

Washington Integrated System of Monitoring (WISM) Final Report

Adapted from Critical Elements Analysis Guide (CrEAG) IDEA 2004 - Part B (3/9/2011)

LEA/ESA: Lake Washington Designated Local Contact: Paul Vine, Director of Special Services Date(s): March 28–29, 2018
Reviewer(s): Janice Tornow, Jennifer Story, Lee Collyer Report Issued: May 22, 2018

SYSTEMS ANALYSIS OVERVIEW

The OSPI Special Education Program Review Team conducted a Systems Analysis On-site Visit at Lake Washington School District on March 28–29, 2018. The purpose of the Systems Analysis was to review the district’s systems for collection and reporting of special education data, fiscal management, and dispute resolution as well as determine the district’s compliance with federal requirements under IDEA and applicable state requirements regarding the provision of special education and related services for identified, eligible students. The Special Education Program Review Team members that conducted the Systems Analysis for the district were Janice Tornow, Jennifer Story, and Lee Collyer. A description of the process utilized to collect the qualitative data and quantitative information to support the report is as follows:

1. Pre-visit data collection – The district provided information to OSPI prior to the on-site visit. The information included documentation related to each of the five identified Critical Elements (refer to the Scope of Review section under each Critical Element for a list of the documentation reviewed). The district also provided copies of the records of individual students who were selected to be part of the student-level review.
2. On-site visit data collection – The team conducted a core on-site visit to verify the pre-visit data submitted by the district, review the program for selected students with disabilities, and gather additional information related to the Critical Elements through targeted interviews, work sessions, and focus groups. Special education programs and services for the selected students were verified through interviews, classroom visitations, and review of student schedules.
3. Post-visit data collection – The team reviewed and synthesized the information gathered during the pre-visit and on-site visit phases, and developed this final report. Actions required as a result of the Systems Analysis review are identified in this report under each Critical Element and summarized in Appendix A – Required Actions Tracker. Student-level issues of non-compliance are required to be corrected as soon as possible but no later than the due date of the correction cycle (March 1, 2019).

DISTRICT OVERVIEW

District Overview: Lake Washington is an extra-large, suburban school district that serves about 29,626 students, and approximately 3,214 students receive special education and related services (*Report 1220, March 2018*). The district has four high schools, seven middle schools, 27 elementary schools, and 16 alternative schools/programs. The special education on-site team members sampled 98 student files, representing approximately 3% of the district’s total special education population, and visited six school buildings. Refer to the Summary of the Review section below for more information on the types of activities conducted as part of the review.

SUMMARY OF THE REVIEW

School Buildings with Interviews	6	School-level Focus Groups	6
Service Provider Interviews	17	District-level Focus Groups	5
Classroom Observations	7	Targeted Interviews	1
District-level Work Sessions	1	District-level Conference Calls	3
Equitable Services Interviews	2		

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Critical Element I–Data Management: Does the LEA/ESA have a data system that is reasonably designed to timely collect and report data that are valid and reliable and reflect actual practice and performance?

- A. How does the LEA/ESA ensure that its data systems collect and report valid and reliable data in a timely manner?
- B. How does the LEA/ESA ensure that data collected at the local level reflect actual practice and performance?
- C. Describe the LEA/ESA’s procedures for ensuring timely correction.
- D. If applicable, describe the LEA/ESA’s procedures for collecting and reporting CEIS program data.

SCOPE OF REVIEW

Documentation and information obtained as a result of pre-visit and on-site review activities were examined, including:

- Performance Data Profile for the past three years
- Systems Analysis Questionnaire
- 2017–18 Least Restrictive Environment (LRE) Verification Calculator (LRE Calculator) and Building Schedules
- Three years of compliance findings
- Three years of dispute resolution decisions/actions
- Administrative interview with the Director
- Indicator B-12 C to B reporting for past three years
- Indicator B-14 Post-School response rate

AREAS OF STRENGTH

- During the March 28-29, 2018, WISM on-site review, the Program Review team confirmed the district has the following data management components in place: (a) Data Collection, (b) Data Compilation and Reporting, (c) Data Verification and Improvement, and (d) Data Decision Making.
- Multiple data systems are used to collect and report valid and reliable data to the state and the public in a timely manner, including Skyward, IEP.Online (IEPO), Comprehensive Education Data and Research System (CEDARS), the district’s personnel and fiscal systems, the state’s Test Information Distribution Engine (TIDE), the Post-School Outcomes Survey (POS) data platform at the Center for Change in Transition Services (CCTS), and the state’s Child Outcomes Summary Form (COSF).
- Routine and ad hoc procedures, practices, and internal controls have been used to collect, identify, and resolve data anomalies; verify data accuracy; answer specific questions; and report valid and reliable data and information to the state and public in a timely manner during the three-year period reviewed.¹
- The district described the system used to analyze data on state-level assessments (Indicator B-3) at the district and building levels in order to improve performance for students with disabilities including school-level goal setting and strategies that are incorporated into Continuous Improvement Plans (CIPs) and use of the data to develop districtwide intervention strategies such as co-teaching in English Language Arts (ELA) and mathematics classes within the Multi-Tiered System of Supports (MTSS) framework.
- The file review results were found to be consistent with the district’s Indicator B-12 C to B Transition reporting periods for 2015–16 and 2016–17.

¹ OSPI’s Special Education Data Manager verified that the district also timely submitted all required reports for 2017–18 as of December 31, 2017.

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- The district provided a description of its process used to collect Indicator B-14 Post-School Outcome data resulting in response rates of 74.4% (2014 leavers), 72.3% (2015 leavers), and 74.5% (2016 leavers). The district’s response rates exceeded the state target of 70%.
- The district has demonstrated the ability to ensure timely correction of any identified non-compliance over the three-year time period reviewed.²
- Bell schedules matched the total instructional minutes for all ten schools submitted in the 2017–18 LRE Calculator (iGrants Form Package 267).
- The district has an ongoing plan for collecting parent input and perceptions through an annual web and phone survey and work with the PTSA Special Needs Group (SNG) and Parent Advisory Committee (PAC). In addition, the district contracted with the Special Education Urban Collaborative to conduct a Program Review of special education services. Included in their review was an opportunity to meet with parents and students with disabilities to get their feedback on their experiences in the district. Multiple meetings at various venues and times were scheduled for the community and parents to give feedback to the Urban Collaborative to be integrated in the final report. The district also integrated the 2015–16 WISM Parent survey into the final Special Services Program Review Report. The Final Report is publicly posted at http://lwsdorg.finalsite.com/uploaded/Website/Board/Study_Sessions/2016_09_19/Special-Services-Review.pdf.

REQUIRED ACTIONS

(see Appendix A – Required Actions Tracker)

- None

RECOMMENDATIONS FOR PROGRAM IMPROVEMENT

- None

Interview Info.	Interview Summary:
<ul style="list-style-type: none"> • Administrative Interview 	March 28, 2018—Paul Vine, Director of Special Services
<ul style="list-style-type: none"> • Data Verification Focus Group 	March 28 th , 2018 —Paul Vine, Director of Special Services; Laurel Morton, Enrollment; Carmen Urruta, Data Services Manager

Related Requirements	
<p>IDEA 2004 REQUIREMENTS:</p> <p>34 CFR §300.640 [Annual report of children served--report requirement]</p> <p>34 CFR §300.641 [Annual report of children served--information required in the report]</p> <p>34 CFR §300.642 [Data Reporting]</p>	<p>WASHINGTON ADMINISTRATIVE CODE:</p> <p>392-172A-06045 School district information for OSPI</p> <p>392-172A-07015 Performance goals and indicators</p> <p>392-172A-07020 State performance plans and data collection</p>

² The district completed correction summaries (iGrants Form Package 442) for student specific issues (2014–15, 2015–16, and 2016–17). The district was not required to complete a correction summary in 2017–18.

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34 CFR §300.643 [Annual report of children served—certification]	392-172A-07025 State use of targets and reporting
34 CFR §300.644 [Annual report of children served--criteria for counting children]	392-172A-07030 State enforcement
34 CFR §§ 300.600 through 300.608 [State enforcement]	392-172A-07035 Child Count

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- Critical Element II: Fiscal Accountability –
- (1): Does the LEA/ESA have procedures that are reasonably designed to ensure that funds are budgeted and expended in accordance with Federal requirements?
- A. Does the LEA/ESA have procedures in place to track time and effort for personnel and related costs charged to IDEA Part B funds?
 - B. How does the LEA/ESA ensure that it expends IDEA funds only for the excess costs of providing special education and related services to eligible children with disabilities?
 - C. If applicable, describe the process for documenting and reporting CEIS fiscal data.
- (2): Does the LEA/ESA have procedures that are reasonably designed to ensure the allowable use of IDEA funds?
- A. How does the LEA/ESA ensure that funds are used to provide services in accordance with the requirements of EDGAR and the IDEA?
 - B. How does the LEA/ESA ensure that it uses the required proportionate share of Federal funds under 34 CFR §300.133(b) to provide equitable services to children with disabilities placed by their parents in private schools?
 - C. How does the LEA/ESA ensure that it maintains financial and programmatic records for the period of time required by State and Federal law?
 - D. How does the LEA/ESA ensure sole use of property purchased by it with Part B funds? How does the LEA/ESA ensure that it maintains a physical inventory of property purchased with Part B funds?
 - E. Describe the LEA/ESA procedures for ensuring that contracts paid using IDEA Part B funds are properly approved, have clear deliverables, and are properly monitored.

SCOPE OF REVIEW

- Documentation and information obtained as a result of pre-review and on-site review activities were examined, including:
- 2017–18 Assurances for the Individuals with Disabilities Education Act (IDEA) Part B
 - Special Education Policy & Procedures
 - Program Risk-Based Self-Assessment
 - Systems Analysis Questionnaire (Items A-D)
 - Documentation Checklist Submission (Items #4-#9)
 - 2017–2018 Excess Cost Template
 - F-196 Annual Financial Statement (year-ending August 2016)
 - Special Education Enrollment Report 1735T
 - Special Education Allocation Report 1220
 - 2017–18 F-195 Budget Overview
 - School board policies and procedures for student records, financial and programmatic records retention, capital assets, and procurement.

AREAS OF STRENGTH

- The district has approved policies and procedures for (a) special education, (b) financial and programmatic records retention, (c) student records, (d) capital assets/sole use, and (e) purchasing/procurement/contracting posted to the district's website at (<https://www.lwsd.org/about-us/policy-and-regulations>).
- The district's federal fund application was timely submitted and included required components including signed Assurances it will operate its 2017–18 IDEA program in accordance with 20 U.S.C. 1400 et seq., 34 CFR Part 300 and WAC 392-172A; excess cost

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documentation; Section 611 and 619 spending plans and supporting budgets; and equitable services counts, private school consultation, and budget information.

- The district met IDEA eligibility and compliance using the new LEA MOE Calculator.³
- Based on a review of the district’s description of its monthly special education enrollment reporting (P-223H) and student exception processes, including the October 2017 Exceptions report, the district has a system in place for ensuring accurate monthly enrollment reporting.
- The district provided descriptions of its contract procurement (Object 700), time and effort, and inventory practices. The district’s description of its contract procurement processes include protocols for obtaining contract approval with delineated deliverables and activities/strategies to monitor receipt of goods/services prior to payment.⁴
- The district’s description and documentation of its procedures to track time and effort for required personnel and related costs included the use of monthly Personnel Activity Reports (PARs) for multiple-cost objective personnel, semi-annual certification for single-cost objective personnel, internal controls for supplemental time and effort documentation, staff reassignment protocols, and quarterly reconciliation or year-end payroll adjustments. Further, the S-275 Personnel Report (dated December 15, 2017) was verified during the Fiscal Interview and found to be consistent with the certificated and classified personnel time and effort samples submitted by the district.
- The district provided documentation confirming the 2016–17 consultation process including letters inviting the 13 private schools to a consultation meeting, follow-up letters of invitation and reminders about the consultation meeting, meeting agenda and notes, and written affirmations signed by two of the 13 approved private schools.
- The district receives reimbursement for Medicaid services on behalf of eligible students with disabilities. Total claims as of July 2017 were \$111,969. This revenue is available for use in the special education program.

REQUIRED ACTIONS

(see Appendix A – Required Actions Tracker)

- None

RECOMMENDATIONS FOR PROGRAM IMPROVEMENT

- None

³ The LEA MOE Calculator is located at <http://www.k12.wa.us/SpecialEd/Finance-Grants/Funding.aspx>.

⁴ Based on a review of the last two consecutive F-196 Annual Financial Statements, the district expended federal special education funds for purchased services (Object 700) during the 2015–16 and 2016–17 school years, and budgeted for purchased services in the 2017–18 federal special education fund application. These expenditures are consistent with the IDEA federal fund spending plans and budgets for the school years reviewed.

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Interview Information	Interview Summary
<ul style="list-style-type: none"> Administrative Interview 	March 28, 2018—Paul Vine, Director of Special Services
<ul style="list-style-type: none"> Fiscal Accountability Focus Group 	March 28, 2018 —Paul Vine, Director of Special Services; Mary Geil, Special Services Fiscal and Program Supervisor; and Lynne Pyke, Budget and Fiscal Manager
Related Requirements	
EDGAR: 34 CFR §76.702 [Fiscal control and fund accounting procedures] 34 CFR §76.703 [When a LEA/ESA may begin to obligate funds] 34 CFR §76.707 [When obligations are made] 34 CFR §76.708 [When certain subgrantees may begin to obligate funds] 34 CFR §76.709 [Funds may be obligated during a “carryover period”] (Tydings Amendment to GEPA) 34 CFR §76.710 [Obligations made during a carryover period are subject to current statutes, regulations, and applications] 34 CFR §80.22 [Allowable costs] 34 CFR §80.23 [Period of availability of funds]	
IDEA 2004 REQUIREMENTS: 34 CFR §300.12 [Educational service agency] 34 CFR §300.16 [Excess costs] 34 CFR §300.28 [Local educational agency] 34 CFR §§300.200-300.230 [Subpart C - Local Educational Agency Eligibility] 34 CFR §§300.704 [LEA/ESA level activities] Appendix A to Part 300 [Excess Costs Calculation]	
WASHINGTON ADMINISTRATIVE CODE: 372-172A-01055 [Education service district] 372-172A-01075 [Excess cost] 372-172A-01115 [Local educational agency] 372-172A-06000—06095 [Local Educational Agency Eligibility] 372-172A-07055 [State safety net fund for high need students] Appendix A [Allowable Costs] Appendix B [Selected Items of Cost]	
OMB Circular A-87: Appendix A [Allowable Costs] Appendix B [Selected Items of Cost]	
OMB Circular A-133 Compliance Supplement for Department of Education	

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Critical Element III–Dispute Resolution: Does the LEA/ESA have procedures and practices that are reasonably designed to implement the dispute resolution requirements of IDEA?

- A. How does the LEA/ESA ensure the implementation of complaint decisions to address district systemic issues and/ or student specific violations?
- B. How does the LEA/ESA ensure that resolution sessions occur within 15 days, or 7 if expedited, of the parent filing of a due process complaint unless the parties agree to waive or agree to mediation?
- C. How does the LEA/ESA ensure that it implements the resolution agreements consistent with 34 CFR §300.510?
- D. How does the LEA/ESA ensure the implementation of administrative law judge decisions, including addressing district-wide violations to ensure violations do not recur?
- E. How does the LEA/ESA ensure that it implements mediation decisions?

SCOPE OF REVIEW

Documentation and information obtained as a result of pre-visit and on-site review activities were examined, including:

- Systems Analysis Questionnaire
- Dispute Resolution databases (citizen complaint, due process and mediation) for July 1, 2014, through June 30, 2017.
- Dispute Resolution databases for July 1, 2017 through December 31, 2017
- Administrative interview with the Director

AREAS OF STRENGTH

- The district had three citizen complaints during the three years reviewed (one each in 2014, 2015, and 2017). Corrective actions were required in two of the three complaints that the district timely completed.
- The district had eight due process hearing requests between July 1, 2014, through June 30, 2017 and two hearing requests between July 1, 2017 through December 31, 2017. Of the ten total requests, seven were filed by parents and three were filed by the district. Resolution sessions were timely conducted in five of the parent requests and waived in two requests in lieu of mediation. Of the ten requests for a due process hearing, one was resolved between the district and parents (in 2017), three resulted in resolution agreements (two in 2016 and one in 2017), two were resolved through formal mediation agreements (one in 2016 and one in 2017), two were withdrawn (one in 2016 and one in 2017); and two proceeded to hearing (both had findings in favor of the district in 2016).
- There were 11 requests for mediation; five requests were made by the district and six were made by parents. Six requests resulted in mediation agreements, three requests were declined, and two requests could not be scheduled.
- During the on-site visit, the district provided written interoffice protocols regarding the communication, tracking, documentation, and analysis used by the district to timely implement corrective actions resulting from IDEA dispute resolution decisions and/or agreements, including the development of a systematic process to prevent recurrence.
- Based on a review of the dispute resolution databases, it does not appear as though any actions have been taken due to the district's inability to implement a dispute resolution finding, order, settlement, or agreement.

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REQUIRED ACTIONS <i>(see Appendix A – Required Actions Tracker)</i>	
<ul style="list-style-type: none"> • None 	
RECOMMENDATIONS FOR PROGRAM IMPROVEMENT	
<ul style="list-style-type: none"> • None 	
Interview Info.	Interview Summary:
<ul style="list-style-type: none"> • Administrative Interview 	March 28, 2018—Paul Vine, Director of Special Services
Related Requirements	
IDEA 2004 REQUIREMENTS: 34 CFR §300.151(b) [Resolving a complaint] 34 CFR §§300.152 - 153 [Complaint procedures and filing a complaint] 34 CFR §300.506 [Mediation] 34 CFR §300.510 [Resolution process] 34 CFR §300.514 [Finality of decision; appeal; impartial review] 34 CFR § 300.518 Child’s status during appeal 34 CFR §§ 300.600 through 300.608 [State enforcement]	WASHINGTON ADMINISTRATIVE CODE 392-172A-05030 Investigation of the complaint and decision 392-172A-05070 Resolution of a dispute through mediation 392-172A-05090 Resolution process 392-172A-05125 Student’s status during proceedings

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Critical Element IV: Monitoring Priority Areas: Does the LEA/ESA have in effect policies, procedures, and practices that are reasonably designed to improve educational results and functional outcomes for all students with disabilities, and are consistently implemented in accordance with state policies and procedures established in WAC 392-172A subject to state monitoring as described in WAC 392-172A-07010?

- A. How does the LEA/ESA ensure that all children ages 3–21, with suspected disabilities who reside within its jurisdiction and who may be eligible for special education services are identified, located, and evaluated in accordance with WAC 392-172A-02040?
- B. How does the LEA/ESA ensure that a student’s placement is individually determined, based on the student’s least restrictive environment, and enables the student to participate in the general education program to the maximum extent possible consistent with WAC 392-172A-02060?
- C. How does the LEA/ESA ensure that students eligible for special education services are not improperly excluded from school for disciplinary reasons and are provided services in accordance with WAC 392-172A-05145?
- D. Describe the LEA/ESA procedures for ensuring that children participating in early intervention services through Part C, and who will participate in preschool program services through Part B, experience a smooth and effective transition in accordance with WAC 392-172A-02080.
- E. How does the LEA/ESA ensure that students eligible for special education services who are or will be turning 16 years of age have measurable post-secondary goals in the areas of training, education, employment, and where appropriate, independent living skills based on age-appropriate assessments, including transition services and courses of study in accordance with WAC 392-172A-03090?
- F. How does the LEA/ESA ensure that assessments and other evaluation materials are selected and administered so as not to be discriminatory on a racial/cultural basis in accordance with WAC 392-172A-03020(3)(a)(i)?
- G. Is there clear guidance for consideration of cultural factors and the inclusion of parents in the eligibility and placement process (WAC 392-172A-06000(1) (a))?

SCOPE OF REVIEW

Documentation and information obtained as a result of pre-visit and on-site review activities were examined, including:

- The district’s Special Education Policy and Procedures
- The district’s Program Risk-Based Self-Assessment
- The district’s Documentation Checklist submissions
- The district’s Systems Analysis Questionnaire
- The results of the student record review
- Focus Groups held at school buildings
- Parent focus group
- The district’s Performance Data Profile for the past three years
- The district’s 2017 Special Education Students Suspended/Expelled report
- Interviews conducted with district administrators
- Service Provider Interviews at school buildings
- The district’s 2015–2016 WISM Final Report
- District-level Focus Groups and Work Sessions

Based on the information and data reviewed, the selected monitoring priority areas of focus for the Lake Washington School District include Least Restrictive Environment and Secondary Transition.

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LEAST RESTRICTIVE ENVIRONMENT:

AREAS OF STRENGTH

- The district met the state targets for Indicator B-5A (percent of students with IEPs aged 6 through 21 who spend 80-100% of the day in the regular class) and Indicator B-5B (percent of students with IEPs aged 6 through 21 who spend less than 40% of the day in the regular class) for the three-year period reviewed.
- The district submitted a description of the continuum of placement options offered for preschool students with disabilities, including services provided within Head Start and Ready Start programs, self-contained preschool programs, and supplemental programs for preschool students with Autism. The district also plans to pilot four integrated early childhood classrooms during the 2018–19 school year.
- All of the 98 IEPs reviewed documented individualized placement determinations that enabled the student to participate in the general education program to the maximum extent possible.

REQUIRED ACTIONS

(see Appendix A – Required Actions Tracker)

- None

RECOMMENDATIONS FOR PROGRAM IMPROVEMENT

- According to the district's Performance Data Profile, the district did not meet the 2017–18 targets for the percent of children with IEPs aged 3 through 5 who are receiving special education services in a regular early childhood program (Indicator B-6A: District 2.1%, Target >29.05%); or the percent of children with IEPs aged 3 through 5 who are attending a separate special education class (Indicator B-6B: District 59.9%, Target <38.0%).
- During the on-site visit, the district reported that IEP teams may not have fully implemented the practice of accounting for the child's participation in regular early childhood programs within the community. It is recommended that the district work with OSPI for technical assistance related to the implementation of this practice.
- The district is encouraged to continue to pursue options for preschool children with disabilities to receive services in settings alongside nondisabled peers. The district is encouraged to review OSPI's website for technical assistance resources related to Indicator B-6 Preschool LRE at <http://www.k12.wa.us/specialed/EarlyChildhood/PreschoolLRE.aspx> and Indicator B-7 Early Childhood Outcomes at <http://www.k12.wa.us/SpecialEd/ProgramReview/Monitoring/StudentPerformance.aspx#7>.

SECONDARY TRANSITION:

AREAS OF STRENGTH

- According to the district's Performance Data Profile, the district's data for Indicator B-1 (Graduation Rates) were above the state average for the three-year period reviewed. In addition, the district met the state targets for Indicator B-2 (Dropout Rates) and Indicator B-14 (Post-school Outcomes) for the same period.
- Staff at the Transition Academy, the district's program for students with disabilities aged 18 through 21, reported a 100% job placement

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rate for students graduating from the program.

- The record review included 27 files that contained secondary transition for students turning age 16 or beyond (or younger if the IEP team determined it was appropriate). Twenty-five of the 27 files reviewed for secondary transition (93%) contained all of the required transition components, including age-appropriate transition assessment information, measurable post-secondary goals, transition services including course(s) of study, and evidence the student was invited to participate in the transition IEP meeting. This represents improvement from the district's 2015–16 WISM review, which showed 76% compliance in this area.

REQUIRED ACTIONS

(see Appendix A – Required Actions Tracker)

- Two of the 27 files reviewed for secondary transition were missing one or more of the required transition elements. Correction of the student-specific non-compliance described on the IEP Review Forms for the identified files must be completed as soon as possible, but no later than the due date of the correction cycle (March 1, 2019).

RECOMMENDATIONS FOR PROGRAM IMPROVEMENT

- The district is encouraged to move forward with its plans to expand service options for students with disabilities aged 18 through 21.
- Technical assistance resources related to secondary transition can be found on OSPI's website at: <http://www.k12.wa.us/SpecialEd/ProgramReview/Monitoring/SecondaryTransition.aspx>.

DISPROPORTIONALITY:

REVIEWER NOTES

- Based on an analysis of the district's pre-visit documentation and other data, disproportionality was not selected as a monitoring priority area of focus. It was noted, based on preliminary data reviews, that Lake Washington School District could potentially be identified for significant disproportionality in the area of students identified as Hispanic who are eligible under the disability category of Specific Learning Disability (SLD) when the new significant disproportionality calculations go into effect in the 2019–20 school year.⁵ Technical assistance resources can be found on OSPI's website at:
 - Disproportionality: <http://www.k12.wa.us/SpecialEd/ProgramReview/Monitoring/Disproportionality.aspx>
 - Significant Disproportionality: <http://www.k12.wa.us/SpecialEd/programreview/Disproportionality.aspx>

Interview Information:	Interview Summary:
<ul style="list-style-type: none"> • Administrative Interview 	March 28, 2018—Paul Vine, Director of Special Services
<ul style="list-style-type: none"> • Service Provider Interviews 	March 28-29, 2018—Staff at Redmond High School, Redmond Middle School, Transition Academy, Community School, Kirk Elementary School, and Dickinson Elementary School

⁵ As communicated in OSPI's Special Education Bulletin 030-18 (<http://www.k12.wa.us/BulletinsMemos/Bulletins2018/B030-18.pdf>), Washington State is moving to a new calculation for the identification of significant disproportionality. As noted in the bulletin, if the U.S. Department of Education determines that it will not delay the implementation of the new significant disproportionality regulations, then the new calculations will be in effect for the 2018–19 school year.

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Related Requirements:	
IDEA 2004 REQUIREMENTS: 34 CFR §300.134 Child Find 34 CFR §300.114 – 300.120 Least Restrictive Environment 34 CFR §300.530 – 300.536 Discipline 34 CFR §300.646 Disproportionality	WASHINGTON ADMINISTRATIVE CODE: 392-172A-02040 Child Find 392-172A-02050-02070 Least Restrictive Environment 392-172A-05140-05175 Discipline Procedures 392-172A-07040 Significant Disproportionality

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Critical Element V – Individualized Education Program (1) Implementation: Based on the student records reviewed, does the LEA/ESA provide enrolled students eligible for special education, ages 3-21, a free appropriate public education (FAPE) consisting of individualized specially designed instruction and any necessary related services consistent with WAC 392-172A-02000 intended to improve educational results and functional outcomes to prepare students for college, career, and life? (2) Procedural: Does the LEA/ESA have policies and procedures that are consistently implemented to ensure the development and implementation of the IEP program? Do IEPs and evaluations contain the required components?

- A. How does the LEA/ESA ensure evaluations are sufficient in scope to develop an appropriate IEP and that IEPs and services are consistent with evaluation recommendations?
- B. Does the LEA/ESA ensure that students are receiving specially designed instruction and related services as reflected in the evaluation report and identified in the IEP at no cost to the parents?
- C. How does the LEA/ESA ensure that present levels of academic achievement and functional performance include evidence or data to support the student’s current level of functioning and that annual goals are written in measurable terms?
- D. Are evaluations and IEPs completed within the required timelines?
- E. Do IEPs indicate frequency, location, and duration of specially designed instruction, related services, modifications, and accommodations?

SCOPE OF REVIEW

Documentation and information obtained as a result of pre-visit and on-site activities were examined, including:

- 98 individual student records, including evaluations and Individualized Education Programs (IEPs)
- Interviews conducted with special education service providers from six school buildings
- Seven informal classroom observations conducted onsite at five school buildings (refer to Appendix C)
- Interviews conducted with district administrators
- Teacher and/or student class schedules for selected students
- The district’s Performance Data Profile for the past three years
- The district’s Systems Analysis Questionnaire
- Focus Groups and Work Sessions conducted during the on-site visit
- The district’s 2015–16 WISM Final Report

STUDENT LEVEL REVIEW SUMMARY

Table 1. Critical Element V – Student Level Non-Compliance Summary		N = 98 Student Records
Primary Review Element	Files with Identified Non-Compliance	
A1. Evaluation sufficiency	File 85	
C2. IEP Procedural Components – Measurable annual goals	Files 3, 8, 9, 12, 19, 25, 39, 42, 44, 45, 50, 51, 53, 55, 57, 62, 70, 78, 80, 81, 82, 83, 88, and 95	

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C3. IEP Procedural Components – Other related requirements	File 80
D1. Timelines – Evaluations	File 26
E1. IEP Summary of Services – Frequency, location, and duration	Files 45, 57, 75, and 90
E2. IEP Summary of Services – Other related requirements	Files 5 and 25

AREAS OF STRENGTH

- All of the IEPs reviewed identified services that were consistent with the recommendations identified in the evaluation report.
- All of the students reviewed were found to be receiving specially designed instruction and related services in the areas identified in the IEP.
- In all of the IEPs reviewed, the present levels of academic achievement and functional performance contained information to support the student’s current level of functioning.
- All of the IEPs reviewed were completed within the required timelines (i.e., 30 calendar days from initial eligibility and annual IEP within one year of the prior IEP).
- The district has demonstrated substantial compliance on Indicator B-11 (Timely Initial Evaluations) by being at 100% for the past three years for this indicator.
- The district conducts internal reviews of evaluations and IEPs in order to ensure that evaluations are sufficient in scope and IEPs contain the required elements.
- District staff have received training in the evaluation of students with disabilities, interventions, behavior supports, de-escalation, curriculum, instructional technology, diversity, decreasing the achievement gap, data collection, secondary transition, writing instruction, and age-appropriate transition assessments.
- The district demonstrated improvement in several compliance areas since its 2015–16 WISM review, including present levels of performance (90% compliant in 2015–16 to 100% compliant in 2017–18) and measurable annual goals (62% to 76% compliant).

REQUIRED ACTIONS

(see Appendix A – Required Actions Tracker)

- One file contained an evaluation that was insufficient in scope to confirm the student’s disability, the adverse educational impact of the disability, and the student’s need for special education and related services.
- Twenty-four IEPs contained one or more goals that were not measurable (i.e., they did not have a quantified baseline, target, and/or unit of measure).
- One IEP was missing some or all of the required information related to statewide assessments and accommodations.
- Four IEPs reviewed did not identify the frequency, location, and duration for each of the special education and related service areas the student was receiving.
- Two of the students who were the subject of a service provider interview were receiving services that were inconsistent with the frequency, location, and duration of services identified in the IEP.

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- Correction of the student-specific non-compliance identified above (and described on the Evaluation Review Forms and IEP Review Forms for the identified files) must be completed as soon as possible, but no later than the due date of the correction cycle (March 1, 2019).

RECOMMENDATIONS FOR PROGRAM IMPROVEMENT

- Approximately 15 of the files reviewed contained one or more revisions to the current evaluation report that were completed using a process that appeared unclear and confusing to the reviewers. The district is encouraged to consider using the Assessment Revision forms and process that are part of the district’s IEP system (IEP.Online) in order to be more transparent when changes are being made to a student’s current evaluation.
- Twelve of the 27 student progress reports reviewed did not include actual information/data as stated in the goal about the student's progress toward the annual goals. The district is encouraged to review and disseminate the progress reporting tip from the April 2017 Special Education Monthly Update (beginning on page 2 of the following link: <http://www.k12.wa.us/SpecialEd/monthlyupdates/April2017Updates.pdf>).
- The following resources may be helpful to staff conducting internal reviews of IEPs and evaluations:
 - Evaluation and IEP Technical Assistance Module found on OSPI’s website at: <http://www.k12.wa.us/SpecialEd/ResourceLibrary/Eval-IEP-Module/default.aspx>.
 - Special Education Consistency Index course found on the eLearning for Educators (a Washington State Needs Project) website at: <http://www.evergreen.edu/elearningforeducators>.

Interview Information		Interview Summary:	
• Administrative Interview		March 28, 2018—Paul Vine, Director of Special Services	
• Service Provider Interviews		March 28-29, 2018—Staff at Redmond High School, Redmond Middle School, Transition Academy, Community School, Kirk Elementary School, and Dickinson Elementary School	
Related Requirements			
IDEA 2004 REQUIREMENTS: 34 CFR §300.101- 103 FAPE 34 CFR §300.301- 311 Eligibility and Timelines 34 CFR §300.320- 324 Individualized Education Programs		WASHINGTON ADMINISTRATIVE CODE 392-172A-02000 - 02045 FAPE Requirements 392-172A-03090 - 03115 Individualized Education Programs 392-172A-03005 - 03080 Evaluations and Reevaluations	