September 16, 2013

Dr. Nettie Collins-Hart
Superintendent
Proviso Township High School District 209
8601 Roosevelt Road
Forest Park, Illinois 60130

Dear Dr. Collins-Hart:

Thank you for the courtesy extended to the representatives of the Illinois State Board of Education (ISBE) during the special education focused monitoring review conducted with the Proviso Township High School District 209 on April 16, 17, 29, and 30, 2013.

The enclosed report describes the focused monitoring process and identifies specific areas needing improvement. In addition, instructions are provided relative to required follow-up activities, including the implementation of corrective actions, the development of an improvement plan and documentation to be submitted as evidence of correction and change. Technical assistance regarding these activities will be provided by your assigned team leader, Paula Powers.

If you have any questions regarding this report or the focused monitoring process, please contact Paula Powers at 312/814-5560 or ppowers@isbe.net.

Sincerely,

David Andel
Division Administrator
Special Education Services Division

Paula Powers
Principal Education Consultant
Special Education Services Division
Focused Monitoring Report
of
Proviso Township High School District 209

Date of Final Report: September 16, 2013

Date of On-site Review: April 16, 17, 29, and 30, 2013

ISBE Team Leader: Paula Powers
ISBE Team Member: Denise McField
ISBE Team Member: Donna Brown
ISBE Team Member: Rhonda Marks
ISBE Team Member: Reginald Patterson
ISBE Team Member: Melissa Hummer
ISBE Team Member: Tonya Williams
ISBE Team Member: Robert Kroll
ISBE Team Member: Jane Lurquin
ISBE Team Member: Paul Nijensohn, Forum Translator
Parent Member: Tricia Luzadder
Peer Member: Lisa Caparelli-Ruff
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I. Description of Monitoring Authority and Focused Monitoring

The Individuals with Disabilities Education Act (IDEA), (20 U.S.C. 1400 (c)(1)), provides federal funds to assist states in the education of children with disabilities and requires each participating state to ensure that school districts and other publicly-funded educational agencies in the state comply with the legal and regulatory requirements of this federal act. Further, Section 616 of IDEA states that "the primary focus of Federal and State monitoring activities shall be on improving education results and functional outcomes for all children with disabilities and ensuring that States meet the program requirements with a particular emphasis on those requirements that are most closely related to improving educational results for students with disabilities." Illinois state law requires local school districts to provide appropriate special education and related services and requires the Illinois State Board of Education (ISBE) to establish, monitor, and enforce regulations governing special education programs in the Illinois public schools and all institutions wholly or partly supported by the state. The state has adopted regulations implementing those requirements which are administered by ISBE. ISBE supervises and conducts the general supervision process in furtherance of the state's obligations under IDEA and Illinois law.

Focused monitoring is an approach to determining compliance with federal and state special education law and regulations while also addressing critical performance areas. It is a shift from a culture of compliance to a culture of accountability. It places the emphasis of a monitoring review on results versus process. The principles of focused monitoring are identified as follows:

- Focused monitoring includes a limited number of priorities chosen by a diverse group of stakeholders.
- Available data are used to select priorities that will improve student educational performance, increase independence for children with disabilities, and lead these students to full participation in society.
- A limited number of indicators are identified within each priority area and are used as the basis for district ranking and selection for on-site reviews.
- A focused monitoring system is data- and information based. Data-based information is used to allocate limited resources to the areas of greatest need in order to effect the greatest improvement in student performance.
- There is a relationship between the monitoring process and the corrective actions as the specified solutions are linked to identified areas of concern. Corrective actions are designed to create systemic changes that result in improved student performance. Districts are required to address all identified areas of noncompliance.
- Families have the opportunity to provide information on a continuous basis.

With assistance from stakeholder groups, ISBE identified priority areas and critical performance indicators (CPIs) utilized in determining school districts most at risk for failure to meet performance. Specific indicators for focused monitoring are chosen annually by the Illinois State Advisory Council on the Education of Children with Disabilities (ISAC). Data submitted by the school district in the Funding and Child...
Tracking System (FACTS) are then analyzed by ISBE to identify the district's educational placement for students with disabilities. Critical Performance Indicator 5A concerns the percentage of students with Individualized Education Programs (IEPs) who are "served inside the regular class for 80% or more of the school day." This indicator was selected as the basis for determining the appropriateness of the educational environment of students with disabilities and to determine the school districts most at risk for failing to meet performance (high risk/low performance) standards.

The ISBE focused monitoring district selection process includes dividing districts into similar clusters based upon district type and enrollment size. ISBE utilizes district data from the State’s Special Education Monitoring/Reporting System (SEMRS) to rank and compare school districts on the selected critical performance indicator. In most instances, those districts in each cluster performing lowest on the indicator analysis will receive an on-site review.

The following formula was used to rank districts within the indicator:

*Each district with an N size of 30 students with disabilities is ranked on the percent of students with disabilities served under EE code 01 (inside the general education classroom more than 80% of the school day). If there are no districts (or very few districts) within a cluster that meet the N size, districts will be selected randomly from that cluster.*

<table>
<thead>
<tr>
<th>Educational Environment</th>
<th>Proviso Township High School District 209</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>2009-10</td>
</tr>
<tr>
<td></td>
<td>% of Time Inside General Education Classroom</td>
</tr>
<tr>
<td></td>
<td>≥80%</td>
</tr>
<tr>
<td>District</td>
<td>22.4</td>
</tr>
<tr>
<td>Coop.</td>
<td>41.9</td>
</tr>
<tr>
<td>All HS Districts</td>
<td>37.8</td>
</tr>
<tr>
<td>State Targets**</td>
<td>&gt;49.6</td>
</tr>
</tbody>
</table>

*Unit district data does not include Chicago Public Schools
**State Targets are indentified in the State Performance Plan, available at: [http://www.isbe.net/specedpdfs/state_performance.pdf](http://www.isbe.net/specedpdfs/state_performance.pdf)

In accordance with 34 CFR 300.600(e), "... the State must ensure that when it identifies noncompliance with the requirements of this part by LEAs, the noncompliance is corrected as soon as possible, and in no case later than one year after the State's identification on noncompliance" (December 2008). Furthermore, per the Office of Special Education Programs (OSEP) in memorandum 09-02, with further clarification provided at the 2010 OSEP Leadership Mega Conference, the required evidence of correction of noncompliance for LEAs must be a two-fold process. First, all instances of
identified noncompliance require immediate correction. Second, the LEA is required to provide additional, subsequent data to conclude that the LEA has achieved meaningful and sustained compliance. The ISBE monitoring system must review further updated data, as appropriate, to ensure the LEA achieves 100% compliance.

### II. Focused Monitoring Methodology

The on-site focused monitoring review was conducted at Proviso Township High School District 209 on April 16, 17, 29, and 30, 2013. The team visited two (2) high schools in the district. The monitoring team leader reviewed and analyzed the following data in relation to the on-site review.

#### Data Reviewed

- Special education policies and procedures
- District and School Improvement Plans
- Professional Development Plan
- School Report Card
- Special Education Profile
- Family/school collaboration
- FACTS data
- District website Information
- District description of special education programs and services

#### Forum

A public forum was held on April 17, 2013 for parents of students with disabilities and community stakeholders. The district provided documentation of adequate and appropriate public notice advertising the forum. There were two forums conducted simultaneously, one forum for English-speaking participants and one forum for Spanish-speaking participants. The two forums were attended by thirteen (13) parents of students with disabilities in one forum and twenty-five (25) parents of students with disabilities in the other forum, a total of thirty-eight (38) parents. There were also four (4) community stakeholders. The online parent survey was completed by a total of twenty-three (23) parents.

#### On-site Interviews

Interviews were conducted with six (6) administrators, twenty-three (23) general education teachers, six (6) special education teachers and seven (7) related services personnel. In addition, interviews were conducted with one (1) transition representative.

#### Record Reviews
Record reviews were conducted for fifty (50) students with Individualized Education Programs (IEPs). Records selected were representative of the students’ primary disabilities, age/grade levels, and special education programs within the district.

**Staff Surveys**

Surveys were collected from district personnel. Individuals who completed the surveys included one hundred thirty-eight (138) general education teachers, thirty-eight (38) special education teachers, eight (8) related service providers, and thirteen (13) administrators.

### III. Positive Aspects of the District Related to the Indicator

In relation to the identified critical performance indicator of the educational environment of students with disabilities, the following efforts and/or initiatives have been implemented by the district. These activities have been recognized as positive efforts on the part of the district to initiate improved student outcomes.

- Adoption of professional learning communities to allow teachers the opportunities to plan and work on a team basis to improve the learning environment of students.

### IV. District Findings Related to the Indicator

**Area of Noncompliance - Finding I**

Evidence demonstrates that placement decisions for students with disabilities are not made in compliance with federal regulations IDEA, Part B, 34 CFR §§ 300.116, 300.320, and 300.324. Based on the evidence collected and analyzed, placement decisions for students with disabilities are not based on the students’ unique needs as identified in the students’ IEPs. Evidence supports that the student’s disability, programs available, and the general educators’ level of expertise to meet students’ unique needs drive placement decisions at Proviso Township High School District 209. Placement decisions were additionally compromised by the district’s failure to address all IEP components.

34 CFR §300.116 Placements, which states,

b) The child’s placement-

   2) Is based on the child’s IEP;

34 CFR §300.320 Definition of individualized education program, which states,

a) General. As used in this part, the term individualized education program or IEP means a written statement for each child with a disability that is developed, reviewed, and revised in a meeting in accordance with §§ 300.320 through 300.324, and that must include-
1) A statement of the child’s present levels of academic achievement and functional performance, including:
   (i) How the child’s disability affects the child’s involvement and progress in the general education curriculum (i.e., the same curriculum as for nondisabled children);
4) A statement of the special education and related services and supplementary aids and services, based on peer-reviewed research to the extent practicable, to be provided to the child, or on behalf of the child, and a statement of the program modifications or supports for school personnel that will be provided to enable the child-
   ii) To be involved in and make progress in the general education curriculum in accordance with paragraph (a)(1) of this section, and to participate in extracurricular and other nonacademic activities; and
7) The projected date for the beginning of the services and modifications described in paragraph (a)(4) of this section, and the anticipated frequency, location, and duration of those services and modifications.

34 CFR §300.324 Development, review, and revision of IEP., which states,

a) Development of IEP-
   1) General. In developing each child’s IEP, the IEP Team must consider-
      i) The strengths of the child;
      ii) The concerns of the parents for enhancing the education of their child;

Supporting Evidence

Data Review
The data for school year 2011-2012 demonstrate a higher percentage of students by disability within certain educational environment categories. Only 1.9% of students with intellectual disabilities are in the general education classroom for 80% or more of the school day; in fact, 92.8% of these students were either in separate facilities or special education classrooms more than 60% of the day. Students with autism are also likely to receive a placement in a more restrictive setting as nearly 70% are in a separate facility and another 21% are in self-contained rooms. Additionally, 77.8% of students with emotional disabilities were removed from the general education setting with the majority (65.4%) placed in a separate facility. The percentage of students within certain disability categories with placements in separate facilities is extremely incongruent with the state’s targeted percentage of 3.90% for students with any disability receiving a separate placement.

District Educational Environment by Disability

<table>
<thead>
<tr>
<th>Disability</th>
<th>2011-12</th>
<th>Separate Facility</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>% of Time Inside General Classroom</td>
<td></td>
</tr>
<tr>
<td></td>
<td>&gt; 80%</td>
<td>40-79%</td>
</tr>
<tr>
<td>Intellectual Disability</td>
<td>1.9</td>
<td>5.2</td>
</tr>
<tr>
<td>Emotional Disability</td>
<td>13.5</td>
<td>8.6</td>
</tr>
</tbody>
</table>
In addition, 64% of the files reviewed at Proviso Township High School District 209 did not demonstrate that the educational placement of a child with a disability was based on the child’s IEP as required in 34 CFR § 300.116(b)(2). The 2009-2010 through 2011-2012 verified data indicate the percentage of students inside the general education classroom 80% or more of the day has shown a modest increase of only two percentage points over the past three years and remains low at only 24.4%. The 2011-2012 data indicates the percentages of students in the general education classroom less than 40% of the day is 27.9% and the percentage of students in separate facilities has increased to 28.3%.

The district is a part of the Proviso Area for Exceptional Children (PAEC) cooperative which has a separate facility within the district for placement of students with behavioral and emotional disabilities. The high percentages of students placed in these facilities greatly reduce opportunities for these students to access the general education curriculum and to participate with nondisabled students. One (1) general education teacher stated, "There used to be four self-contained classes here at Proviso. Now they just go to PAEC." The general education teachers indicated that if the students were at one of the two Proviso Township high schools instead of the separate facility, they would have the opportunity to participate with nondisabled students.

**Forum**

Separate forums were held in English and Spanish to accommodate parents and community stakeholders. The public forum participants expressed concerns about how placement decisions are made, their inclusion in that decision process, and accommodations and/or modifications and services. Although participants of the two public forums indicated that placement was discussed at the IEP meeting, parents at the first forum responded in the following way to questions about placement:

- 23% (3/13) of parents commented that there was no placement option offered.
- 77% (10/13) of parents were not sure.

At the second forum, parents responded in the following way to the same questions about placement:

- 28% (7/25) of parents in the second forum commented that there was only one placement offered for their children.
- 8% (2/25) of parents commented there were two placements discussed.
- 12% (3/25) of parents commented that there were three options offered.
- 52% (13/25) of parents were not sure.

A parent commented, "I was told what was going to happen. You have to bring and ask for what you want, it is not offered and you have to do research on your own." Three (3) other parents echoed these same sentiments.

<table>
<thead>
<tr>
<th>Specific Learning Disability</th>
<th>36.9</th>
<th>28.9</th>
<th>31.2</th>
<th>3.0</th>
</tr>
</thead>
<tbody>
<tr>
<td>Autism</td>
<td>7.9</td>
<td>2.6</td>
<td>21.1</td>
<td>68.4</td>
</tr>
<tr>
<td>SPP State Target</td>
<td>&gt;51.0</td>
<td>&lt;18.5</td>
<td>&lt;3.90</td>
<td></td>
</tr>
</tbody>
</table>
• One (1) parent indicated that her child was in the school for behavior and she does not agree with the placement. She stated, "They have my child in the school for behavior and I don't agree. Seems like they go there and they stay in that school. Some of those kids really act up bad."

• Seven (7) parents stated, "They (the district) may say they will offer it or give it, but they do not follow through, or it is indicated in the IEP but is not provided."

• Another parent commented, "My child's speech teacher was out for almost a year, and my child did not receive the services. Then I got a note at the end of the year that my child would get compensatory services over the summer, but that did not occur."

• All Spanish-speaking parents at the forum agreed that few accommodation and modifications options are discussed at the IEP meeting. Three (3) parents in this forum stated that accommodations and/or modifications have never been discussed and that this was new information for them.

Parents also expressed concerns about the placement of students with different special needs in the same room and that the conduct of students with behavior disabilities negatively affects students with other disabilities and learning needs. This concern was also expressed by the teachers in interviews as well as on the staff survey.

Concerns were also raised about the use of assistive technology in the district. One parent stated that, "My child had adaptive services in elementary school but at the high school they don't seem to know what such accommodations are." This parent also indicated her child had audio text in elementary school. She asked the high school for audio text for her child but was told it is not available at the high school level. Five (5) other parents voiced similar concerns about the lack of assistive technology.

Parents in both forums expressed concerns regarding communication from the district. They indicated they are not receiving information from the district regarding special education, types of services, and the programs available in the district. The Spanish-speaking parents further stated that they do not receive information from the administration or the special education teachers; instead, they rely on the counselors.

Parent Surveys
Participants in the parent survey and the parents that attended both the English-speaking and Spanish-speaking forums expressed the need for better communication from the district. Parents who responded to the survey 52% (12/23) indicated they did not participate in the discussion of placement for their child at the IEP meeting, and 30% (7/23) indicated their input was not obtained.

• "I was never informed what high school my child would attend until April 2013. I had no input what high school my child would attend. This should be my choice especially if both high schools offer special education and one is closest to my home."

• "Until now I have praised District 89 on how my child has improved. But the transition into high school District 209 is nerve-wracking."
• “I believe the district has been lacking in the practice of the least restrictive environment since my child’s grade school years.”
• “I would like for parents to get more information or notification of everything that is going on.”

The parents stated they do not feel like they are a part of the decisions regarding their children’s education. Spanish-speaking parents cited the language difference as a factor that inhibits the communication process and creates a feeling of separation. The latter feeling was also expressed by many English-speaking parents who report feeling disconnected from the school and all agreed that communication is an issue. These parents stated they do not receive sufficient information from the school and although they may be present in the IEP meetings, they do not believe they are included in placement decisions.

On-site Interviews
Among the staff interviewed, 97.7% (42/43) did not identify the general education setting as a placement option for special education students. The placements they identified all included special education.

- 2.3% (1/43) of all staff indicated general education was a placement option. The lone respondent who referenced inclusion was a general education teacher.
- 27.9% (12/43) of all staff indicated general education with removal for special education services.
  - 16.7% (1/6) administrators, 21.7% (5/23) general education teachers, 83.3% (5/6) special education and transition teachers, 14.3% (1/7) related service personnel.
- 41.8% (18/43) of all staff indicated full special education placement.
  - 83.3% (5/6) administrators, 34.8% (8/23) general education teachers, 0% (0/7) special education and transition teachers, 71.4% (5/7) related service personnel.
- 25.6% (11/43) did not know.
- 2.3% (1/43) indicated non-attendance at IEP meetings.

Staff interviewed reported several factors that contribute to the fact that students with IEPs are not being included in the general education classrooms. The factors cited included the behavior of the students, scheduling and programs available in the district or school, new students with more restrictive placements, and the staff’s level of expertise to successfully teach students with disabilities.

General education teachers (60.9% - 14/23), transition and special education teachers (42.9% - 3/7), and related service personnel (28.6% - 2/7) interviewed indicated that special education students demonstrated poor behavior and were unable to handle social relationships successfully. The staff survey comments stated that the closing of the self-contained emotional disability classrooms and overcrowding in some general education classrooms without support for students and staff has negatively impacted the school and increased behavioral issues. They further stated that these factors contributed to the students with disabilities being identified as being more disruptive and exhibiting poor behaviors in the classroom and school.
During the interviews, 73.9% of general education teachers (17/23) were unable to describe the process for determining the type, frequency, duration, or location of services for students with disabilities. Teachers indicated that they were not part of this process as it did not occur while they were in the IEP meeting. Data from the staff survey support that 47% of staff does not always remain until the IEP meeting is finished.

The staff survey also reports that 76.5% of staff does not always have an active role in the determination of the necessary supports for school personnel in order to assist students with disabilities to be successful in school. In addition, general education teachers stated that they are given a list of accommodations for the students; however, training is not provided to assist them in implementing the accommodations for the specific students. One teacher stated, “We are given a long list of accommodations but I cannot do them all. I just do the best I can.” Another teacher stated, “Sometimes there is too much checked off, so there is not ample time and I’m not able to do all that is asked in the time given.”

General education teachers stated it was difficult trying to meet the needs of these students in the general education classroom without behavioral supports aides in overcrowded classrooms, and implementation of co-teaching practices.

**Record Reviews**

The record reviews conducted revealed that there are several required components of the IEP that were not regularly addressed. The file reviews of the fifty (50) IEPs documented the following noncompliance:

- the concerns of the parent to enhance the education of their child 70% (35/50),
- the supports for school personnel to enable the child to be educated and participate with other children 88% (44/50), and
- the extent the student will not participate with nondisabled students in extracurricular and other non-academic activities 54% (27/50).

The superintendent, principals, and special education coordinators indicated that the district is a part of the PAEC cooperative that utilizes an electronic IEP for their member districts.

The student record reviews at Proviso Township High School District 209 documented high percentages of noncompliance in several other IEP areas.

- The records reviewed indicated that 60% of IEPs did not include the projected start or end date for special education services, the anticipated frequency, location, and duration of those services and modifications as required in 34 CFR 300.320(a)(7). The IEPs indicate the number of minutes of special education cross-categorical classes as a total amount of minutes and do not contain the specific courses or classes that students receive for services. The superintendent and coordinator stated that the district’s electronic IEP calculated the percentage of time in general education classrooms; however, they informed the team leader that the calculation was based on inaccurate data. They
indicated that in many cases the data reported to ISBE was not accurate and that the district and cooperative were in the process of correcting the errors.

- File reviews also revealed that 64% of IEPs (32/50) identified placement decisions that were not based on the individual needs of each student and did not reflect consideration of student strengths.
- Slightly more than half of all IEPs (52% - 26/50) did not contain the appropriate parental notification of conference.
- Nearly half of all IEPs (46% - 23/50) did not contain a statement of a student’s present performance levels and/or an explanation of how the disability affects involvement in the general education curriculum.
- Other IEP deficiencies included the timeliness of annual placement reviews, appropriate team members at IEP meetings, consideration of supplemental aids and accommodations/modifications, and statements detailing the harmful effects of a placement.

**Staff Surveys**

Surveys completed by staff specify scheduling and limited class options are factors that determine placements. The district’s schedule previously contained eight (8) periods per day; however, this year there are seven (7) periods per day. Staff reported this decrease resulted in a reduction of course offerings for special education students, as well as a reduction in classes that were of interest to these students. In addition, teaching staff revealed that many classrooms are experiencing overcrowding and that co-teaching, which allowed special education students greater access to general education course opportunities, was discontinued.

The staff survey revealed that 79% of respondents do not always have an active role in determining the extent to which students with a disability will participate in the general education classroom.

**Summary of Evidence**

Based upon the evidence from the data analysis, record review, interviews, forums, and surveys, placement decisions are based on the disability category, programs available, and other factors unrelated to specific student need. The student record reviews documented high percentages of noncompliance, partly as a result of missing specific, required components in the district IEP and also because of the district’s failure to thoroughly address other IEP elements such as harmful effects of placement and a full description of services (frequency, duration, etc.). Furthermore, parents expressed concerns regarding not being a part of the process for determining the placement of their children, lack of awareness of the special education programs available, the district’s failure to provide or implement supplementary aids and services, and the need for ongoing communication.

**Corrective Action**

The district must address all areas of supporting evidence to ensure that placement decisions for students with disabilities are made in compliance with state and federal regulations. The district improvement plan should address the following areas:
The district needs to incorporate the specific information required by federal regulations into the district IEP and submit to ISBE for approval.

The district must provide professional development and training for general education and special education teachers, LEAs, and the administrative team related to special education and IEP development. All training requires pre-approval by the team leader. ISBE will also provide professional development.

The district needs to provide supports for school personnel, including training and workshops specific to the implementation of accommodations and modifications. ISBE will also provide professional development relative to this issue.

The district should provide parents information related to the IEP regarding placement options, how decisions are made, and parental rights and responsibilities.

**Required Evidence of Correction - Immediate**

The following evidence will be reviewed to demonstrate that all individual instances of noncompliance in the records reviewed during the focused monitoring process have been corrected:

- Appropriate Parent/Guardian Notification of Conference – 52% (26/50)
- Appropriate team members present at IEP meeting – 24% (12/50)
- Placement determined at least annually – 28% (14/50)
- Consideration of the concerns of the parents – 70% (35/50)
- Statement of the present levels of achievement and performance and how it affects involvement – 46% (23/50)
- Supplemental aids, accommodation, modifications and special factors – 18% (9/50)
- Supports for school personnel – 88% (44/50)
- Statement of location, frequency, initiation and duration – 60% (30/50)
- Explanation of extent of non-participation with nondisabled children – 26% (13/50)
- Explanation of extent of non-participation in extracurricular and nonacademic – 54% (27/50)
- Potential harmful effects on child or quality of services needed – 16% (8/50)
- Placement based on the child's IEP – 64% (32/50)

By November 15, 2013 the district must demonstrate correction of each individual case of noncompliance. The documentation in 100% of the following records must be corrected to demonstrate the required evidence of immediate correction.

<table>
<thead>
<tr>
<th>Issues with Citation</th>
<th>% of IEPs with Identified Noncompliance</th>
</tr>
</thead>
<tbody>
<tr>
<td>An appropriate Parent/Guardian Notification of Conference was completed and sent 10 days prior to the date of the meeting. 34 CFR 300.503; 34 CFR 300.321(b)(1) 23 IAC 225.520</td>
<td>52%</td>
</tr>
<tr>
<td>Specific IEPs with Identified Noncompliance: PHS1 PHS2 PHS5 PHS19 PHS20</td>
<td></td>
</tr>
<tr>
<td>PHS21</td>
<td>PHS22</td>
</tr>
</tbody>
</table>
The appropriate team members were present at the IEP meeting, verified on the Conference Summary Report (minimum participants: parent, LEA representative, special educator, and general educator, and any other person responsible for implementing a portion of the IEP). 34 CFR 300.116(a)(1); 34 CFR 300.321(a); 34 CFR 300.322(c)(d)(1)(2)(3); 23 IAC 226.210

Specific IEPs with Identified Noncompliance:  
- PHS2  
- PHS4  
- PHS20  
- PHS26  
- PHS29  

When determining placement, the IEP team ensured that the placement is determined at least annually. 34 CFR 300.116(b)(1)

Specific IEPs with Identified Noncompliance:  
- PHS4  
- PHS9  
- PHS13  
- PHS30  
- PHS34  

In developing each child’s IEP, the IEP Team must consider the concerns of the parents for enhancing the education of their child. 34 CFR 300.324(a)(1)(ii)

Specific IEPs with Identified Noncompliance:  
- PHS1  
- PHS2  
- PHS3  
- PHS4  
- PHS5  
- PHS8  
- PHS10  
- PHS11  
- PHS12  
- PHS14  
- PHS15  
- PHS16  
- PHS17  
- PHS18  
- PHS20  
- PHS22  
- PHS23  
- PHS24  
- PHS27  
- PHS29  
- PHS30  
- PHS31  
- PHS32  
- PHS36  
- PHS37  

The IEP includes a statement of the child’s present levels of academic achievement and functional performance, including how the child’s disability affects the child’s involvement and progress in the general education curriculum (i.e., the same curriculum as for disabled children). 34 CFR 300.320(a)(1)(i)

Specific IEPs with Identified Noncompliance:  
- PHS1  
- PHS2  
- PHS3  
- PHS4  
- PHS5  
- PHS15  
- PHS18  
- PHS20  
- PHS22  
- PHS23  
- PHS24  
- PHS27  
- PHS29  
- PHS30  
- PHS31  
- PHS32  
- PHS34  
- PHS35  
- PHS37  
- PHS40  
- PHS42  
- PHS43  
- PHS44  
- PHS45  
- PHS46  
- PHS47  
- PHS48  

The IEP addresses the need for supplementary aids, program modifications, and special factors. If needed, there is a statement of the program modifications and supplementary aids. 34 CFR 300.320(a)(4); CFR 300.324(a)(2)

Specific IEPs with Identified Noncompliance:  
- PHS24  
- PHS30  
- PHS32  
- PHS50  

The IEP contains a statement of supports for school personnel that will be provided to enable the child to be educated and participate with other children and nondisabled children. 34 CFR 300.320(a)(4); 34 CFR 300.320(4)(ii)

Specific IEPs with Identified Noncompliance:  
- PHS7  
- PHS8  
- PHS9  
- PHS10  
- PHS12  
- PHS13  
- PHS14  
- PHS15  
- PHS16  
- PHS17  
- PHS18  
- PHS19  
- PHS20  
- PHS21  
- PHS22  
- PHS23  
- PHS24  
- PHS27  
- PHS28  
- PHS29  
- PHS30  
- PHS31  
- PHS32  
- PHS34  
- PHS35  
- PHS36  
- PHS37  
- PHS38  
- PHS40  
- PHS41  
- PHS42  
- PHS43  
- PHS44  
- PHS45  
- PHS46  
- PHS47  
- PHS48  
- PHS49  
- PHS50
The IEP includes the projected date for the beginning of the special education and related services; the supplementary aids and modifications provided to the child; and the anticipated frequency, location, and duration of those services and modifications. 34 CFR 300.320(a)(7)

| Specific IEPs with Identified Noncompliance: | PHS1 | PHS6 | PHS8 | PHS9 | PHS10 |
| PHS11 | PHS13 | PHS14 | PHS15 | PHS16 | PHS17 | PHS19 | PHS20 | PHS23 | PHS26 |
| PHS27 | PHS28 | PHS29 | PHS30 | PHS31 | PHS32 | PHS33 | PHS34 | PHS35 | PHS39 |
| PHS42 | PHS43 | PHS45 | PHS48 | PHS50 |

The IEP contains an explanation of the extent, if any, to which the student will not participate with nondisabled students in the general education curriculum. 34 CFR 300.320(a)(5)

| Specific IEPs with Identified Noncompliance: | PHS3 | PHS11 | PHS15 | PHS18 | PHS22 |
| PHS30 | PHS33 | PHS36 | PHS39 | PHS40 | PHS41 | PHS44 | PHS50 |

The IEP contains an explanation of the extent, if any, to which the student will not participate with nondisabled students in extracurricular and other nonacademic activities 34 CFR 300.320(a)(4)(ii); 34 CFR 300.320(a)(5)

| Specific IEPs with Identified Noncompliance: | PHS1 | PHS3 | PHS5 | PHS15 | PHS16 |
| PHS19 | PHS27 | PHS28 | PHS29 | PHS30 | PHS31 | PHS32 | PHS33 | PHS34 | PHS35 |
| PHS36 | PHS37 | PHS38 | PHS40 | PHS42 | PHS43 | PHS44 | PHS45 | PHS46 | PHS48 |
| PHS49 | PHS50 |

In selecting the LRE, consideration is given to any potential harmful effects on the child or on the quality of services that he or she needs. 34 CFR 300.116(b)(2)(d)

| Specific IEPs with Identified Noncompliance: | PHS15 | PHS16 | PHS20 | PHS21 | PHS23 |
| PHS30 | PHS35 | PHS50 |

When determining educational placement of a child with a disability, the IEP team ensured that the placement is based on the child’s IEP and with the development of the IEP, the IEP team must consider the strengths of the child. 34 CFR 300.116(b)(2)

| Specific IEPs with Identified Noncompliance: | PHS1 | PHS2 | PHS5 | PHS6 | PHS8 |
| PHS9 | PHS12 | PHS13 | PHS14 | PHS15 | PHS18 | PHS19 | PHS20 | PHS22 | PHS24 |
| PHS26 | PHS27 | PHS29 | PHS30 | PHS31 | PHS32 | PHS33 | PHS34 | PHS35 | PHS39 |
| PHS40 | PHS42 | PHS43 | PHS44 | PHS47 | PHS48 | PHS50 |

See Appendix A for student identifier information for each IEP.

Required Evidence of Correction - Subsequent

To ensure that the district is correctly implementing the specific regulatory requirements, the team leader must review updated data. On September 30, 2014 the ISBE team leader will randomly select twenty-five (25) records for review. The documentation in 100% of the records will include evidence of:
• Appropriate Parent/Guardian Notification of Conference
• Appropriate team members present at IEP meeting
• Placement is determined at least annually
• Consideration of the concerns of the parents
• Statement of present levels of achievement and how affects involvement
• Supplemental aids, accommodation, modifications and special factors
• Supports for school personnel
• Statement of location, frequency, initiation and duration
• Explanation of extent of non-participation with nondisabled students
• Explanation of extent of non-participation in extracurricular and non-academic
• Potential harmful effects on child or quality of services needed
• Placement is based on the child’s IEP

Required Evidence of Change

The district must provide the following evidence of change specific to the identified findings of noncompliance. The evidence of change is designed to ensure that modifications have been made within the district that have ultimately led to improved performance on the indicator as reflected in the district’s data. The verified Educational Environment (EE) data for the 2011-12 school year identifies that 24.4% of students with disabilities are served 80% or more of the time in the general education setting (EE 01); the district data must improve in this area by six (6) percentage points. This benchmark for improvement will be the change in the district’s educational environment data EE 01 by September 30, 2015 to 30.4%.

V. Areas Needing Further Action

• The district should consider the reinstatement of co-taught courses and sections in core subjects to provide support in the general education classroom for students. The district should also ensure all staff receives formal co-teaching training.
• The district should also provide training and targeted collaboration time for the general and special education teachers to facilitate their focus on student needs, strategies, accommodations and modifications, and student behavioral issues.
• The Positive Behavior Interventions and Support system or similar district-wide system should be implemented to assist with behavior concerns.
• The district should develop a parent involvement plan in Spanish and English which would include regular and consistent communication to parents regarding their children, and include workshops, informational meetings, and information regarding special education and implementation of the IEP. This plan would be available for parents.
• Expand the district website to include relevant information in Spanish and, if possible, other languages.
Upon receiving this final report, Proviso Township High School District 209 is required to use the District Improvement Plan (DIP) template in the Illinois Interactive Report Card (IIRC) website to develop and submit a proposed improvement plan to ISBE within a period of 45 calendar days from the date of the final report. The improvement plan will be submitted electronically through the DIP process. This template is found at http://iirc.niu.edu/. The school district superintendent may access the template by entering the district password, which is managed by the district superintendent. The DIP for special education focused monitoring must address all four sections of the template: data and analysis; action plan; plan development, review and implementation; and board action. If the school district has an existing DIP, strategies and activities related to special education must be incorporated into the existing plan to ensure alignment with current district initiatives.

After the district receives the final report, the ISBE team leader will contact the district to begin the improvement plan process. In order to ensure that the improvement plan is comprehensive, interdisciplinary, and district-wide, the plan must be developed by a team. Depending upon the issues of noncompliance, the team should include the district superintendent (or another general education administrator who has the authority to commit district time and resources), the special education director or another special education administrator, a Regional Office of Education (ROE) representative, a general education teacher, a special education teacher, a related services staff member, the professional development coordinator, the curriculum coordinator, parents, and others, as necessary. This plan must not be a uniquely special education response developed in isolation from other district initiatives. The ISBE team leader is available to participate in the initial meeting of the improvement plan team to provide technical assistance. The team leader is not typically the provider of trainings or professional development activities; however, the team leader may have suggestions regarding training or professional development providers.

The team leader will work with the district to make any necessary revisions. When all revisions are completed, the district will submit the final version to ISBE for approval by the team leader. Final approval of the improvement plan must be made within 60 calendar days from the date of the final report and the district will be issued an approval letter. The approval letter will also outline the schedule for reporting the district’s progress to ISBE.

Progress Reports

Upon receipt of each progress report and any required documentation, the ISBE team leader will review the report to ensure that the district is monitoring its own progress. Once any needed clarification is received, an approval letter will be issued. If it becomes evident that the district is not making progress that is likely to lead to the expected evidence of change within the required timeline, the team leader will schedule a meeting with the district to discuss the improvement plan.
Evidence of Correction Review

The evidence of correction review is a two-fold approach to ensure that the district has corrected all instances of noncompliance and is able to demonstrate evidence that will result in sustained compliance. In order for the LEA to demonstrate evidence of correction, immediate correction and subsequent correction must be verified by ISBE to show 100% compliance. Immediate correction will be verified within 60 days of the identification of noncompliance and the subsequent evidence of correction review will take place at the end of the first year of the focused monitoring process. This final report is the district's written notification of noncompliance and the date of this report begins the timelines for evidence of correction. Based on the results of the review, ISBE will make one of two determinations:

- the district has met the standards required for evidence of correction and officially close the section of the focused monitoring process, or
- the district has not met the standards required and additional time will be permitted for the district to continue to work on their required evidence of correction. In the latter instance, the team leader will continue to provide technical assistance to the district.

VII. Closing the Focused Monitoring Process

Focused monitoring is a two year process. In order for districts to conclude this process, they must complete the requirements as specified in this final report for evidence of correction and evidence of change. The requirements for evidence of correction are addressed and monitored through the improvement plan process as discussed previously. The evidence of correction review takes place at the end of the first year of the focused monitoring process.

Evidence of Change Review

The evidence of change review takes place at the end of the second year of the focused monitoring process. Evidence of change is designed to ensure that modifications have been made within the district that have ultimately led to improved performance on the indicator as reflected in the district's data. Two years after the date of this final report, the focused monitoring team leader will review the district's data to determine the degree of change in the data. The expected change in data is stated in this document. After review of the data, the team leader will submit a letter informing the district of the results of this data review. If the expected change is achieved, an approval letter will be submitted to the district which will close the focused monitoring process. If, however, the district does not achieve the expected change in data, the district will be informed in writing that further action is necessary. The team leader will continue to work with the district to determine the further action that will need to be carried out before the focused monitoring process can be officially closed.
In summary, the team leader will be available to participate in the initial meeting of the improvement plan process, as well as to provide or facilitate on-going technical assistance regarding the activities identified in this report. The team leader will verify immediate and subsequent corrective action as identified in this report. Throughout the first year after the final report, the district’s progress reports will be reviewed by the team leader to ensure improvements are being made in the district to promote improved performance on the placement decisions for students with disabilities. At the end of the first year, the subsequent evidence of correction review will occur with the district to determine whether or not the district is able to demonstrate 100% compliance to the specific regulatory requirements through updated data. At the end of the second year, an evidence of change review will occur to ensure that the activities and modifications made by the district have resulted in improved performance as reflected in the district’s data.

If you have any questions, you may contact Paula Powers at 312/814-5560 or ppowers@isbe.net.