

<b>Request</b>	DSE Internal Audit Corrective Action Plan Progress Report	<b>Submitted by:</b>	Chelsea Montgomery, Assistant Superintendent, Student Services Emmaundia Ford, Executive Director, Special Education Anne Dirden, Director, Special Education
<b>Date</b>	August 8, 2024		

No	Observation	Management Responses (Action Items)	Progress & Documentation	Owner	1st Semester Update	2nd Semester Update
1	District and State policies and procedures were not followed in documenting the identification and referral of students into the Special Education program via reporting. Specifically, Responses to Intervention Reports, Initial Referral Checklists, and Problem Identification Checklists were not completed for some students. In addition, the use of these documents is not standardized across the district.	<p><b>Management Response #1:</b> Training: The MTSS team will standardize the required forms and develop SOPs for processes. The teams will include the forms and SOPs in the beginning of year training for MTSS contacts. Monitoring: MTSS Coordinators (5) will sample 3-5 cases per month for required files. A record of these reviews will be centrally maintained and reviewed by Student Services Leadership.</p> <p><b>Implementation Date:</b> August 1, 2024, and on-going</p> <p><b>Responsible for Implementing Recommendation:</b> Student Services Leadership to include Assistant Superintendent Student Services and Executive Director of Special Education</p>	<p><b>Training Date:</b> July 29, 2024</p> <p><b>Agenda Topics:</b> MTSS Department Goals; DSE Internal Audit Results; Next Steps; and MTSS Procedural Overview</p> <p><b>Participants:</b> MTSS Contacts</p> <p><b>Attendance:</b> Initial Training 66 Required 75 Attended</p> <p>Make-up Training: August 12, 2024 8 Required</p>	Student Services	Completed ▾	Completed ▾

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2	Interventions are not being monitored as part of the SST plan in alignment with District policy. Weekly progress monitoring for interventions and monthly SST intervention meetings were not documented for students.	<p><b>Management Response #2:</b> We are currently soliciting for a progress monitoring tool for reading, math, and behavior at tier 2, 3, and for special education goals. We are planning for this tool to be on the August board meeting agenda. If approved, we will complete integration and training in August and implementation starting in September. This tool will allow for standardization across support structures and provide us with quick, normed, and sensitive to growth data to make the best real-time instructional decision to close achievement gaps.</p> <p>Training: All MTSS Contacts and Special Education Case Managers will be trained on the expectations of progress monitoring in August and the tool in September.</p> <p>Monitoring: MTSS and Special Ed Coordinators will sample 3-5 cases per month for required files. A record of these reviews will be centrally maintained and reviewed by Student Services Leadership.</p>	<p><b>Training Date:</b> July 29, 2024</p> <p><b>Agenda Topics:</b> MTSS Department Goals; DSE Internal Audit Results; Next Steps; MTSS Procedural Overview</p> <p><b>Participants:</b> MTSS Contacts</p> <p><b>Attendance:</b> Initial Training 66 Required 75 Attended</p> <p>Make-up Training: August 12, 2024 Attendance: 8 Required</p>	Student Services	In Progress ▾	In Progress ▾

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		<b>Implementation Date:</b> August, September, and on-going <b>Responsible for Implementing Recommendation:</b> Student Services Leadership including MTSS and Special Ed Coordinators				
3	<p>APS policy and State regulations require parental consent to perform an evaluation. Some evaluations were performed without retention of written parental consent. In addition, documentation did not verify that SST teams included all necessary team members. Documentation also did not verify that all IEP team members attended the IEP meetings or include documentation of parent agreement to excuse the missing team members.</p>	<p><b>Management Response #3:</b>            Training: All Special Ed Lead and School Psychologists will be trained on the expectation for parental consent for evaluation, required IEP team members and required documentation.            Monitoring: Special Ed Coordinators (5+) will sample 3-5 cases per month for required files. A record of these reviews will be centrally maintained and reviewed by Student Services Leadership.</p> <p><b>Implementation Date:</b> August 1, 2024, and on-going  <b>Responsible for Implementing Recommendation:</b> Executive Director of Special Education and Director Psychological Services</p>	<p><b>Training Date:</b> July 29, 2024</p> <p><b>Agenda Topics:</b> Cross Functional Training (DSE Internal Audit Results; MTSS Process, Child Find, Initial Referral Meetings; Speech Referrals; Private/Outside Evaluations; Meetings with Advocates and Attorneys; Evaluation Procedures and Compliance; Required Team Members; Responsibilities; Parental Consent; and Documentation)</p> <p><b>Participants:</b> MTSS Contacts; School Psychologists; Special Education Lead Teachers; Occupational Therapists;</p>	<p><b>Student Services/DEE</b></p>	<p><b>Completed -</b></p> <p>Training completed as scheduled. November 2024, case managers/SELTs are required to utilize “Get Ready” IEP Checklist for all initial and annual IEP meetings.</p>	<p><b>Completed -</b></p>

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			Speech Therapists; and Physical Therapists  <b>Attendance:</b> Initial Training 304 Required 356 Attended  Make-up Training: Online 6 Required 6 Attended			
4	Completion of required milestones throughout the evaluation and IEP process are not completed in compliance with District policies and State regulations.	<b>Management Response #4:</b> Develop: Process to document late evaluations in GO-IEP. Training: All Special Education Lead Teachers, School Psychologists, Speech Language Therapists, Occupational Therapy will be re-trained on timelines and documentation. <b>Monitoring:</b> <ul style="list-style-type: none"> <li>Documentation for Late Timeline Notification form developed</li> <li>Case Manager and SELT receive notification to complete form for update/correction</li> </ul>	<b>Revised Process for Excusals and Reporting</b> <b>Late Evaluation:</b> July 25, 2024 <b>Training Date:</b> July 29, 2024  <b>Agenda Topics:</b> Cross Functional Training (DSE Internal Audit Results; MTSS Process, Child Find, Initial Referral Meetings; Speech Referrals; Private/Outside Evaluations; Meetings with Advocates and Attorneys; Evaluation Procedures & Compliance; Required Team Members;	<b>Student Services/ DEE</b>	<b>Completed ▾</b>  Training was completed as planned. September 2024, data collection was moved to the Cognito platform to and shifted to align with GaDoE Quality IEP Review Rubric	<b>Completed ▾</b>  Data from audit reviews were analyzed and used to prescribe training for SELTs during monthly SELT meetings

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		<ul style="list-style-type: none"> <li>Coordinators provide weekly feedback/follow-up as necessary</li> <li>Coordinators will sample initial 2-3 GOIEP files for eligibility determination completion within state guidance.</li> <li>Data will be housed in Cognito Platform.</li> </ul> <p><b>Implementation Date:</b> July 29, 2024, and on-going  <b>Responsible for Implementing Recommendation:</b> Special Education Executive Director and Director Psychological Services</p>	Responsibilities; Parental Consent; and Documentation) <b>Participants:</b> MTSS Contacts; School Psychologists; Special Education Lead Teachers; Occupational Therapists; Speech Therapists; and Physical Therapists  <b>Attendance:</b> Initial Training 304 Required 356 Attended  Make-up Training: Online 6 Required 6 Attended			
5	APS transitioned into a new record keeping system, GO-IEP in 2023. There is documentation that was not transferred from the predecessor system to GO-IEP. Additionally, GO-IEP is not utilized as the primary form of	<p><b>Management Response #5:</b>                      Training: Special Education Lead Teachers and Case Managers will attend required training on the expectations of the use of GO-IEP for all special education processes and documentation. This required training will include what must be recorded in the IC Contact Log and GOIEP.  <b>Monitoring:</b></p>	<p><b>Training Date:</b> October 2, 2024   <b>Agenda Topics:</b> DSE Internal Audit; First 90 Days; Mandatory Record Keeping; Go-IEP; Coteaching/SDI, Medicaid; Legal Requests; Transition Plans; Options for Consideration; Required IEP Team Meetings; and</p>	DEE	<p><b>Completed -</b>                       Training was completed. November 2024, “Get Ready” IEP Meeting checklist were implemented for all initial</p>	<p><b>Completed -</b>                       January 2025, School/Program Coordinators sample suit initial IEPs looking initiated 11/1/24 and after for “Get Ready” checklist</p>

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	document retention across all schools, and it is not being updated appropriately.	<ul style="list-style-type: none"> <li>Develop a “Get Ready” IEP Meeting checklist, Case Managers Attest all documents are present</li> <li>Coordinators will sample 3-5 cases per month for: <ul style="list-style-type: none"> <li>Required special education documents in GOIEP</li> <li>Notification to case managers of feedback and next steps will be provided via Cognito</li> </ul> </li> </ul> <p><b>Implementation Date:</b> August 1, 2024, November 1, 2024, and on-going</p> <p><b>Responsible for Implementing Recommendation:</b> Special Education Leadership to include Executive Director and Director</p>	<p>Manifestation Determination Review Meetings.</p> <p><b>Participants:</b> Special Education Lead Teachers</p> <p><b>Attendance:</b> Initial Training 98 Required Attended</p> <p>Make-up Training: November, 2024</p>		and annual IEPs meetings	attestation and other required documentation and reported provided to SELT and Principal
6	Training for MTSS and special education department faculty does not address several key components of the District policy, such as items related to the SST process,	<p><b>Management Response #6:</b> We will review the existing training materials and make sure the 7 areas noted are included prior to the August 2024 training.</p> <p><b>Implementation Date:</b> July 29, 2024</p>	<p><b>Training Date:</b> July 30, 2024</p> <p><b>Agenda Topics:</b> Cross Functional Training (DSE Internal Audit Results: MTSS Process, Child Find, Initial Referral Meetings; Speech Referrals;</p>	DEE	Completed ▾	Completed ▾  Some trainings have been repeated based on the time on SELT request or monthly audit review, i.e. Child

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	S.M.A.R.T goal development, and comprehensive evaluations.	<b>Responsible for Implementing Recommendation:</b> Special Education Executive Director and Director	Private/Outside Evaluations; Meetings with Advocates and Attorneys; Evaluation Procedures & Compliance; Required Team Members; Responsibilities; Parental Consent; and Documentation) <b>Participants:</b> MTSS Contacts; School Psychologists; Special Education Lead Teachers; Occupational Therapists; Speech Therapists; and Physical Therapists  <b>Attendance:</b> Initial Training 304 Required 356 Attended  Make-up Training: Online 6 Required 6 Attended			<b>Find, Required Team Members</b>
7	Attending training sessions related to the identification, referral, evaluation, and placement of students in the Special	<b>Management Response #7:</b> Required training for cross-functional teams will be conducted at the beginning of the year. Required training	<b>Training Date:</b> July 30, 2024  <b>Agenda Topics:</b> Cross Functional Training (DSE Internal Audit Results;	<b>Student Services/ DEE</b>	<b>In Progress ▾</b>	<b>In Progress ▾</b>

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	Education program is not required per District policy. Additionally, there is an absence of cross-functional training between the MTSS, Special Education, and Psychology Services departments.	<p>will also be held for MTSS Contacts, Special Education Lead Teachers, and new SELTs training monthly. SELTs and their evaluators will receive a monthly to-do list and coordinating reports with an optional meeting/training session each month on the 7 topics outlined by the Audit.</p> <p><b>Implementation Date:</b> August 1, 2024, and on-going</p> <p><b>Responsible for Implementing Recommendation:</b> Special Education Executive Director and Director</p>	<p>MTSS Process, Child Find, Initial Referral Meeting; Speech Referrals; Private/Outside Evaluations; Meetings with Advocates and Attorneys; Evaluation Procedures &amp; Compliance; Required Team Members; Responsibilities; Parental Consent; Documentation)</p> <p><b>Participants:</b> MTSS Contacts; School Psychologists; Special Education Lead Teachers; Occupational Therapists; Speech Therapists; and Physical Therapists</p> <p><b>Attendance:</b> Initial Training 304 Required 356 Attended</p> <p>Make-up Training: Online 6 Required 6 Attended</p>			
8	Certain District policies and procedures pertaining to special education	<b>Management Response #8:</b> Policies and procedures areas for revision will be reviewed and/or revised to bring clarity to work in	<b>In progress</b> <b>Current Revisions to Special Education/MTSS Procedures and Manual:</b>	DEE	In Progress ▾	In Progress ▾



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	identification, referral, evaluation, and IEP development employ language that lacks precision, which may lead to misinterpretation of policy.	<p>our schools in alignment with best practices and allowing for flexibility of individual needs of the students.</p> <p><b>Monitoring:</b></p> <ul style="list-style-type: none"> <li>• Review chapters monthly to identify unclear language.</li> <li>• Utilize guide for creating additional chapters.</li> <li>• Invite SELTs to review for ambiguity and clarity.</li> </ul> <p><b>Implementation Date:</b> August 2024 – May 2025</p> <p><b>Responsible for Implementing Recommendation:</b> Student Services Executive Director Special Education and Director Special Education</p>	<ul style="list-style-type: none"> <li>• Free Appropriate Public Education</li> <li>• Individualized Education Plan</li> <li>• Discipline</li> <li>• SST</li> <li>• Evaluation &amp; Reevaluations</li> </ul>			