training for general education teachers to ensure that ESE students receive accommodations listed on their IEPs without the student requesting them.

- Contact appropriate Program Development staff at DOE for information on providing services to students who are twice exceptional.
- Contact the Career Development and Transition (CDT) Project and the Transition to Independence Process (TIP) Project for assistance on how to development meaningful transition services for students with disabilities.
- Conduct periodic self-assessments of ESE programs across schools to ensure that IEPs are being implemented and that all information (e.g., time with nondisabled peers, ESE services) is reported accurately.
- Develop training modules that addresses the importance of general education and special education teacher collaboration in the development of IEPs in IEP training.
- Provide training and/or technical assistance to IEP team participants regarding placement decisions for students with disabilities, with a focus on removing the student from the general education setting only when the team has identified student-specific behaviors or skill levels that cannot be supported in the general classroom.
- Provide training and/or technical assistance to IEP teams to ensure that information regarding the FCAT waiver process is provided to families during IEP team meetings at which diploma options are addressed.

Technical Assistance

Bureau staff are available for assistance on a variety of topics. Staff may be contacted for assistance in the development and/or implementation of the system improvement plan. Following is a partial list of contacts:

ESE Program Administration and Quality Assurance—Monitoring
(850) 245-0476

Eileen L. Amy, Administrator
Eileen.Amy@fldoe.org

Ginny Chance, Program Director
Ginny.Chance@fldoe.org

Angela Nathaniel, Program Specialist
Angela.Nathaniel@fldoe.org

ESE Program Development and Services
(850) 245-0478

Cathy Bishop, Program Director
Cathy.Bishop@fldoe.org

Clearinghouse Information Center
cicbiscs@FLDOE.org
(850) 245-0477

Kathy Dejoie, Program Director
Kathy.Dejoie@fldoe.org

Special Programs Information, Clearinghouse, and Evaluation
(850) 245-0475

Karen Denbroeder, Administrator
Karen.Denbroeder@fldoe.org

**Sarasota County School District
Focused Monitoring
System Improvement Strategies**

The district is required to provide system improvement strategies to address identified findings of noncompliance, which may include an explanation of specific activities the district has committed to implementing, or it may consist of a broader statement describing planned strategies. For each issue, the plan also must define the measurable evidence of whether or not the desired outcome has been achieved. In addition to findings of noncompliance, the report includes areas of concern that the district is encouraged to address, either through this system improvement plan or through other avenues. Resources, suggestions and/or recommended actions are provided following this plan format.

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Findings of Noncompliance	Improvement Strategies/Interventions	Outcome Measures and Timeline
Indicator: LRE-PK		
Related Factor: IEP Requirements/Implementation		
The educational assignment of pre-kindergarten children with disabilities shall be provided in the least restrictive environment or those with milder delays, or in natural environments.	Pursuing cooperative agreements/contracts with community agencies. Continuing recruitment, negotiating salary supplements in critical shortage areas.	Follow deadline as indicated by SPP Indicator Team
Indicator: LRE 6-21		
Related Factor: Notice		
The school district shall provide parents with prior written notice a reasonable time before any proposal or refusal to initiate or change the identification, evaluation, educational placement of the student or the provision of a free appropriate public education to the student.	The district is required to address findings of noncompliance related to prior written notice of change of placement in its IEP training. By the beginning of the school year, district and/or school staff will conduct a review of a sampling of IEPs (10 records) at each school to ensure students' class schedules align with IEP placement and services.	District report of self-assessment reveals compliance with targeted elements for 100% of IEPs reviewed. September 2007 Submit a copy of the meeting notice, cover of IEP, copy of placement page, and services page for each IEP that was

Findings of Noncompliance	Improvement Strategies/Interventions	Outcome Measures and Timeline
	<p>At schools where school day schedules have been changed (block to periods or periods to block), each IEP must be reviewed to determine if the change in scheduled resulted in change in placement/change in FAPE and the IEP teams must reconvene to ensure appropriate services and placement.</p>	<p>reconvened due to change in placement and/or FAPE. June, 2007</p>
Related Factor: IEP Requirements/Implementation/Accountability		
<p>IEP shall be accessible to each person who is responsible for its implementation.</p> <p>Each teacher shall be informed of their specific responsibilities related to implementing the student's IEP and the specific accommodations, modifications, and supports.</p> <p>Areas of concern are noted in the body of the report.</p>	<p>If not already in place, the district is required to develop a policy, procedure, and or form to document assurance that all teachers responsible for implementing IEPS have received a copy of the document.</p> <p>The district is required to address findings of noncompliance in its IEP training.</p> <p><i>The district is encouraged to include strategies to address concerns noted in the body of this report.</i></p>	<p>District is to submit a copy of the policy, procedure, and/or form related to how teachers are informed of their responsibilities related to the implementation of an IEP.</p> <p>September, 2007</p>
Related Factor: Removal Standard/Placement		
<p>That removal from the general education environment occurs only when the nature or severity of the disability is such that education in regular classes with the use of supplementary aids and services cannot be achieved satisfactorily is not evident from students' IEPs.</p>	<p>Training and/or technical assistance regarding requirements for placement decisions will be incorporated into the general staff development activities for ESE staff.</p> <p>District and/or school staff will conduct periodic reviews of a sampling of IEPs (≥ 20 records) of students who are removed from the general education setting for part of the day to</p>	<p>District report of self-assessment reveals compliance with targeted elements for 100% of IEPs reviewed.</p> <p>September, 2007</p>

Findings of Noncompliance	Improvement Strategies/Interventions	Outcome Measures and Timeline
<p>Areas of concern are noted in the body of the report.</p>	<p>evaluate:</p> <ul style="list-style-type: none"> • sufficiency of explanations justifying removal • extent to which the present level of educational performance addresses all the needs related to the disability • correspondence among identified needs, goals and short-term objectives or benchmarks, and services provided. <p><i>The district is encouraged to include strategies to address concerns noted in the body of this report.</i></p>	
Indicator: Disproportionate Representation - EMH		
<p>No findings of noncompliance in this area.</p> <p>Areas of concern are noted in the body of the report.</p>	<p><i>The district is encouraged to include strategies to address concerns noted in the body of this report.</i></p>	
Indicator: Disproportionate Representation - EH		
<p>No findings of noncompliance in this area.</p> <p>Areas of concern are noted in the body of the report.</p>	<p><i>The district is encouraged to include strategies to address concerns noted in the body of this report.</i></p>	
Indicator: Participation in Statewide Assessment		
Related Factor: General and Alternate Assessment		
<p>FCAT exemption must be based on State Board of Education (SBE) rule.</p>	<p>The district will be required to target the requirements of SWA/FCAT exemption in its training on assessment participation and ensure</p>	<p>District reports of self-assessment reveals compliance in targeted areas of 100% of IEPs reviewed.</p>

Findings of Noncompliance	Improvement Strategies/Interventions	Outcome Measures and Timeline
<p>Areas of concern are noted in the body of the report.</p>	<p>the process for decision-making meets the state requirements.</p> <p>The district will be required to conduct a self-assessment of student records. The IEPs of 10% of the students on alternate assessment must be reviewed to determine if the exemption requirements of Rule 6A-6.10943, FAC, were followed.</p> <p><i>The district is encouraged to include strategies to address concerns noted in the body of this report.</i></p>	<p>September, 2007</p>
<p>Indicator: Performance on Statewide Assessment</p>		
<p>Related Factor: FCAT Waiver/Other Options</p>		
<p>Parents must be informed of the requirements for obtaining a waiver of the requirement to obtain a passing score on the FCAT to obtain a standard diploma.</p> <p>Areas of concern are noted in the body of the report.</p>	<p>The district will review the process of informing parents and students of the requirements for obtaining a waiver of the requirement to obtain a passing score on the FCAT to obtain a standard diploma. Based on that review, a procedure will be developed and implemented to ensure that parents and students are informed.</p> <p><i>The district is encouraged to include strategies to address concerns noted in the body of this report.</i></p>	<p>District to provide copy of the procedure of the process for informing parents and student of the requirements for obtaining a waiver of the requirements to obtain a passing score on the FCAT to obtain a standard diploma.</p> <p>September, 2007</p>
<p>Indicator: Disproportionate Representation - Gifted</p>		
<p>No findings of noncompliance in this area.</p> <p>Areas of concern are noted in the body of the report.</p>	<p><i>The district is encouraged to include strategies to address concerns noted in the body of this report.</i></p>	

Findings of Noncompliance	Improvement Strategies/Interventions	Outcome Measures and Timeline
Indicator: Behavior/ Discipline		
Related Factor: IEP Requirements/Implementation		
<p>In the case of a child whose behavior impedes the child’s learning or that of others, consider the use of positive behavioral interventions and other strategies, to address that behavior.</p> <p>Areas of concern are noted in the body of the report.</p>	<p>Training and/or technical assistance regarding requirements for the use of positive behavioral interventions will be incorporated into the general staff development activities for ESE, general education, and administrative staff.</p> <p>District and/or school staff will conduct reviews of a sampling of IEPs (≥ 10 records) of students who have been assigned >5 days of out-of-school suspension ensure that behavior intervention plans and other strategies are developed and implemented to address the behavior</p> <p>Following an analysis of the record review results, district staff will determine if additional training is required or targeted meet compliance.</p> <p><i>The district is encouraged to include strategies to address concerns noted in the body of this report.</i></p>	<p>District report of self-assessment reveals compliance with targeted elements for 100% of IEPs reviewed.</p> <p>September, 2007</p>
Related Factor: Functional Behavioral Assessment (FBA)/Positive Behavior Intervention Plan (PBIP)		
<p>Either before or not later than ten business days after either first removing the student for more than ten school days in a school year or beginning with a removal that constitutes a change in placement, if the school district did not</p>	<p>Training and/or technical assistance regarding functional behavior assessments and implementation of positive behavior intervention plans will be incorporated into the general staff development activities for ESE, general education, and administrative staff.</p>	<p>District report of self-assessment reveals compliance with targeted elements for 100% of IEPs reviewed.</p> <p>September, 2007</p>

Findings of Noncompliance	Improvement Strategies/Interventions	Outcome Measures and Timeline
<p>conduct a functional behavioral assessment (FBA) and implement a positive behavior intervention plan (PBIP) for the student before the behavior resulted in the removal, the IEP team must meet to develop an assessment plan.</p> <p>Areas of concern are noted in the body of the report.</p>	<p>District and/or school staff will conduct quarterly reviews of a sampling of IEPs (≥ 10 records) of students who have been assigned >10 days of out-of-school suspension ensure that manifestation determinations and functional behavior assessments are conducted and behavior intervention plans are developed and implemented.</p> <p>Following an analysis of the record review results, district staff will determine if targeted compliance was met or if additional training is required.</p> <p><i>The district is encouraged to include strategies to address concerns noted in the body of this report.</i></p>	
Indicator: Dropout Rate		
No findings of non-compliance.		
Indicator: Secondary Transition		
Related Factor: Notice		
<p>A written notice to parents must indicate the purpose, time and location of the meeting, and who, by title or position, will be attending.</p> <p>The notice must indicate the purpose of the meeting is the consideration of needed transition services for the student.</p>	<p>Training and/or technical assistance regarding notice requirements will be incorporated into the general staff development activities for ESE staff.</p>	<p>District will submit to the Bureau documentation of staff development activities for transition.</p> <p>September, 2007</p>
Related Factor: IEP Contents		

Findings of Noncompliance	Improvement Strategies/Interventions	Outcome Measures and Timeline
<p>IEP includes coordinated, measurable, annual goals and transition services that will reasonably enable the student to meet the post-secondary goal(s).</p>	<p>The IEP teams for the 13 identified students will reconvene to address identified noncompliance.</p> <p>Receive technical assistance on appropriate use of the Transition Checklist.</p> <p>Receive technical assistance from the Career Development and Transition (CDT) Project and the Transition to Independence Process (TIP) Project on the development of meaningful transition services for students with disabilities.</p> <p>Training regarding how to write measurable goals will be incorporated into the general staff development activities for ESE and general education staff.</p> <p>Using the Transition Checklist Protocol provided by the Bureau district and/or school staff will conduct quarterly self-assessments of a random sampling of 10 records per high school of students 16 and older to ensure that all transition requirements are addressed.</p> <p>Following an analysis of the record review results, district staff will determine if targeted compliance was met or if additional training is required.</p>	<p>Documentation of the reconvened IEPs with 100% compliance of targeted elements will be submitted to the Bureau by June 2007.</p> <p>District report of self-assessment reveals compliance with all targeted elements for 100% of IEPs reviewed.</p> <p>June 2007</p> <p>November 2007</p> <p>March 2008</p> <p>June 2008</p>

Findings of Noncompliance	Improvement Strategies/Interventions	Outcome Measures and Timeline
Matrix of Services		
Two matrix of service documents require review following review/revision of the corresponding IEPs.	District will submit both new IEPs and new matrixes for identified students to the Bureau for review and if needed, an amendment to the Automated Student Information System database.	
Record Reviews		
<p>Systemic findings of noncompliance on IEPs were related</p> <ul style="list-style-type: none"> • Lack of measurable goals • Lack of removal from the general education setting occurring only when the nature or severity of the disability is such that education in regular classes with supplementary aids and services cannot be achieved satisfactorily <p>Individual or non-systemic findings of noncompliance were noted on 17 additional IEP components.</p> <p>For 17 IEPs more than 50% of the annual goals were not measurable.</p> <p>There were no systemic findings of noncompliance for EPs.</p> <p>Individual or non-systemic findings of noncompliance were noted on 2 additional EP components.</p>	<p>The IEP teams for the identified students will reconvene to address identified findings.</p> <p>The identified noncompliant elements will be targeted in the district's IEP training.</p> <p>Pre-and post- training surveys will be conducted to determine perceived effectiveness of the training.</p> <p>Using protocols developed by the Bureau, school and/or district staff will conduct semi-annual compliance reviews of a random sample of 10 IEPs developed by staff who participated in the training session.</p>	<p>Documentation submitted and accepted by the Bureau within prescribed timeline.</p> <p>District report of self-assessment reveals compliance with targeted elements for 100% of IEPs reviewed.</p> <p>November 2007</p> <p>March 2008</p>

Findings of Noncompliance	Improvement Strategies/Interventions	Outcome Measures and Timeline
Forms Review		
<p>5 forms require the district to make corrections.</p> <p>Five forms have recommended changes.</p>	<p>The district will revise forms as required and submit them to the Bureau for review.</p> <p><i>The district is encouraged to address recommended changes noted in the body of this report.</i></p>	<p>August 2007</p>

Appendix A:
ESE Monitoring Team Members

**Florida Department of Education
Bureau of Exceptional Education and Student Services
2006-07 Focused Monitoring
Sarasota County School District**

ESE Monitoring Team Members

Department of Education Staff

Bambi J. Lockman, Chief, Bureau of Exceptional Education and Student Services
Eileen L. Amy, Administrator, ESE Program Administration and Quality Assurance
Ginny Chance, Program Director, ESE Program Administration and Quality Assurance

Angela Nathaniel, Program Specialist, Team Leader
Marilyn Hibbard, Program Specialist
Laura Harrison, Program Specialist
Barbara McAnelly, Program Specialist
Annette Oliver, Program Specialist

Peer Reviewers and Contracted Staff

Vickie Daniels, Highlands County School District
Carol Davis, Walton County School District
Ann Marie Dodd, Seminole County School District
Cynthia Groth, Broward County School District
Maureen Guarino, Bay County School District
Terri Hanley, Pinellas County School District
Willis Henderson, Escambia County School District
Deborah Johns, Polk County School District
Helen Nelson, Bay County School District
Kathy Nelson, Highlands County School District
Nancy Nielsen, Suwannee County School District
Rosemary Ragle, Walton County School District
Crystal Steward, Seminole County School District
Mary Beth Varner, Pinellas County School District
Melinda Young, Wakulla County School District

Appendix B:
Survey Results

**Florida Department of Education
Bureau of Exceptional Education and Student Services
2006-07 Focused Monitoring
Sarasota County School District**

Parent Survey Report: Students with Disabilities

FDOE has elected to use the 25-item scale from the National Center for Special Education Accountability Monitoring (NCSEAM) survey that addresses family involvement. Each family selected to be included in the annual sample received a mailed survey printed on an optical scan form accompanied by a cover letter explaining the importance of the survey and guaranteeing the confidentiality of the parent's responses. The packet also included a pre-addressed, postage-prepaid envelope for return of the survey. The survey was provided in three languages: English, Spanish, and Haitian-Creole.

Data from the surveys was scanned into an electronic database and sent to Dr. William Fisher, NCSEAM's measurement consultant, who analyzed the data and produced reports at both the state and LEA levels.

The parent survey was sent to parents of 4,345 students (PK-12) with disabilities in Sarasota County School District for whom complete addresses were provided by the district. A total of 512 parents, representing 11.8% of the sample, returned the survey. When applying the standard of measure indicating their perception of schools' facilitation of parental involvement, 25% of parents of children ages 3-21 reported their perceived level of satisfaction at or above the standard.

Appendix C:
Student Record Reviews

**Florida Department of Education
Bureau of Exceptional Education and Student Services
2006-07 Focused Monitoring
Sarasota County School District**

Student Record Reviews

Targeted or partial reviews of 252 student records of students with disabilities and 34 records of students identified as gifted were randomly selected from the population of ESE students and reviewed on-site in conjunction with student case studies. The records were from 15 schools in the district. Forty-one of the records represented transition IEPs for students aged 14 or older. The collected information related to additional compliance areas designated by the Bureau. In addition to IEP reviews, the Bureau conducted reviews of 14 matrix of services documents for students reported at the 254 or 255 funding level through the Florida Education Finance Program (FEFP). Any services claimed on the matrix must be documented on the IEP and must be in evidence in the classroom.

To be determined systemic in nature, an item must be found noncompliant in at least 25% of the records reviewed. For 17 IEPs more than 50% of the goals were not measurable, and IEP teams must be reconvened to address this finding. The district was notified of the specific students requiring reconvened IEP meetings in a letter dated February 28, 2007.

Systemic findings were made in the following areas:

- Lack of measurable goals
- Lack of removal from the general education setting occurring only when the nature or severity of the disability is such that education in regular classes with supplementary aids and services cannot be achieved satisfactorily

Individual or non systemic findings were noted in 17 additional areas.

- Lack of majority measurable annual goals
Lack of documented desired post school outcomes
- Lack of documentation of remediation needed to pass the FCAT
- Lack of goals and only one short-term objective
- Lack of involvement of general education or “special teachers” (Oak Park School) in the development of IEPs
- Lack of informed change of placement
- Lack of accurate identification of placement
- Lack of teachers’ being informed of needs and accommodations of students with disabilities
- Lack of accurate documentation of ESE services
- Inaccurate or inappropriate documentation of diploma option on IEPs
- Lack of completed goals, benchmarks, and/or criteria
- Lack of appropriate documentation on frequency of services
- Students who are twice exceptional do not have gifted goals
- Lack of benchmarks or short-term objectives

- Lack of identification of position or title of persons invited to the IEP meeting on the invitations
- Lack of measurable post-secondary goals
- Lack of documented involvement of general education teachers in the development of IEPs
- Lack of positive behavioral interventions, strategies, and supports to address that behavior for students whose behavior impedes learning

Of the 34 EPs reviewed, there were no systemic findings of noncompliance. Individual or non systemic findings were as follows:

- Lack of documentation of PLEP, goals and benchmarks/short-term objectives, specially designed instruction, how the student's progress toward goal is measured and reported to parent, initiation of services, frequency, location, and duration of services.
- Lack of EP goals for twice exceptional students whose primary exceptionality is gifted.

Appendix D:
Glossary of Acronyms

**Florida Department of Education
Bureau of Exceptional Education and Student Services
2006-07 Focused Monitoring
Sarasota County School District**

Glossary of Acronyms

Bureau	Bureau of Exceptional Education and Student Services
CARE	Children at Risk Educationally
CDT	Career Development and Transition
CFR	Code of Federal Regulations
DJJ	Department of Juvenile Justice
DOE	Department of Education
EH	Emotionally Handicapped
EMH	Educable Mentally Handicapped
EP	Educational Plan
ESE	Exceptional Student Education
F.S.	Florida Statutes
FAC	Florida Administrative Code
FAPE	Free Appropriate Public Education
FBA	Functional Behavioral Assessment
FCAT	Florida Comprehensive Assessment Test
GE	General Education
GED	General Educational Development diploma
IDEA	Individuals with Disabilities Education Act
IEP	Individual Educational Plan (for students with disabilities)
LEA	Local Educational Agency
LRE	Least Restrictive Environment
NCLB	No Child Left Behind
NCSEAM	National Center for Special Education Accountability Monitoring
OCR	Office for Civil Rights
OSEP	Office of Special Education Programs (USDOE)
OSS	Out of School Suspension
PBIP	Positive Behavior Intervention Plan
PK	Pre-kindergarten
PLC	Positive Learning Center
RtI	Response to Intervention
SBE	State Board of Education
SCTI	Sarasota County Technical Institute
SIP	System Improvement Plan
SPP	State Performance Plan
SP&P	Special Programs & Procedures for the Provision of Specially Designed Instruction
SWD	Students with Disabilities
TIP	Transition to Independence Process
U.S.C.	United States Code