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June 20, 2008

Ms. Carlene Anderson, Superintendent
Walton County School District
145 Park Street, Suite 3
DeFuniak Springs, Florida 32433-3344

Dear Ms. Anderson:

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

Walton County was required to assess 56 standards. One or more incidents of noncompliance were identified on 21 of those standards (38%). The following is a summary of Walton County School District's correction of student-specific incidents of noncompliance:

Correction of Noncompliance by Student

	Number	Percentage
Records Reviewed/Protocols Completed	20	—
Total Items Assessed	560	—
Noncompliant	79	14%
Timely Corrected	79	100%

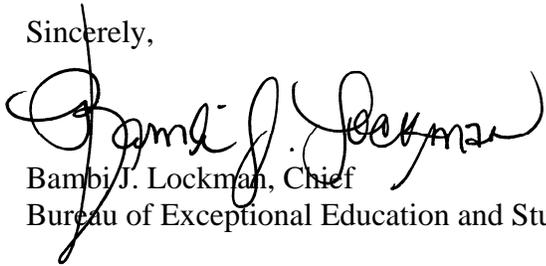
The *Walton District Summary Report: Findings of Noncompliance by Standard* (Attachment 1) contains a summary of the findings reported by the individual standard or regulation assessed. These data include revisions to the preliminary report that resulted from the validation review. Systemic findings 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. Walton 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: Rosemary Ragle
Frances Haithcock
Kim C. Komisar
Ken Johnson
Sheila Gritz

Florida Department of Education
Bureau of Exceptional Education and Student Services

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Walton 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 LRE protocols completed: 15
Number of standards per LRE: 28
Number of STB protocols completed: 5
Number of standards per STB: 28

Total number of protocols: 20
Total number of standards: 560
Total number of incidents of noncompliance (NC): 79
Overall % incidents of noncompliance: 14%

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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Walton District Summary Report: Findings of Noncompliance by Standard

Noncompliance (NC)		*Correctable for the Student(s)	**Individual CAP	# NC	% NC	***Systemic CAP
STB-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		4	80.0%	X
STB-4	For students aged 14 and older: <ul style="list-style-type: none"> • The IEP contains a statement of the student's desired post-school outcome • A statement of the student's transition service needs is incorporated into applicable components of the IEP • The IEP team considered the need for instruction in the area of self determination. (Rule 6A-6.03028(7)(i), FAC.)	X		5	100.0%	X
STB-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	20.0%	
STB-6	If an agency likely to provide or pay for transition services is involved: <ul style="list-style-type: none"> • A team member or designee was designated as responsible for follow-up with the agency • The IEP team was reconvened to identify alternative strategies if the agency failed to provide services as indicated on the IEP. 	X		2	40.0%	X

Noncompliance (NC)		*Correctable for the Student(s)	**Individual CAP	# NC	% NC	***Systemic CAP
	(34 CFR 300.324(c)(1); Rule 6A-6.03028(8)(d), FAC.)					
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		5	100.0%	X
STB-10	The measurable postsecondary goals were based on age-appropriate transition assessment(s). (34 CFR 300.320(b)(1))	X		5	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		5	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		5	100.0%	X
STB-13	The transition services include course(s) of study that focus on improving the academic and functional achievement of the student to facilitate the student's articulation from school to post-school. (34 CFR 300.320(b)(2))	X		4	80.0%	X
STB-16	The IEP includes coordinated, measurable, annual IEP goals and transition service that will reasonably enable the student to meet the postsecondary goals. (34 CFR 300.320(b))	X		5	100.0%	X
LRE-6	The appropriate team members were present at the IEP meeting. (34 CFR 300.321(a)-(b))	X		2	13.3%	
LRE-7	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	X		3	20.0%	

Noncompliance (NC)		*Correctable for the Student(s)	**Individual CAP	# NC	% NC	***Systemic CAP
	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.)					
LRE-8	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		6	40.0%	X
LRE-10	The IEP contains a statement of related services, including location and anticipated initiation, duration and frequency. (34 CFR 300.320(a)(4) and (7))	X		1	6.7%	
LRE-11	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		3	20.0%	
LRE-12	The IEP contains a statement of program modifications or classroom accommodations, including location and anticipated initiation, duration and frequency. (34 CFR 300.320(a)(4) and (7) and Rule 6A-6.03028(7)(c), FAC.)	X		3	20.0%	
LRE-13	The IEP contains a statement of supports for school personnel. (34 CFR 300.320 (a)(4))	X		2	13.3%	
LRE-14	There is alignment among the present level of academic and functional performance statement, the annual goals and short term objectives/benchmarks, and the services identified on the IEP. (34 CFR 300.320(a))	X		2	13.3%	
LRE-15	The student participates in nonacademic and extracurricular services and activities with nondisabled students to the maximum extent appropriate.	X		9	60.0%	X

Noncompliance (NC)		*Correctable for the Student(s)	**Individual CAP	# NC	% NC	***Systemic CAP
	(34 CFR 300.107 and 300.117)					
LRE-17	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		6	40.0%	X
LRE-18	The IEP contains descriptions of how progress toward annual goals will be measured including how often parents will be regularly informed of their child's progress. Parents of disabled students must be informed of this progress at least as often as parents of nondisabled students. (34 CFR 300.320(a)(3); Rule 6A-6.03028(7)(g), FAC.)	X		1	6.7%	

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

**ESE Self-Assessment
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Walton County School District Corrective Action Plan

#	Findings of Noncompliance	Activities	Timelines	Resources	Results/Status
STB-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>Presentation at Principals' meeting to report on impending Focused Self-Assessment and LEA Determination. Request that compliance be included in any ESE teacher's professional development plan.</p> <p>Revise IEP to reflect all transition components included in newly revised compliance manual.</p> <p>District-wide training for elementary and selected secondary ESE teachers in the Self-Assessment process, and in the development of a compliant IEP that includes required components and measurable goals.</p> <p>District-wide training for all secondary ESE teachers in the development of transition IEP to include measurable postsecondary goals and annual goals.</p>	<p>September 27, 2007</p> <p>October 2007 through January 2008.</p> <p>November 2, 2007</p> <p>January 29, 2008</p>	<p>Memorandum containing criteria for LRE Determination and suggested language to be included in teachers' professional development plans.</p> <p>Draft Compliance Manual and Assessment protocols. Exceptional Student Education Compliance Self-Assessment: Processes and Procedures Manual received January 23, 2008. Self-Assessment Protocols. Revised IEP document. Consultation with pertinent DOE personnel.</p>	<p>Completed September 2007. Results of Self-Assessment submitted in January 2008 indicate that the activity was most ineffective.</p> <p>Completed in January 2008. Status to be determined upon submission of corrected products.</p> <p>Completed in November 2007. Results of Self-Assessment submitted in January 2008 indicate that the activity was ineffective.</p> <p>Completed January 2008. Status to be determined April 25, 2008.</p>

#	Findings of Noncompliance	Activities	Timelines	Resources	Results/Status
		<p>Begin corrective action based on submission of Self-Assessment to DOE on January 29, 2008.</p> <p>Presentation by Superintendent to Principals of Self-Assessment findings.</p> <p>Training opportunities for ESE teachers.</p>	<p>January 2008 through April 25, 2008.</p> <p>February 22, 2008</p> <p>March through December 2008.</p>	<p>Report of Findings from Self-Assessment submitted January 2008.</p> <p>Self-Assessment Report</p> <p>ESE Transition online training module.</p> <p>Trainings provided via Project Connect.</p> <p>What Everyone Needs to Know About Delivering Transition Services – training provided by Transition Center and FDLRS.</p> <p>Secondary Transition Materials, National Secondary Transition Technical Assistance Center, OSEP. – provided to all secondary ESE teachers.</p>	<p>Ongoing. Status to be determined.</p> <p>Completed February 2008. Status to be determined.</p>

#	Findings of Noncompliance	Activities	Timelines	Resources	Results/Status
STB-4	<p>For students aged 14 and older:</p> <ul style="list-style-type: none"> • The IEP contains a statement of the student’s desired post-school outcome • A statement of the student’s transition service needs is incorporated into applicable components of the IEP • The IEP team considered the need for instruction in the area of self determination. <p>(Rule 6A-6.03028(7)(i), FAC.)</p>	<p>Meeting scheduled with superintendent and all principals in April to develop plan for accountability at the school site.</p> <p>Request the superintendent to encourage the participation of principals at the upcoming legal conference in April at PAEC presented by ISRD: <i>What Successful Principals Do – The Legal Aspects of Special Education</i></p>	<p>April 2008 August 2008</p> <p>April 22, 2008</p>	<p>Corrective Action Plan FLDOE Report of Self Assessment</p> <p>Materials provided by Julie Weatherly, Resolutions in Special Education.</p>	
STB-6	<p>If an agency likely to provide or pay for transition services is involved:</p> <ul style="list-style-type: none"> • A team member or designee was designated as responsible for follow-up with the agency • The IEP team was reconvened to identify alternative strategies if the agency failed to provide services as indicated on the IEP. <p>(34 CFR 300.324(c)(1); Rule 6A-6.03028(8)(d), FAC.)</p>	<p>As noted above.</p>	<p>As noted above.</p>	<p>As noted above.</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>As noted above.</p>	<p>As noted above.</p>	<p>As noted above.</p>	
STB-10	<p>The measurable postsecondary goals were based on age-appropriate transition assessment(s). (34 CFR 300.320(b)(1))</p>	<p>As noted above.</p>	<p>As noted above.</p>	<p>As noted above.</p>	

#	Findings of Noncompliance	Activities	Timelines	Resources	Results/Status
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))	As noted above.	As noted above.	As noted above.	
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))	As noted above.	As noted above.	As noted above.	
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))	As noted above.	As noted above.	As noted above.	
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))	As noted above.	As noted above.	As noted above.	
LRE-8	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))	Three training Activities are planned for writing measurable annual goals, including academic and functional goals, and short-term objectives or benchmarks. These activities will be provided to teachers of preschool students with disabilities in collaboration with CARD, PKD Program Facilitator, SLP, and PKD Resource Specialist. Other topics to be addressed: Carolina Curriculum, PECS, engineered classroom w/visual schedules, and the use of ABBLs.	March – May 2008.	TATS Materials including but not limited to <u>Administrators' Walkthrough Checklist for Pre-K Classrooms</u> , Carolina Curriculum, ABLLS, Visual Schedules/engineered classroom, <u>Preparing Instructional Objectives by R.F. Mager, Annual Goals Make the Measurable</u> , FDOE 2005, <u>Writing</u>	Session 1 completed on March 14; second session on April 14; third session on May 14.

#	Findings of Noncompliance	Activities	Timelines	Resources	Results/Status
		one or both of the existing elementary schools.			
LRE-17	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))	See training activities noted above.	See above	See above	Ongoing.