Residential Facility (RF) Monitoring System 2006-2007

Corrective Action Plan

| LEA Name: Denton Independent School District | Date Submitted: 8/13/07, 8/31/07, 9/10/07 CAP Developed by TEA: 9/25/07; revised 10/11/07 |
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| County/District #: 061-901 | ESC Region: XI |

The Texas Education Agency (TEA) has the responsibility to verify that, within one year of identification of noncompliance in the RF Monitoring System, a local education agency (LEA) has implemented corrective actions (CAs) necessary to achieve compliance with state and federal mandates. The LEA is responsible for the submission of a *Corrective Action Plan* (CAP) to the TEA by the due date established in the RF monitoring report. The CAP must be implemented by the LEA to correct identified areas of noncompliance as soon as possible, but no later than one year from identification. Failure to submit the CAP or to implement corrective actions as required will result in further enforcement proceedings and sanctions.

| Identified Noncompliance: (Enter the investigatory topic and specific legal reference from the CFR, TEC, or TAC) | Desired Result (Goal(s) that address each identified area of student-specific or systemic noncompliance) | Measurable Evidence of Correction (Qualitative and/or quantitative measures of correction) | Corrective Action Activities (Initiatives planned to achieve correction) | Resources (Materials/supplies, fiscal, and personnel needed to implement activities) | Timeline for Implementation (Enter the initial, interim, and final timelines that have been established for evaluation purposes) |
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| General Compliance Correction 34 CFR §300.321 (a) (2) 34 CFR §300.321 (b) (2 34 CFR §300.519 19 TAC §89.1047 19 TAC §89.1047 19 TAC §89.1040(b) 34 CFR §300.305(a)(1) 34 CFR §300.17(d) 34 CFR §300.105(a) 34 CFR §300.105(a) 34 CFR §300.323(c)(2) 34 CFR §300.324(b)(1)(i) 34 CFR §300.317 34 CFR §300.117 34 CFR §300.156(a) 19 TAC §89.1055(g) 34 CFR §300.106(a)(1) 19 TAC §89.1065(1), (2) 34 CFR §300.321 (b)(3) 34 CFR §300.17 34 CFR §300.101 (a) | LEA will become compliant in areas identified during the April 2007 Residential Facility (RF) Monitoring visit. | Correction of all areas of noncompliance identified during the TEA RF Monitoring of RF student programs in April 2007. | (1) Review/revise LEA Special Education Operating Guidelines in the following areas of non-compliance: Regular education teacher at Admission, Review, and Dismissal (ARD) Committee meeting Student participation in transition planning Appropriate assignment of surrogate parents Determination of eligibility Comprehensive evaluation Implementation of IEP as written Provision of assistive technology devices and services Documentation of annual IEP goals and objectives Access to nonacademic and extracurricular activities Certified/qualified staff | Director of Special Education Supervisory Special Education Staff Operating Guidelines | October 2007 |

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| Decisions regarding length | | |
| of school day • Documentation of related | | |
| services | | |
| Individualized decision | | |
| making: transition | | |
| Documentation of extended | | |
| school year (ESY) services | | |
| Use of documentation for | | |
| ESY services | | |
| Appropriate selection of | | |
| statewide assessment | | |
| Transition services; | | |
| participants at ARD | | |
| committee meetings • Individualized decision | | |
| Individualized decision making: instructional | | |
| services | | |
| Content of IEP | | |
| Free Appropriate Public | | |
| Education (FAPE) | | |
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| (2) Special Education | Special Education | October 2007 |
| Supervisors will be designated specific responsibilities of | Director | |
| monitoring programs, | Supervisory Special | |
| individual education programs | Education Staff | |
| (IEPs), and admission, review, | | |
| dismissal (ARD) | | |
| documentation for RF | | |
| students. | | |
| Responsibilities will include but | | |
| will not be limited to: | | |
| Development of a district | | |
| monitoring document | Special Education | October 2007 |
| designed to assure that all | Director Supervisory Special | |
| aspects of compliance are | Education Staff | |
| fulfilled | Luucation Stan | |
| | | |
| Training for case mangers | Special Education | October 2007 |
| (diagnosticians and speech | Director | |
| therapists) on the district's | Supervisory Special | |
| monitoring document (training will address legal | Education Staff | |
| authority, operating | | |
| authority, operating | | |

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| | | | guidelines, procedure, etc.) | | |
| | | | Assisting case managers with the parent contact or determining the need for surrogates | Supervisory Special Education Staff | September 2007 and ongoing |
| | | | Participating in ARD committee meetings for RF students | Supervisory Special Education Staff | September 2007 and ongoing |
| | | | Monitoring RF students in their instructional setting | Supervisory Special Education Staff | September 2007 and ongoing |
| | | | Facilitating/implementing training activities associated with each area of noncompliance | Director of Special Education Supervisory Special Education Staff ESC Region 11 Staff | October 2007 |
| | | | Monitoring of eligibility files each six week period to verify compliance using district developed monitoring document | Director of Special Education Supervisory Special Education Staff | October 2007 and ongoing |
| | | | Documentation of all monitoring and notification to director of any noncompliance/concerns | Director of Special Education Supervisory Special Education Staff | October 2007 and ongoing |
| Properly Constituted Admission, Review, and Dismissal (ARD) Committee Parent Attendance 34 CFR §300.321(a)(1) Regular Education Attendance 34 CFR §300.321(a)(2) Student Participation in Transition Planning 34 CFR §300.321.(b) | Appropriate ARD membership shall be established for each ARD committee. | 100% of RF students files will demonstrate appropriate required ARD committee members. | Training for campus administrators, teachers, and case managers regarding: • Revised operating guidelines; • Required ARD committee participants and their role; and • Legally defensible properly constituted ARD committee meetings. | Director of Special Education Supervisory Staff | September 2007 |

| | | | Develop checklist of ARD required participants. | Director of Special Education Supervisory Staff | October 2007 |
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| | | | Campus administrators will utilize the ARD agenda/ checklist prior to the initiation of the ARD committee meeting to determine that all required members are present. | Campus Administrator ARD agenda/checklist | October 2007 and ongoing |
| | | | Review of RF student files to identify which students did not have a properly constituted ARD committee during 2006-2007 school year. | Campus staff Case Manager | October 2007 |
| | | | Convene ARD committee meetings for RF students identified as not having a properly constituted ARD committee meeting during 2006-2007 school year. | ARD committees | November/December 2007 |
| | | | Conduct monitoring each six weeks of 20% of RF students' eligibility folders to verify that ARD committee meetings are properly constituted. | Director of Special Education Supervisory Staff | October 2007 and ongoing |
| Surrogate Parents and Foster Parents 34 CFR §300.519 19 TAC §89.1047 | Establish a system for appropriate assignment of surrogate parents. | 100% of RF students with disabilities who require a surrogate parent will have an appropriate individual assigned. | Develop a system to analyze and document the need for the assignment of a surrogate parent to RF students. | Director of Special Education Supervisory Staff | September 2007 |
| | | | Train case managers on revised operating guidelines concerning surrogate parents and the system to analyze and document the need for the assignment of a surrogate | Director of Special Education Supervisory Staff | October 2007 |

| surrogate parents. | Director of Special Education Supervisory Staff Campus staff Diagnosticians Speech Therapists | October 2007 |
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| agreement form between the | Director of Special Education Supervisory Staff | October 2007 |
| parents to use to document | Director of Special Education Supervisory Staff | October 2007 |
| required responsibilities and | Director of Special Education Supervisory Staff | November 2007 |
| | Case managers Campus staff | October/November 2007 |

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| | | | Meet with members of each RF staff to review the requirements for assignment of surrogate parents. | Director of Special Education Supervisory Staff | November 2007 |
| | | | Conduct monitoring each six weeks of 20% of RF students to verify appropriate assignment of surrogate parents. | Director of Special Education Supervisory Staff | October 2007 and ongoing |
| | | | Conduct monitoring each six weeks of surrogate parent documentation log. | Director of Special Education Supervisory Staff | October 2007 and ongoing |
| Current Evaluation 34 CFR §300.305(a)(1) 19 TAC §89.1040(b) | Full and individual evaluation (FIE) will be current and contain all required components. | All RF students will have current FIEs that contain all required components. | Training for evaluation personnel (diagnosticians, speech therapists, licensed specialist in school psychology, occupational therapists, etc.) will be conducted on the following items: • Revised operating guidelines concerning evaluations; • Review of eligibility categories and required components of each; • Requirements of FIEs; and • Importance of checking student records for complete evaluation and eligibility reports and appropriate signatures. A review of RF student records | Director of Special Education Supervisory Staff | November/December |
| | | | will be conducted for complete evaluations. If evaluations are | personnel | 2007 |

| | | | not complete, new evaluations will be conducted. Conduct monitoring each six weeks of 20% of RF students for complete FIEs. | Director of Special Education Supervisory Staff | November 2007 and ongoing |
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| Individualized Education Program (IEP) 34 CFR §300.17(d) | RF students will receive services as indicated in their IEPs. | All RF students' ARD schedule of services will be verified against campus schedules and service providers documentation logs. | Training for campus administrators, special education personnel and evaluation personnel will be conducted addressing: • Revised operating guidelines • Alignment of student scheduling with IEPs • Overview of procedures to assure students receive services as stated in IEP • Interactive file reviews by training participants • Post training Q&A regarding procedures and expectations | Director of Special Education Supervisory Staff Campus administrators | October 2007 |
| | | | Conduct a review of services that RF students are receiving to determine if all services are being provided as indicated in IEP. Make changes to students' current schedules, if needed. | Campus staff Case managers | October/November 2007 |
| | | | Convene ARD committee meetings for any students who did not receive services as indicated in their IEPs to consider if compensatory services are warranted. | ARD committees | October/November |
| | | | Conduct monitoring each six weeks for 20% of RF students to verify schedule of services match what the students are actually receiving. | Director of Special Education Supervisory Staff | October 2007 and ongoing |

| Provision of Assistive Technology (AT) Devices and Services 34 CFR §300.105(a) | Assistive technology services will be provided according to IEPs. | All RF students will be provided their AT services as required by IEPs. | Designate staff to provide direct instruction, consultative and technical assistance in the area of AT. | Director of Special Education | September/October 2007 |
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| 34 CFT §300.323(c)(2) | | | Designate clerical staff to assist the AT staff. | Director of Special Education | September/October 2007 |
| | | | Develop a database of all students who should be receiving AT services. | AT specialist and clerical staff | September/October 2007 |
| | | | Develop a system for documenting the provision of AT services. | Supervisory staff AT specialist Clerical staff | September/October 2007 |
| | | | Deliver AT equipment to campuses for RF students. | AT specialist | September/October 2007 |
| | | | Train special education teachers and related service providers on: • Revised operating guidelines concerning AT services; • Roles and responsibilities of AT staff; • Use of AT devices; • How services will be delivered; and • Documenting receipt of devices and services. | AT specialist Supervisory staff Special education teachers Related service providers District AT guidelines Substitutes for teachers | October/November 2007 |
| | | | A review of RF students records will be conducted to identify which students should be receiving AT services. For students not receiving services which are indicated in their IEP, conduct ARD committee to discuss compensatory services. | Campus staff Case managers | October 2007 |

| | | | Conduct monitoring each six weeks of 20% of RF students to verify that AT services a re provided as indicated in the students' IEPs. | Director of Special Education Supervisory Staff | October 2007 and ongoing |
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| Documentation of IEP Goals Objectives 34 CFR §300.324(b)(1)(i) | IEPs will be reviewed annually. | All RF students will have IEPs reviewed annually as documented by ARD documentation. | Develop a system to track RF students' annual ARD dates. | Director of Special Education Supervisory Staff | October 2007 |
| | | | Conduct training with case managers and campus administrators to address: | Director of Special Education Supervisory Staff Case managers Campus administrators Sample PEIMS reports Sample SEM reports Database | October 2007 |
| | | | Conduct training on organizational skills for case managers. | Diagnostician as trainer Diagnosticians Speech Therapists | November 2007 |
| | | | Conduct monitoring each six weeks of 20% RF students to verify that annual ARDs are being conducted within timelines. | Director of Special Education Supervisory Staff | October 2007 and ongoing |
| Least Restrictive Environment (LRE) 34 CFR §300.116(d) 34 CFR §300.117 34 CFR §300.320(a)(5) | Students will be placed in the least restrictive environment and will have access to nonacademic and extracurricular services. | All RF students will be placed in the LRE and have access to all nonacademic/extracurricular activities as designated by ARD committees. | Conduct training with LEA special education and general education personnel and campus administrators addressing: • Revised operating guidelines concerning LRE; • Required analysis of all LRE considerations for students, including: | Director of Special Education Supervisory Staff | October 2007 |

| o Provision of |
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| supplementary |
| aids and services |
| in general |
| education classes |
| prior to a student's |
| removal to a more |
| restrictive setting; |
| o Modifications or |
| |
| supports for school |
| personnel that will |
| be provided in the |
| general education |
| classroom; |
| ○ How the student |
| will be involved |
| and progress in the |
| general education |
| curriculum; |
| o Decisions |
| concerning student |
| participation in |
| extracurricular and |
| |
| or nonacademic |
| activities; |
| o Any potential |
| harmful effect on |
| the student or on |
| the quality of |
| services that he or |
| she needs; and |
| o individual student |
| justification as to |
| why educational |
| and related |
| services cannot be |
| provided in the |
| LRE. |
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| Alignment of ARD |
| requirements |
| concerning LRE with |
| what student is |
| actually receiving |
| daily and weekly. |
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| | | | A review of all RF students' records will be conducted to determine whether students are receiving nonacademic and extracurricular activities as stated in their IEPs. | Campus staff Case managers | October 2007 |
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| | | | Convene ARD committees for students who have not had access to nonacademic and extracurricular activities to consider compensatory services. | ARD committees | October/November 2007 |
| | | | Conduct monitoring each six weeks of 20% of RF students' eligibility folders to verify all LRE requirements are being considered and that RF students are receiving all nonacademic/extracurricular activities required by ARD. | Director of Special Education Supervisory Staff | October 2007 and ongoing |
| Certified /Qualified Staff 34 CFR §300.156(a) | RF students will receive services from staff that is certified and qualified. | All LEA personnel who provide services to RF students will be certified and highly qualified in the area(s) of assignment. | Review certification of all LEA personnel providing services to RF students with disabilities. Employ personnel that is appropriately certified and qualified to serve RF students with disabilities. | Deputy Superintendent Human Resources Department Campus administrators Director of Special Education | August 2007 and ongoing |
| | | | Review educational records for all RF students to determine if students were served by certified/qualified staff. | Campus staff Case managers | October/November 2007 |
| | | | Convene ARD committee meetings for RF students who were provided educational services by uncertified/ unqualified staff to consider if students received a free | ARD committees | October/November 2007 |

| | | | appropriate public education (FAPE), and if not, whether compensatory services are warranted. | | |
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| Commensurate School Day 19 TAC §89.1075(d) | Commensurate school day requirements will be met for all RF students. | All RF students will have a commensurate school day or appropriate individual justification for a shortened day. | Conduct meeting between LEA administrators and RF staffs to discuss the Memorandum of Understanding and the implementation of a commensurate school day. | Deputy Superintendent RF administrations LEA administration Director of Special Education | October 2007 |
| | | | Conduct training for administrators, general education teachers, special education teachers to address revised operating guidelines and appropriate decisionmaking and documentation regarding provision of a commensurate school day. | Director of Special Education Supervisory Staff | October/November 2007 |
| | | | Review records for RF students who are not receiving a commensurate day to determine if individual justification has been provided, and is appropriate for the student. | Campus staff Case managers | October/November 2007 |
| | | | Convene ARD committee meetings for RF students not receiving a commensurate day and for whom an individual justification for a shortened day is not provided or is not appropriate. For students who have an appropriate individual justification, review the ARD documentation for a timeline and plan for returning the student to a commensurate school day. | ARD committees | November/December 2007 |
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| | | | Conduct monitoring each six weeks of 20% of RF students to verify that RF students are receiving a commensurate school day and if not, if the justification is still valid. | Director of Special Education Supervisory Staff | October 2007 and ongoing |
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| Related Services Provision 34 CFR §300.320(a)(2), (4), (7) | IEP goals and objectives will be identified for all related services. | All related services will have specified goals and objectives for direct and consultative services. | Review and revise processes for determining related service goals and objectives and the IEP process for designating the goals and objectives. | Director of Special Education Supervisory Staff Related Services Supervisors | September/October 2007 |
| | | | Conduct training for teachers and related service providers to address: • Revised operating guidelines concerning related services; • Process for designating specific IEP goals and objectives for a direct related service; and • Procedures for documenting a consultative related service. | Related Services Supervisors Teachers Related services Providers | October 2007 |
| | | | Review records for all RF students to determine that goals and objectives are specified for all related services. | Campus staff Case managers | October/November 2007 |
| | | | Convene ARD committee meetings for students who need goals and objectives for a related service. | ARD committees | October/November 2007 |
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| | | | Conduct monitoring each six weeks of 20% of RF students receiving related services to verify IEPs contain documentation of specific IEP goals/objectives for related services and of documentation that the related service was provided. | Director of Special Education Supervisory Staff Related Services Supervisors | October 2007 and ongoing |
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| Transition Services 34 CFR §300.320(b) | Transition services are address in annual IEPs for all students who are 14 years or older. | All RF students will have transition services addressed annually in IEP, according to federal and state requirements. | Conduct training for case managers addressing revised operating guidelines concerning transition services. | Transition specialist Case managers | October 2007 |
| Participation at ARD Committee Meetings 34 CFR §300.321(b)(3) | Post-secondary adult service providers will be invited to annual ARD meetings, as appropriate. | Adult service agencies will be invited to all annual ARD meetings for all RF student when addressing transition services, as appropriate. | Review records for all RF students to determine that transition services have been addressed in annual IEPs for RF students who are 14 years or older. Review the need for adult service agencies to assist each student and if adult service agencies were invited to attend the ARD committee meeting. | Campus staff Case managers | October/November 2007 |
| | | | Convene ARD committee meetings for RF students who need to have transition services addressed in their current IEP. Invite adult service agencies, as appropriate. | ARD committees | October/November 2007 |
| | | | Conduct monitoring each six weeks of 20% of RF students to verify that transition services are being addressed annually and adult service agencies are invited to ARDs if needed. | Director of Special Education Supervisory Staff | October 2007 and ongoing |
| Extended School Year (ESY) Services 34 CFR §300.106 (a)(1) 34 CFR §300.320(a)(2), (4), (7) 19 TAC §89.1065 | ESY services will be determined by formal or informal assessment. ESY services will be based on the student's IEP goals and objectives. | All IEPS for RF students receiving ESY services will include documentation to support the need for the services and will include goals, objectives, frequency, | Conduct training for teachers, case managers, and related service providers to address: • Revised operating guidelines concerning ESY services; | ESY supervisors Teachers Case managers Related service Providers | October 2007 and February 2008 |

| | | duration, and location of services. | Process for determining the need for ESY; Process for determining the amount and duration of services; Regression/recoupment model; and Documentation of provision of ESY services. | | |
|--|--|---|--|---|--------------------------|
| | | | Conduct monitoring each six weeks of 20% of RF students to verify that RF students' IEPs contain documentation of need for ESY services, goals/objectives, frequency, duration, and location of services. | Director of Special Education Supervisory Staff | October 2007 and ongoing |
| Texas Assessment of Knowledge and Skills (TAKS) 34 CFR §300.320(a)(6) | RF students with disabilities will be assessed on the statewide assessment at the appropriate instructional level. | Statewide assessments for all RF students will be aligned to the students' levels of instruction. | Conduct training for LEA staff, including campus administrators, general and special education teachers, counselors, and case managers to address: • Revised operating guidelines concerning statewide assessment; • ARD Decision Making Manual 2007-2008; • Changes in the state assessments; and • Other information necessary to make appropriate ARD decisions regarding state assessments. | Director of Special Education Supervisory Staff | October 2007 |

| | | | Conduct a review of records all RF students to determine if appropriate statewide assessments have been determined for the 2007-2008 school year. | Campus staff Case managers | October/November 2007 |
|---|---|--|--|---|--------------------------|
| | | | Convene ARD committee meetings or ARD amendments, if necessary, to align the statewide assessment with a student's level of instruction. | ARD committees | October/November 2007 |
| | | | Conduct monitoring each six weeks of 20% of RF students to verify that statewide assessment decisions have been aligned with the students' levels of instruction. | Director of Special Education Supervisory Staff | October 2007 and ongoing |
| Individualized Decision Making: Instructional Services 34 CFR §300.320(a)(4) | ARD committees will make decisions concerning instructional services based on individual student needs. | ARD committees will review previous IEPs for all RF students when developing a new IEP and base all decisions on individual needs. | Conduct training for LEA staff addressing: Revised operating guidelines concerning individualized decision making for instructional services Review of all existing data when making decisions for IEP development | Director of Special Education Supervisory Staff | October 2007 |
| | | | Review records for all RF students to determine if the students' previous IEP was reviewed when making decisions for the current IEP. | Campus staff Case managers | October/November 2007 |
| | | | Convene ARD committee meetings for any student that needs to have previous IEP reviewed and/or revised. | ARD committees | October/November 2007 |

| | | | Conduct monitoring each six weeks of 20% of RF students to verify that students are being provided services based on individual needs. | Director of Special Education Supervisory Staff | October 2007 and ongoing |
|---|---|--|---|--|--------------------------|
| Content of IEP 34 CFR §300.320(4), (7) | Schedules of services in IEP will specify time for each academic and nonacademic area. | All schedules of services for RF students will specify times for each academic and nonacademic area. | Conduct training for teachers and case managers on indicating specific amounts of time for both academic and nonacademic areas indicated on the ARD schedule of services. | Director of Special Education Supervisory Staff | October 2007 |
| | | | Review all RF students' schedule of services to determine that specific class times are listed. | Campus staff Case Managers | October/November 2007 |
| | | | Convene ARD committee meetings or ARD amendments to revise schedule of services to list specific times for each academic and nonacademic areas, as needed. | ARD committees | October/November 2007 |
| | | | Conduct monitoring each six weeks of 20% of RF students to verify specific times are listed on RF student's schedules of services in IEP. | Director of Special Education Supervisory Staff | October 2007 and ongoing |
| Educational Benefit 34 CFR §300.17 34 CFR §300.101(a) | RF students with disabilities will be provided special education services that result in educational benefit to the students. | All RF students will be identified upon entry into the LEA and have special education services provided to them. | LEA will review and revise the process and procedures by which RF students are enrolled into the LEA and identified as students with disabilities. | Director of Special Education Supervisory Staff | October 2007 |
| | | | Conduct training with LEA personnel responsible for enrolling RF students to review the process of identifying which students are students with disabilities. | Director of Special Education Supervisory Staff Campus Administrators | October 2007 |

| Review records for all RF students to determine if any student was identified as a student with disabilities and did not receive special education services upon entry into the LEA and determine if an ARD committee meeting needs to be held. | Campus staff Case Managers | October/November 2007 |
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| Conduct ARD committee meetings, if needed, to consider compensatory services. | ARD committees | October/November 2007 |
| Conduct monitoring each six weeks of 20% of new RF students to the LEA to verify LEA procedures are resulting in identification of students with disabilities upon entry into the LEA. | Director of Special Education Supervisory Staff | October 2007 and ongoing |