



**U.S. DEPARTMENT OF EDUCATION
OFFICE OF SPECIAL EDUCATION PROGRAMS**

**IDEA PART B FEDERAL FISCAL YEAR (FFY) 2014
CORRECTIVE ACTION PLAN
PROGRESS REPORT #1**

~~SUBMITTED: NOVEMBER 3, 2014~~

REVISED SUBMISSION: NOVEMBER 26, 2014

I. LEA Compliance with Secondary Transition Requirements

In FFY 2014, OSSE continues to implement a number of key strategies designed to improve LEA compliance with secondary transition requirements. First, OSSE is continuing its monitoring of secondary transition requirements as required via the Memorandum of Agreement (MOA) established by OSSE and the Office of Special Education Programs (OSEP) in December 2009. OSSE's review of a sample of 100 IEPs for required secondary transition content will be followed by LEA notification of the findings of each review via reports issued using the District of Columbia Corrective Action Tracking System (DC CATS). These reports provide written notification to LEAs to correct identified noncompliance as soon as possible and in no case later than one year from identification. OSSE will also continue to provide ongoing technical assistance to LEAs as they receive findings issued through DC CATS.

OSSE continues to maintain a dedicated State secondary transition webpage for the District. This webpage, which is designed with input from OSSE's State Secondary Transition Community of Practice (CoP), has key secondary transition information and tools for all education stakeholders, including parents and students. This resource will be further enhanced by the District's new secondary transition public awareness campaign, "Get Started Now!", which was formally launched in October, 2014.

In FFY 2014, OSSE will continue its efforts to ensure systemic reform via comprehensive LEA training and technical assistance. The Division of Elementary, Secondary, and Specialized Education's Monitoring and Compliance Team, Teaching and Learning Team, and Special Education Data Team continue to support the SEA in developing and implementing a robust targeted technical assistance strategy informed by data.

OSSE's focused monitoring related to secondary transition resulted in an eight-month technical assistance plan for the schools most in need of support in meeting secondary transition requirements. The pilot project continued into FFY 2014 and will end in November of 2014. Based upon early indicators of success, OSSE plans to expand this effort in FFY 2014, with a goal of conducting focused monitoring in DCPS and 5 Charter LEAs.

Last, OSSE continues to execute plans to update the State's Special Education Data System (SEDS) in ways that will support increased compliance with secondary transition in areas where the data shows that LEAs are demonstrating the highest rates of noncompliance.

Progress related to OSSE's action plan to accelerate improvement related to compliance with secondary transition requirements (IDEA section 614 (d)(1)(A)(i)(VIII) and 34 CFR §§300.320(b) and 300.321(b)) is outlined below.

Table 1. OSEP Part B Corrective Action Plan Element 1: Determination Letter Page 6, Section A, Item (1)

Required Actions:

- 1) Provide a plan that ensures that the State demonstrates compliance with the requirement that IEPs for youth aged 16 and above include required secondary transition content; the student is invited to the IEP Team meeting where transition services are discussed; and if appropriate, a representative of any participating agency is invited to the IEP Team meeting with the prior consent of the parent or student who has reached the age of majority (IDEA section 614 (d)(1)(A)(i)(VIII) and 34 CFR §§300.320(b) and 300.321(b)).

Item Number	Strategies/Action Items	Timeline	Who is Responsible?	Status	Evidence of Completion
1	Conduct secondary transition review for special conditions report #1	October, 2014	Jennifer Masoodi Director, QAM	On Track Completed	Completed Records Review Tools
2	Issue secondary transition findings of noncompliance identified during special conditions review #1	January, 2015	Jennifer Masoodi Director, QAM	On Track	LEA Letters of Finding
3	Conduct secondary transition review for special conditions report #3	April, 2015	Jennifer Masoodi Director, QAM	On Track	Completed Records Review Tools
4	Issue secondary transition findings of noncompliance identified during review #3	June, 2015	Jennifer Masoodi Director, QAM	On Track	LEA Letters of Finding

Item Number	Strategies/Action Items	Timeline	Who is Responsible?	Status	Evidence of Completion
5	Continue to coordinate a State-wide Secondary Transition Community of Practice (CoP) that will continue to support the implementation of the DC State Secondary Transition reform plan	Ongoing, Meets Monthly	Nate Dearden Education Program Specialist, TTA	On Track	Secondary Transition State Plan, Meeting Agendas, Handouts
6	Update SEDS and disaggregate secondary transition compliance data on a quarterly basis to identify "priority" LEAs and schools for focused monitoring and technical assistance	October, 2014; Ongoing	Jennifer Masoodi Director, QAM Karmen Rouland, Director, Special Education Data La' Shawndra Scroggins, Director, TTA	On Track	Training Materials, Agendas
7	Implement focused monitoring on secondary transition in 6 LEAs	Fall and spring, 2014	Jennifer Masoodi Director, QAM La' Shawndra Scroggins, Director, TTA	On Track	Monitoring Tools
8	Implement comprehensive training model based on data	October, 2014; Ongoing	La' Shawndra Scroggins Director, TTA	On Track	Training Materials, Agendas

Item Number	Strategies/Action Items	Timeline	Who is Responsible?	Status	Evidence of Completion
9	Continue implementation of "CIRCLES" Project	November, 2014; Ongoing	Nate Dearden Education Program Specialist, TTA	On Track	Training Materials, Agendas, Evaluation Report
10	Expand public awareness campaign related to secondary transition	September, 2014; Ongoing	Desiree Brown Special Projects Manager, Parent and Community La'Shawndra Scroggins Director, TTA Nate Dearden Education Program Specialist, TTA	On Track	Website Campaign Materials

II. Implementation of a System of General Supervision Designed to Effectively Correct Noncompliance

In FFY 2014, OSSE continues to ensure that it uses all components of its general supervision system to timely identify and notify LEAs of identified noncompliance and the LEA's responsibility to ensure that all noncompliance is corrected as soon as possible and in no case later than one year after the date of OSSE's identification of the noncompliance.

OSSE continues to implement a robust compliance monitoring system and incorporate off-site record reviews and database monitoring into its general supervision system. OSSE is utilizing an internal accountability system that ensures that each LEA monitor tracks the timely closure of each finding of noncompliance for each of his or her LEAs. Monitors undertake a monthly review of the closure of noncompliance at each of their LEAs, and will use data from the DC CATS system to identify compliance items or corrective actions that are more difficult for LEAs to close in a timely fashion. This allows monitors to provide targeted support to LEAs in the areas of greatest need. Additionally, OSSE continues to use DC CATS to allow the SEA to accurately examine and track noncompliance identified in all areas, and to ensure that LEAs are timely notified of all noncompliance and to enable OSSE to more thoroughly analyze timelines, trends and areas to target for technical assistance.

OSSE's updated monitoring manual, training design and monitoring reports continue to emphasize the LEA's responsibility to ensure that all noncompliance is corrected as soon as possible and in no case later than one year after the date of the State's identification of the noncompliance (i.e., written notification to the LEA of the noncompliance). The updated manual and training also outlined the process for correction of noncompliance in accordance with OSEP Memorandum 09-02. OSSE continues to ensure that LEAs are made aware of their obligations and are supported in meeting them by offering an annual refresher training in the fall and subsequent regular opportunities for training and technical assistance throughout the school year. In the fall of 2014, OSSE monitors offered additional technical assistance on the requirements of OSEP Memorandum 09-02 and the components of on-site visits and quarterly database monitoring to LEA representatives either one-on-one or in small groups.

OSSE continues to develop its focused monitoring activities to assist LEAs with identifying root causes of systemic noncompliance and providing targeted technical assistance to improve practice. In FFY 2013, OSSE piloted focused monitoring in the area of secondary transition, and as noted in the previous section, OSSE continues to expand this work in FFY 2014 based on the positive results noted in participating pilot schools.

Progress related to OSSE's detailed action plan to ensure that its general supervision system continues to be reasonably designed to effectively correct noncompliance in a timely manner (IDEA sections 612(a)(11) and 616, 34 CFR §§300.149 and 300.600(e), 20 U.S.C. 1232d(b)(3), and OSEP Memo 09-02) is outlined in the following table.

Table 2. OSEP Part B Corrective Action Plan Element 2: Determination Letter Page 6, Section A, Item (2)

Required Actions:

- 1) Provide a plan that ensures that the State demonstrates that it has a general supervision system that is reasonably designed to effectively correct noncompliance in a timely manner (IDEA sections 612(a)(11) and 616, 34 CFR §§300.149 and 300.600(e), 20 U.S.C. 1232d(b)(3), and OSEP Memo 09-02).

Item Number	Strategies/Action Items	Timeline	Who Is Responsible?	Status	Evidence of Completion
11	Continue to implement current system of monitoring to ensure that OSSE communicates to LEAs the obligation to ensure that all such noncompliance is corrected as soon as possible and in no case later than one year after the date of the State’s identification of the noncompliance (i.e., written notification to the LEA of the noncompliance)	Ongoing	Jennifer Masoodi Director, QAM	On Track	Monitoring Manual, Annual Training Agendas, Monitoring Reports
12	Implement ongoing staff training to ensure inter-rater reliability and common understanding of proper methods to verify correction of noncompliance	Ongoing	Jennifer Masoodi Director, QAM	On Track	Agendas, Handouts

Item Number	Strategies/Action Items	Timeline	Who Is Responsible?	Status	Evidence of Completion
13	Implement internal accountability system to ensure monitors track closure of noncompliance at each LEA and use data to determine areas for which TA and/or support are needed by each LEA	Ongoing	Jennifer Masoodi Director, QAM	On Track	Agendas, Handouts
14	Provide LEA training related to verification of LEA correction of noncompliance, including the review of updated data in accordance with Memo 09-02	September, 2014	Jennifer Masoodi Director, QAM	On Track Completed	Agendas, Handouts
15	Continue to provide individualized training and technical assistance to LEAs via designated QAM LEA contacts based on data reviews and LEA requests	Ongoing	Jennifer Masoodi Director, QAM	On Track	Telephone and Email Logs
16	Implement a results- focused monitoring process for secondary transition	November, 2014	Jennifer Masoodi Director, QAM	On Track	Monitoring Tools

III. Compliance with the Requirement to Conduct Timely Initial Evaluations and Reevaluations

In FFY 2014, OSSE continues its efforts to ensure that LEAs comply with requirements to conduct timely initial evaluations and reevaluations.

OSSE continues to make available LEA Planning and Performance Reports, which include initial evaluation and reevaluation metrics, through its recently launched Reports Framework. These reports are designed to assist LEAs in monitoring their own progress and identifying and resolving the root causes of delays. OSSE has been further refining these reports over the reporting period and vetting them with LEA users to ensure relevance related to problem solving and continuous improvement.

In addition, OSSE continues to expand upon an LEA support team model through which a cross-functional team will review initial evaluation and reevaluation data on a quarterly basis, provide technical assistance to identified LEAs with chronic noncompliance, and provide access to a consortium of specialized related service providers to assist LEAs whose reason for delay is lack of provider availability.

OSSE also continues to ensure that LEA leaders and staff are provided regular training and technical assistance opportunities to support improved practice. These opportunities include monthly webinars for LEA special education points of contact, a comprehensive training curriculum provided by the Division's Training and Technical Assistance Unit, dedicated support from QAM LEA contacts, and support provided via the Division's Policy Unit.

Progress related to OSSE's detailed action plan to accelerate improvement related to initial evaluations and reevaluations and ensure compliance with specific regulatory requirements (IDEA sections 612(a)(7) and 614(a) through (c) and 34 CFR §§300.301(c)(1) and 300.303) is outlined below.

Table 3. OSEP Part B Corrective Action Plan Element 4: Determination Letter Page 6, Section A, Item (4)

Required Actions:

- 1) Provide a plan that ensures that the State demonstrates LEA compliance with the requirement to conduct timely initial evaluations and reevaluations (IDEA sections 612(a)(7) and 614(a) through (c) and 34 CFR §§300.301(c)(1) and 300.303).

Item Number	Strategies/Action Items	Timeline	Who Is Responsible?	Status	Evidence of Completion
17	Conduct LEA technical assistance sessions to review obligations and improve compliance with evaluation, reevaluation, and IEP development	August, 2014; Ongoing Monthly	Karmen Rouland, Director, Special Education Data La' Shawndra Scroggins, Director, TTA	On Track	Meeting Materials
18	Make available LEA Planning and Performance Reports to assist LEAs with accessing their data related to evaluations and reevaluations and to enhance overall management of special education processes	Ongoing	Karmen Rouland, Director, Special Education Data	On Track	Sample Planning and Performance Reports
19	Utilize cross-functional teams to regularly review initial evaluation and reevaluation compliance data to drive tiered technical assistance	September, 2014; Ongoing, Quarterly	Amy Maisterra Asst. Superintendent	On Track	Agendas Training Materials

IV. Directed Use of FFY 2014 State-level Funds to Address Longstanding Noncompliance with Timely Initial Evaluation and Reevaluation Requirements and Secondary Transition Requirements

Pursuant to the enforcement actions placed on the District of Columbia’s FFY 2014 IDEA, Part B section 611 grant award, OSEP required that \$125,000 of the total grant award be used to further reduce the backlog of ~~initial evaluations and~~ reevaluations and increase progress toward ensuring timely ~~initial evaluations and~~ reevaluations. OSEP has also required that \$250,000 of the total grant award be used to address noncompliance with secondary transition requirements.

OSSE received approval to use \$250,000 of its state level funds to support key high leverage activities at the State level that it believes will accelerate progress in the area of secondary transition and \$125,000 of its State-level funds to support activities related to improvement in compliance with ~~initial evaluations and~~ reevaluation timelines.

Listed below is OSSE’s FFY 2014 revised spending plan, which details how the FFY 2014 State-level funds will be used by July 1, 2015, and their intended impact:

Activities and Anticipated Impact of Activities on Longstanding Noncompliance (Reevaluation Backlog and Secondary Transition)	Estimated Cost	Projected Timeline to Expend Funds	Expenditure Documentation Description
Develop a consortium of special education service providers to assist LEAs identified as needing targeted or intensive technical assistance with 1) systemic improvement planning to prevent overdue events and 2) the completion of overdue reevaluations.	\$125,000	October, 2014 - July, 2015	Requisition for Procurement of Contracted Services; Approved Invoices
Update the Special Education Data System to facilitate compliance with secondary transition requirements.	\$50,000	October, 2014 - July, 2015	Requisition for Procurement of Contracted Services; Approved Invoices
Ensure implementation of the State secondary transition compliance plan in partnership with the Secondary Transition CoP. This facilitation will include an annual secondary transition institute, a	\$20,000	October, 2014 - July, 2015	Requisition for Procurement of Contracted Services; Approved Invoices

mid-year forum to monitor progress, support of outreach events, continued implementation of the CIRCLES model, and a regular review with the CoP of secondary transition compliance data to inform planning and hold partner agencies, including OSSE, RSA, and ODR, accountable for improved outcomes.			
Provide funding for events and materials for expansion of a city-wide public awareness campaign related to secondary transition, "Get Started Now!", including written materials and website updates.	\$30,000	November, 2013-July, 2014 November, 2014- July, 2015	Requisition for Procurement of Contracted Services; Approved Invoices
Support the salary of an FTE in the Training and Technical Assistance Unit to ensure focused support of OSSE's secondary transition activities, including coordination with the Monitoring and Compliance Unit and implementation of the SEA's "Get Started Now!" public awareness campaign in FFY 2014.	\$75,000	July, 2014- July, 2015	Employee Reimbursement Workbook
Support the salary of an FTE in the Monitoring and Compliance Unit to oversee expansion of the SEA's secondary transition focused monitoring activities in FFY 2014.	\$75,000	July, 2014- July, 2015	Employee Reimbursement Workbook

For evidence of the rate at which OSSE has expended its DUF for FFY 2013 funds between July 1, 2014- September 30, 2014, see Attachment A. For evidence of the goods and services OSSE purchased with its IDEA 2013 DUF during the reporting period, please see Attachments B-E H. As noted in OSSE's Special Conditions Report, to help facilitate a reduction in the evaluation and reevaluation backlog, OSSE has enhanced the LEA Performance and Planning report to show compliance trends for LEAs. In this report, we have also included a detailed listing of the student records with compliance and/or potential enrollment issues that contribute to their non-compliant status. OSSE will be using this report revision to guide enhanced technical assistance activities which will utilize remaining unexpended FFY 2013 funds by September 30, 2015.

OSSE's expenditures for FFY 2014 IDEA DUF will be captured using Attachment F. OSSE has not yet expended FFY 2014 funds due to fact that this grant funding had not yet been made available during the reporting period.

Progress related to OSSE's plan that directs the use of funds under IDEA section 611(e) to address longstanding noncompliance with the requirements to ensure timely ~~initial evaluations and~~ reevaluations and secondary transition requirements is outlined below.

Table 6. OSEP Part B Corrective Action Plan Element 6: Determination Letter, Page 6, Section B

Required Actions:

- 1) Provide a plan that directs the use of funds under IDEA section 611(e) to address longstanding noncompliance with the requirements to ensure timely ~~initial evaluations and~~ reevaluations and secondary transition requirements.

Item Number	Strategies/Action Items	Timeline	Who Is Responsible?	Status	Evidence of Completion
20	Develop a consortium of special education service providers to assist LEAs identified as needing targeted or intensive technical assistance with 1) systemic improvement planning to prevent overdue events and 2) the completion of overdue initial evaluations/ reevaluations	October, 2014	La' Shawndra Scroggins, Director, TTA	On Track	Contracts, Invoices, Evaluation and Reevaluation Data
21	Update the Special Education Data System to facilitate compliance with secondary transition requirements	October, 2014	Karmen Rouland, Director, Special Education Data	On Track	Invoices, system blueprints
22	Ensure facilitation of the secondary transition COP and implementation of the State secondary transition plan	October, 2014	La' Shawndra Scroggins, Director, TTA Nate Dearden, Education Program Specialist, TTA	On Track	Meeting agendas, sign in sheets

Item Number	Strategies/Action Items	Timeline	Who Is Responsible?	Status	Evidence of Completion
23	Host key events around the city and provide materials to support expansion of a city-wide public awareness campaign related to secondary transition, "Get Started Now!"	September, October, 2014; Ongoing	Desiree Brown, Manager, Parent and Community Relations Nate Dearden, Education Program Specialist, TTA	On Track	Agendas, sign-ins Orders for Secondary Transition Toolkits