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June 20, 2008

Mr. David Miller, Superintendent
Wakulla County School District
P.O. Box 100
Crawfordville, FL 32326-0100

Dear Mr. Miller:

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 Wakulla 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. Due to the nature and/or extent of student-specific noncompliance and the availability of staff and/or resources to correct the findings, Wakulla County School District requested and was granted an extension for completion of required activities; a final due-date was established as May 19, 2008. All individual incidents of noncompliance were timely corrected; the district's CAP was provided on April 29, 2008, and verifying documentation was provided to the Bureau on May 14, 2008.

Wakulla County was required to assess 67 standards. One or more incidents of noncompliance were identified on 21 of those standards (31%). The following is a summary of Wakulla County School District's correction of student-specific incidents of noncompliance:

Correction of Noncompliance by Student

	Number	Percentage
Records Reviewed/Protocols Completed	40	–
Total Items Assessed	1132	–
Noncompliant	107	9%
Timely Corrected	107	100%

The *Wakulla 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. Wakulla County School District's CAP was submitted to the Bureau for review and approval, and is provided in Attachment 2. Please note that a timeline for implementation, evaluation, and reporting of results on the part of the district is included in the CAP. Your district's adherence to this schedule is required in order to ensure correction of systemic noncompliance within a year as required by OSEP and Florida's SPP.

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

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

Sincerely,



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

Attachments

cc: Tanya English
Frances Haithcock
Kim C. Komisar
Annette Oliver
Sheila Gritz
Elise Lynch

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

**ESE Self-Assessment
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Wakulla 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 EX protocols completed: 20
 Number of standards per EX: 33
 Number of STA protocols completed: 4
 Number of standards per STA: 6
 Number of STB protocols completed: 16
 Number of standards per STB: 28

Total number of protocols: 40
 Total number of standards: 1132
 Total number of incidents of noncompliance (NC): 107
 Overall % incidents of noncompliance: 9%

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.

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Wakulla District Summary Report: Findings of Noncompliance by Standard

Noncompliance (NC)		*Correctable for the Student(s)	**Individual CAP	# NC	% NC	***Systemic CAP
EX-2	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		9	45.0%	X
EX-3	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		7	35.0%	X
EX-6	The IEP contains a statement of supplementary aids and services, including location and anticipated initiation, duration and frequency. (34 CFR 300.320(a)(4) and (7))	X		1	5.0%	
EX-10	The IEP contains a statement of appropriate accommodations necessary to measure academic achievement and functional performance on state or district-wide assessments. (34 CFR 300.320(a)(6)(i))	X		4	20.0%	
EX-15	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	5.0%	
EX-17	The IEP team considered, in the case of a student with limited English	X		1	5.0%	

Noncompliance (NC)		*Correctable for the Student(s)	**Individual CAP	# NC	% NC	***Systemic CAP
	proficiency, the language needs of the student as they relate to the IEP. (34 CFR 300.324(a)(2)(ii))					
EX-18	The IEP team considered, in the case of a student who is blind or visually impaired, that provision is made for instruction in Braille and other use of Braille. (34 CFR 300.324(a)(2)(iii))	X		1	5.0%	
EX-19	The IEP team considered the communication needs of the child, including, for a student who is deaf/hard of hearing, consideration of the student's opportunities for direct communication with peers and professional personnel in the student's mode of communication and the need for instruction in the student's language and communication mode. (34 CFR 300.324(a)(2)(iv))	X		1	5.0%	
EX-24	If a student has had at least five unexcused absences, or absences for which the reasons are unknown, within a calendar month or 10 unexcused absences or absences for which the reason is unknown, within a 90-calendar-day period, the student's primary teacher must report that the student may be exhibiting a pattern of nonattendance. Unless there is clear evidence otherwise, the student must be referred to the school's child study team. If an initial meeting does not resolve the problem, interventions must be implemented. (S. 1003.26(1), F.S.)	X		8	40.0%	X
EX-26	The district notified the parent of the removal decision and provided the parent with a copy of the notice of the procedural safeguards on the same day as the date of the removal decision. (34 CFR 300.530(h); Rule 6A-6.03312(4)(a), FAC.)		X	1	5.0%	
EX-27	The IEP team considered all relevant evaluation and diagnostic information to determine whether the behavior was a manifestation of the student's disability. (34 CFR 300.530(e)(1); Rule 6A-6.03312(3)(a), FAC.)		X	1	5.0%	
EX-29	If the IEP team determined that the behavior was a manifestation of the		X	1	5.0%	

Noncompliance (NC)		*Correctable for the Student(s)	**Individual CAP	# NC	% NC	***Systemic CAP
	student's disability, the student was returned to the current placement, unless the parent and the district agree to a change in placement as part of the behavior intervention plan or unless the behavior is related to weapons, drugs, or serious bodily injury. (34 CFR 300.530(f) and (g))					
EX-30	If the IEP team determined that any deficiencies related to the student's IEP or its implementation identified during the review under EX-28, those deficiencies were remedied. (34 CFR 300.530(e)(3))	X		1	5.0%	
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		16	100.0%	X
STB-10	The measurable postsecondary goals were based on age-appropriate transition assessment(s). (34 CFR 300.320(b)(1))	X		16	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		16	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	12.5%	
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	12.5%	
STB-14	If transition services are likely to be provided or paid for by another agency, a representative of the agency was invited to participate in the IEP.	X		1	6.3%	

Noncompliance (NC)		*Correctable for the Student(s)	**Individual CAP	# NC	% NC	***Systemic CAP
	(34 CFR 300.321(b)(3))					
STB-15	The district obtained consent from the parent or from the student whose rights have transferred prior to inviting to the IEP team meeting a representative of an agency likely to provide or pay for transition services. (34 CFR 300.321(b)(3))		X	1	6.3%	
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		16	100.0%	X

Florida Department of Education
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**ESE Self-Assessment
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Wakulla County School District Corrective Action Plan

#	Findings of Noncompliance	Activities	Timelines	Resources	Results/Status
EX-2	<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. (34 CFR 300.320(a)(1); Rule 6A-6.03028(7)(a), FAC.)</p>	<p>The IEP was revised to include an FCAT specific drop down menu of research based academic/functional criteria for teachers to use in developing present level statements.</p> <p>Training will be provided to all ESE teachers in using data to write present level statements and remediation needed to achieve a passing score on state assessments.</p> <p>All IEP's will be read by district staff to insure compliance with EX-2, 3, and 24</p>	<p>4/08</p> <p>4/08 – 10/08</p> <p>5/08 – 10/08</p>	<p>District Staff</p> <p>Maximus</p> <p>District Staffing Specialists</p> <p>Staffing Specialist and Transition Specialist</p>	
EX-3	<p>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>	<p>Developed a sample of measurable goals (both academic and functional) as well as appropriate objectives/benchmarks.</p> <p>Provided copies and training to all ESE teachers.</p> <p>Will be included in Grey Book Procedures Manual and will provide training to new ESE teachers</p>	<p>4/08</p> <p>5/08</p> <p>8/08</p>	<p>Transition Specialist/District Staffing Specialists</p>	
EX-24	<p>If a student has had at least five unexcused absences, or absences for which the reasons are unknown, within a</p>	<p>Modified district form for referral to child study team to include absenteeism and results of meeting.</p>	<p>4/08</p>	<p>District Staff</p>	

#	Findings of Noncompliance	Activities	Timelines	Resources	Results/Status
	<p>calendar month or 10 unexcused absences or absences for which the reason is unknown, within a 90-calendar-day period, the student's primary teacher must report that the student may be exhibiting a pattern of nonattendance. Unless there is clear evidence otherwise, the student must be referred to the school's child study team. If an initial meeting does not resolve the problem, interventions must be implemented. (S. 1003.26(1), F.S.)</p>	<p>Will share form with school administrators and review district attendance policy regarding tracking/notification of absenteeism.</p> <p>Will train guidance counselors to use the new form, collect data and document follow-up interventions.</p>	<p>6/08</p> <p>8/08</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 IEP transition page to clearly designate the measurable post-secondary goal.</p> <p>Provided samples of goals and training in writing to high school ESE teachers.</p> <p>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.</p> <p>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.</p> <p>All secondary IEPs will be monitored by district staff to insure compliance with STB-9, 10, 11 and 16</p>	<p>4/08</p> <p>4/08 – 5/08</p> <p>4/08 – 10/08</p> <p>10/08</p>	<p>Transition Specialist</p> <p>Staffing Specialists</p> <p>High School Transition Specialist; Big Bend Transition Council</p> <p>Staffing Specialist and/or Transition Specialist</p>	

#	Findings of Noncompliance	Activities	Timelines	Resources	Results/Status
STB-10	<p>The measurable postsecondary goals were based on age-appropriate transition assessment(s). (34 CFR 300.320(b)(1))</p>	<p>Revised IEP to include dropdown menu of age appropriate transition assessments for teachers to use (ex. FCAT, strands, FBA, TABE, etc.)</p> <p>The Transition Assessment Resource Mapping chart mentioned above under #3 will be utilized to designate not only assessments available in the school system, but also the local agencies.</p>	4/08	<p>District Staff</p> <p>Resource Mapping chart from BBTC; Transition Center at UF</p>	
STB-11	<p>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))</p>	<p>Provided training to high school teachers in writing objectives to align with post secondary goals.</p>	4/08 – 5/08	<p>Transition Specialist</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>Developed a Release for Information Participation form to include other agencies at IEP meetings.</p> <p>Provided training to all high school teachers in writing measurable transition goals and using Release of Information forms to include appropriate agencies at IEP meetings.</p>	<p>4/08</p> <p>4/08 – 5/08</p>	<p>District Staff</p> <p>Transition Specialist</p>	