

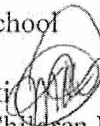
DEPARTMENT OF EDUCATION

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401 Federal Street Suite 2
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DOE WEBSITE: <http://www.doe.k12.de.us>

Mark T. Murphy
Secretary of Education
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MEMORANDUM

TO: Catherine Balsley
Campus Community School

FROM: Mary Ann Mieczkowski 
Director, Exceptional Children Resources

DATE: July 29, 2015

RE: Special Education Compliance Monitoring 2014-2015
Indicator 13 Transition Planning

The Department of Education ("DOE") is responsible for monitoring local education agencies ("LEAs") for special education compliance under IDEA, including transition services for students with disabilities (indicator 13). DOE must report annually to the Office of Special Education Programs (OSEP) the percent of youth with IEPs aged 16 and above with an IEP that includes appropriate measurable postsecondary goals that are annually updated and based upon an age appropriate transition assessment, transition services, including courses of study, that will reasonably enable the student to meet those postsecondary goals, and annual IEP goals related to the student's transition service needs. There also must be evidence that the student was invited to the IEP Team meeting where transition services are to be discussed and evidence that, if appropriate, a representative of any participating agency was invited to the IEP Team meeting with the prior consent of the parent or student who has reached the age of majority. Regulation: 20 U.S.C. 1416(a)(3)(B) the Individuals With Disabilities Education Act ("IDEA") and corresponding state regulations.

Since Delaware Regulations state transition services must begin with the earlier of the first IEP to be in effect when the child turns fourteen (14) or enters the eighth (8th) grade, or younger if determined appropriate by the IEP team, the DOE reviews all transition aged IEPs for Indicator 13 reporting.

DOE's Monitoring Activities

As Delaware engages in results-driven accountability there is a need to provide a comprehensive status of where Delaware stands in providing transition planning and services for students with disabilities. Thus, DOE began implementing a new monitoring process for Indicator 13 this year. Beginning with the 2014-2015 school year all districts and charters having transition age (age 14 or in the 8th grade) students will be monitored for Indicator 13 each year. The following process is now being implemented in a two-phase process:

Phase 1 – LEA Self-Assessment

- LEAs will be required to conduct a self-assessment of all IEPs for students age 14 or in the 8th grade and above for transition planning and services in the fall.
(In the fall of 2014, DOE provided LEAs with an electronic spreadsheet to capture all data. LEA self-assessment data was submitted to DOE on March 1, 2015).

Phase 2 – DOE Validation of LEA Submitted Data

- DOE will review a representative sample of the submitted data for validation. All secondary schools will be included in the verification process.

DOE will complete the validation process. If any individual non-compliance in transition planning and services is found, the LEA will move into the Prong1/Prong 2 monitoring process according to the OSEP 09-02 memo in which the Federal DOE outlines requirements for states to conduct two phases of monitoring activities.

A. Prong 1 – Student Level Corrective Action

As mentioned, all noncompliance must be corrected at the individual student level, and is described in Section 3 of the Monitoring Report. The LEA is responsible for submitting Section 3 of the Monitoring Report documenting completion of all individual student corrections to the DOE no later than **September 30, 2015**. The DOE will review the individual student records to verify completion of required corrections.

Note that the correction of IEPs is not required if: (a) the student is no longer enrolled in the LEA; (b) the student was dismissed from receiving special education services; or (c) the student no longer attends school due to graduation or other reasons. The Monitoring Report contains a section for your LEA to report when these circumstances occur.

Additional corrective actions may also be required, such as staff training, depending on the root cause of the non-compliance.

B. LEA Level Corrective Action

The DOE will be reviewing records for the regulatory transition item that is less than 100% compliant. The percentage levels for your LEA are found in Section 4 of the Monitoring Report. Before starting any corrective actions, the LEA must conduct a Root Cause Analysis to identify the specific reasons the problem exists within the LEA. Depending on the reasons identified, the LEA should then tailor specific action steps to remedy the problem. Corrective actions can include, but are not limited to, self-audits and LEA review of student records, review of compliance data by teacher/school, specific trainings for targeted staff, and review of policies and practices at the LEA and school levels. Your staff should discuss plans and technical assistance options with the DOE team assigned to your LEA. The LEA's signed Corrective Action Plan will be due to DOE on or before **August 28, 2015**

Note, the DOE is requiring each LEA to provide training to staff in the transition areas in which compliance is below 100%. The training should be specifically developed by each LEA to ensure staff will be properly implementing the regulations. "Training" can include: (a) presentations to staff by an expert or consultant in special education regulations; (2) distribution of written materials to staff; and/or (3) use of technical assistance documents and professional development modules sanctioned and approved by the U.S. Department of Education.

The DOE team will monitor the Corrective Action Plan developed by the LEA and review a timeline for submitting updates to the DOE. We are asking LEAs to report to the DOE on the completion of their corrective actions no later than **October 30, 2015**.

C. Prong 2 – State Verification Action

DOE will conduct a Prong 2 verification as part of the next cycle of compliance monitoring which will occur in the fall of 2015.

D. Indicator 13 Findings

As a result of the review of you LEA's data, the Department has determined your LEA is 75% compliant with federal Indicator 13 requirements. Areas of identified noncompliance are listed on the attached document by student name.

Summary

In closing, we hope that this memorandum is helpful to you. As always, we appreciate the cooperation, commitment, and courtesy displayed by your staff throughout the monitoring process.

Following is a review of the timeline for actions due to the DOE:

1. Meeting with DOE	By August 28
2. Completed and signed Corrective Action Plan due to DOE	August 28
3. Individual student corrections completed	September 30
4. Completion of all corrective actions	October 30

As your LEA works through its corrective action steps, please be sure to direct your questions and comments to Dale Matusevich at dale.matusevich@doe.k12.de.us or me at maryann.mieczkowski@doe.k12.de.us. Thank you and we look forward to working with you throughout the year.

cc: Mark T. Murphy, Secretary of Education
Michael Watson, Chief Academic Officer, Teaching and Learning
Jennifer Nagourney, Executive Director, Charter Schools
Leroy Travers, Special Education
Sarah Celestin, Education Associate

*Delaware Department of Education
Exceptional Children Resources*

*Campus Community Charter School
Indicator 13*

Compliance Monitoring: Tracking the Correction of Student Level Citations

Date of Notification:

Corrections Due by: September 30, 2015

Directions for Correcting IDEA Individual Student Noncompliance Citations

Step 1: The Local Education Agency ("LEA") is required to correct all instances of noncompliance for each student where noncompliance was identified. LEA Validator must fill in the Corrective Action Code and the date of correction for each student prior to submitting this report to Delaware Department of Education ("DE DOE"). This page must be signed with the name and date of the LEA Validator.

Corrective Action Code:

- 0 = Correction not yet made
- 1 = Correction has been made as required for this student
- 2 = Student no longer enrolled in LEA
- 3 = Student no longer receives special education services
- 4 = Student no longer in school (graduation, dropout, deceased)

Step 2: LEA Validator must submit this completed form and other evidence (as required) to DE DOE Compliance Monitor.

Step 3: DE DOE Compliance Monitor must verify that the findings of noncompliance have been corrected as per the LEA report. DE DOE Compliance Monitor must include his/her name and date of verification when all noncompliance has been verified as corrected.

LEA Action Log

Verification of Correction

Signature of LEA Validator	Date of Signature	Signature of DE DOE Validator	Date of Signature

STR 5		For students of transition age:		Corrective Action	Student Level: Revise the IEP to include appropriate transition activities and services. LEA Level: (<95%) Provide training to appropriate staff. Provide documentation of the above to DOE.			
14 DE Admin Code §925.20		IEP contains an appropriate measurable postsecondary goal based upon age appropriate transition assessments related to employment after high school						
34 CFR §300.320								
Student Demographic Information				School	LEA Verification of Correction		DE DOE Verification of Correction	
Student Date of Birth	First Name	Last Name	Attendance Center	Corrective Action Code	Signature of LEA Validator	Date of Correction	Signature of DE DOE Validator	Date of Verification
STR 6		For students of transition age:		Corrective Action	Student Level: Revise the IEP to include appropriate transition activities and services. LEA Level: (<95%) Provide training to appropriate staff. Provide documentation of the above to DOE.			
14 DE Admin Code §925.20		IEP contains an appropriate measurable postsecondary goal based upon age appropriate transition assessments related to education OR training after high school						
34 CFR §300.320								
Student Demographic Information				School	LEA Verification of Correction		DE DOE Verification of Correction	
Student Date of Birth	First Name	Last Name	Attendance Center	Corrective Action Code	Signature of LEA Validator	Date of Correction	Signature of DE DOE Validator	Date of Verification

*Delaware Department of Education
Exceptional Children Resources*

<Name of School District or Charter School>

Indicator 13

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LEA Action Log

Verification of Correction			
Signature of LEA Validator	Date of Signature	Signature of DE DOE Validator	Date of Signature

STR 5 14 DE Admin Code §925.20 34 CFR §300.320		For students of transition age: IEP contains an appropriate measurable postsecondary goal based upon age appropriate transition assessments related to employment after high school		Corrective Action	Student Level: Revise the IEP to include appropriate transition activities and services. LEA Level: (<95%) Provide training to appropriate staff. Provide documentation of the above to DOE.			
Student Demographic Information			School		LEA Verification of Correction		DE DOE Verification of Correction	
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Student Date of Birth	First Name	Last Name	Attendance Center	Corrective Action Code	Signature of LEA Validator	Date of Correction	Signature of DE DOE Validator	Date of Verification
STR 7 14 DE Admin Code §925.20 34 CFR §300.320		For students of transition age: IEP contains an appropriate measurable postsecondary goal based upon age appropriate transition assessments related to independent living after high school		Corrective Action	Student Level: Revise the IEP to include appropriate transition activities and services. LEA Level: (<95%) Provide training to appropriate staff. Provide documentation of the above to DOE.			
Student Demographic Information			School		LEA Verification of Correction		DE DOE Verification of	

							Correction	
Student Date of Birth	First Name	Last Name	Attendance Center	Corrective Action Code	Signature of LEA Validator	Date of Correction	Signature of DE DOE Validator	Date of Verific ation

STR 8 14 DE Admin Code §925.20 34 CFR §300.320		For students of transition age: IEP contains courses of study to assist Student in reaching postsecondary goals		Corrective Action	Student Level: Revise the IEP to include appropriate transition activities and services. LEA Level: (<95%) Provide training to appropriate staff. Provide documentation of the above to DOE.			
Student Demographic Information		School	LEA Verification of Correction		DE DOE Verification of Correction			
Student Date of Birth	First Name	Last Name	Attendance Center	Corrective Action Code	Signature of LEA Validator	Date of Correction	Signature of DE DOE Validator	Date of Verification

Campus Community School

Special Education Corrective Action Plan

2014 – 2015

Goal: The goal of this plan is to ensure systemic changes in the Campus Community School that will improve transition services and post school outcomes for students with disabilities and their families, and achieve and maintain the Local Education Agency's (LEA's) compliance with Indicator 13 (transition) regulations.

Background: During the 2014-2015 school year, LEAs conducted self-assessments on transition by reviewing student records and IEPs for compliance with special education transition regulations. Department of Education ("DOE") representatives then validated the self-assessment data submitted from LEAs by reviewing a random sample of student records and IEPs provided to LEAs. DOE provided a compliance monitoring report to the LEA summarizing the findings. This corrective action plan describes the strategies and steps that the LEA will take to ensure compliance with special education transition regulations, including professional development and a system of internal controls.

Due Dates: This plan must be submitted by **August 28, 2015**. Additionally, the LEA must complete individual student corrective action and by **September 30, 2015** and professional development for staff in the areas identified in the monitoring report by **October 30, 2015**.

On Behalf of Campus Community School
Submitted by:

School Leader

On Behalf of the Department of Education
Reviewed and Approved by:

Director of Exceptional Children Resources

Final Approval Date: _____

Core Monitoring Question	Primary "Root Cause" of Noncompliance	Corrective Actions
<p>STR 1: For students of transition age:</p> <p>With the consent of the parent or Student (who has reached the age of majority), invitation of meeting was provided to a participating agency likely to be responsible or paying for transition services</p> <p>NOTE: Review file for invitation AND consent</p>		
<p>STR 2: For students of transition age:</p> <p>Student was invited to the IEP meeting</p>		
<p>STR 4a: For students of transition age:</p> <p>Age appropriate transition assessments were conducted annually related to:</p> <ul style="list-style-type: none"> • Education/Training 		

Core Monitoring Question	Primary "Root Cause" of Noncompliance	Corrective Actions
<p>STR 4b: For students of transition age:</p> <p>Age appropriate transition assessments were conducted annually related to:</p> <ul style="list-style-type: none"> • Employment 		
<p>STR 4c: For students of transition age:</p> <p>Age appropriate transition assessments were conducted annually related to:</p> <ul style="list-style-type: none"> • Independent living skills 		
<p>STR 5: For students of transition age:</p> <p>IEP contains an appropriate measurable postsecondary goal based upon age appropriate transition assessments related to employment after high school</p>		

Core Monitoring Question	Primary "Root Cause" of Noncompliance	Corrective Actions
<p>STR 6: For students of transition age:</p> <p>IEP contains an appropriate measurable postsecondary goal based upon age appropriate transition assessments related to education OR training after high school</p>		
<p>STR 7: For students of transition age:</p> <p>IEP contains an appropriate measurable postsecondary goal based upon age appropriate transition assessments related to independent living after high school</p>		
<p>STR 8: For students of transition age:</p> <p>IEP contains courses of study to assist Student in reaching postsecondary goals</p>		
<p>STR 9a: For students of transition age:</p> <p>IEP contains transition activities and services to assist Student in reaching their</p>		

Core Monitoring Question	Primary "Root Cause" of Noncompliance	Corrective Actions
postsecondary employment goals		
STR 9b: For students of transition age: IEP contains transition activities and services to assist Student in reaching their postsecondary education/training goals		
STR 9c: For students of transition age: IEP contains transition activities and services to assist Student in reaching their postsecondary independent living goals		

Signatures of all LEA School staff who participated in the development of the LEA's Corrective Action Plan:

Name:

Signature:

Title:
