

**2016-17 Exceptional Student Education
On-Site Monitoring Report**

**Franklin County School District
October 17-19, 2016**



This publication is produced through the Bureau of Exceptional Education and Student Services (BEES), Division of K-12 Public Schools, Florida Department of Education (FDOE), and is available online at <http://www.fldoe.org/ese/mon-home.asp>. For information on available resources, contact the BEES Resource and Information Center (BRIC).

BRIC website: <http://www.fldoe.org/ese/clerhome.asp>

Bureau website: <http://www.fldoe.org/ese/>

Email: BRIC@fldoe.org

Telephone: 850-245-0475

Fax: 850-245-0987



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**Florida Department of Education
Bureau of Exceptional Education and Student Services**

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Authority

The Florida Department of Education (FDOE), Bureau of Exceptional Education and Student Services (BEESS), in carrying out its roles of leadership, resource allocation, technical assistance, monitoring and evaluation, is required to oversee the performance of district school boards in the enforcement of all exceptional student education (ESE) laws (sections 1001.03(3), 1003.571 and 1008.32, Florida Statutes [F.S.]) and rules. One purpose of the Individuals with Disabilities Education Act (IDEA) is to assess and ensure the effectiveness of efforts to educate children with disabilities (s. 300.1(d) of Title 34, Code of Federal Regulations [CFR]). BEESS is responsible for ensuring that the requirements of IDEA and the educational requirements of the state are implemented (34 CFR §300.149(a)(1) and (2)).

In fulfilling this requirement, BEESS monitors ESE programs provided by district school boards in accordance with ss. 1001.42, 1003.57 and 1003.573, F.S. Through these monitoring activities, BEESS examines records and ESE services, evaluates procedures, provides information and assistance to school districts, and otherwise assists school districts in operating effectively and efficiently. The monitoring system is designed to facilitate improved educational outcomes for students while ensuring compliance with applicable federal laws and regulations and state statutes and rules.

Under 34 CFR §300.646(b)(2), if a state identifies significant disproportionality based on race or ethnicity in a local educational agency (LEA) with respect to the identification of children as children with disabilities, the identification of children in specific disability categories, the placement of children with disabilities in particular educational settings or the taking of disciplinary actions, the LEA must use the maximum amount (15 percent) of funds allowable for comprehensive coordinated early intervening services (CEIS) for children in the LEA who are not currently identified as needing special education or related services, but who need additional academic or behavioral supports in order to succeed in a general education environment. These children should include particularly, but not exclusively, children in those groups that were significantly over-identified.

Section 1003.573, F.S., Use of restraint and seclusion on students with disabilities, establishes documentation, reporting and monitoring requirements for districts regarding the use of restraint and seclusion on students with disabilities. It also requires districts to have policies and procedures in place that govern parent notification, incident reporting, data collection and monitoring the use of restraint or seclusion for students with disabilities. As required, the FDOE has established district- and school-based standards for documenting, reporting and monitoring the use of restraint and seclusion. These standards are included in each district's Exceptional Student Education Policies and Procedures document.

ESE On-Site Monitoring Process

Background Information

The 2016-17 ESE On-Site Monitoring process focuses on those State Performance Plan (SPP) indicators that contributed to the targeting of school districts for CEIS and the following indicators that affect equity and access in the educational environment for students with disabilities:

- Indicator 1 – Graduation: Percentage of youth with individual educational plans (IEPs) graduating from high school with a regular diploma.

- Indicator 2 – Dropout: Percentage of youth with IEPs dropping out of high school.
- Indicator 4 – Rates of suspension and expulsion:
 - A. Percentage of districts that have a significant discrepancy in the rates of suspensions and expulsions of more than 10 days in a school year for children with IEPs.
 - B. Percentage of districts that have (a) a significant discrepancy, by race or ethnicity, in the rate of suspensions and expulsions of more than 10 days for children with IEPs; and (b) policies, procedures or practices that contribute to the significant discrepancy and do not comply with requirements relating to the development and implementation of IEPs, the use of positive behavioral interventions and support, and procedural safeguards.
- Indicator 5 – Educational environments:
Percentage of children with IEPs aged 6 through 21:
 - A. In the regular class 80 percent or more of the day;
 - B. In the regular class less than 40 percent of the day; and
 - C. In separate schools, residential facilities or homebound/hospital placements.
- Indicator 10 – Disproportionality, specific disability categories: Percentage of districts with disproportionate representation of racial and ethnic groups in specific disability categories that is the result of inappropriate identification.
- CEIS – Services provided to students in kindergarten through Grade 12 (with a particular emphasis on students in kindergarten through Grade 3) who are not currently identified as needing special education or related services, but who need additional academic and behavioral supports to succeed in a general education environment.
- Restraint – Rate of incidents of restraint, as reported on the FDOE website.
- Seclusion – Rate of incidents of seclusion, as reported on the FDOE website.

The ESE On-Site Monitoring process includes four phases:

- Phase 1 is composed of planning activities that occur in advance of the initial on-site visit to the school district.
- Phase 2 is the initial on-site visit to the selected school district by the state support team (SST).
- Phase 3 is follow-up activities, which are conducted by a designated follow-up team, as determined by the SST, and identification of the ongoing data that will be collected.
- Phase 4 is evaluation of the effectiveness of how the district is addressing each of the focus areas, and should include participation of the action-planning and problem-solving process team.

In a letter dated September 19, 2016, the superintendent of the Franklin County School District was informed that BEESS would be conducting an on-site monitoring visit for the following focus areas: graduation rate, transition IEPs aligned with postsecondary outcomes, and concerns regarding valid and reliable data and critical audit findings.

School Selection

Upon review of the school district's data, it was determined that the on-site monitoring process would involve Franklin County School, prekindergarten through Grade 12, for administrator, teacher, parent, and student focus groups and school walk-through debriefings.

On-Site Activities

On-Site Visit Team

The following SST members planned or conducted the on-site monitoring visit:

FDOE, BEESS

- Monica Verra-Tirado, State Director for Special Education, Bureau Chief
- Sean Freeman, Program Specialist, Program Accountability Assessment and Data Systems, Lead
- Karlene Bonin, Program Specialist, Dispute Resolution and Monitoring
- Mary Walsh, Program Specialist, Instructional Support Services

FDOE, BEESS Discretionary Projects

- Ann Selland, Facilitator, Problem Solving: Response to Intervention (PS:RtI)
- Janna Hill, Project Manager, Multiagency Network for Students with Emotional/Behavioral Disabilities (SEDNET)
- Faye Yongue, Program Coordinator, Florida Diagnostic and Learning Resources System Associate Centers (FDLRS)
- Rusty Holmes, Consultant, FDLRS
- Tury Lewis, Regional Transition Representative, Project 10: Transition Education Network

Data Collection

On-site monitoring activities included the following:

- Review of recent data
- Welcome session with district- and school-level staff – 11 participants
- Valid and reliable data focus group – two participants
- Critical audit findings focus group – three participants
- Administrator focus group – six participants
- Teacher focus group – three participants
- Parent focus group – zero participants (parents were invited to participate but were unable to attend)
- Student focus group – eight participants
- School walk-through debriefings – three classrooms
- Action-planning and problem-solving process – 16 participants

The district completed the Best Practices for Inclusive Education assessment with Florida Inclusion Network (FIN) facilitators on March 1, 2014, and included the following goals:

- Goal 1: Franklin County School District will increase proficiency for students with disabilities in reading and math by at least five percent annually through the use of a multi-tiered system of supports (MTSS) in the least-restrictive environment (LRE).
- Goal 2: FIN will provide initial and follow-up professional development. Technical assistance activities will target flexible scheduling and collaborative teaching service delivery models, which will be based on district needs assessments to decrease separate class placement to seven percent.
- Goal 3: FIN will support a model of job-embedded technical assistance and coaching to support best practices to increase effective instruction and assessment in inclusive settings.

- Goal 4: FIN will provide information and resources to district leaders to support families in understanding research-based inclusive educational practices and strategies to support their child's learning.

2016-17 ESE On-Site Monitoring Results

The following data are related to the focus areas and activities for the 2016-17 ESE On-Site Monitoring for the Franklin County School District.

Graduation Rate

The federal uniform high school graduation rate for students with disabilities is calculated by taking the number of first-time ninth graders from four years ago, plus the number of incoming transfer students on the same schedule to graduate, minus the number of students from this population who transferred out or left to enroll in a private school or home education, divided by the number of standard diplomas from the same group. Subsequent to the on-site visit, the district's federal graduation rate for students with disabilities for the 2014-15 school year was 34.8 percent, which was below the state target of 56.3 percent. At the time of this report, the 2015-16 graduation rate had increased to 64.3 percent, which is above the state target of 58.3 percent.

	2013-14	2014-15	2015-16
Franklin	78.6%	34.8%	64.3%
State Target	54.3%	56.3%	58.3%

Transition Individual Educational Plans Aligned with Postsecondary Outcomes

Each year districts are required to complete web-based protocols on the BEESS General Supervision website. Correction of noncompliance and corrective action plans are reported by districts and tracked via the website. One of the required protocols is SPP 13: Secondary Transition for Students with Disabilities (Age 16), which is comprised of 16 standards. The last standard (T16-16) includes all the requirements for a transition IEP to be compliant.

During the 2013-14 self-assessment process, 40 percent of the student records entered by the district had findings of noncompliance for standard T16-16, and during the 2014-15 self-assessment process, 20 percent of the student records entered by the district had findings of noncompliance for standard T16-16. The 2015-16 self-assessment results identified no findings of noncompliance for standard T16-16.

	2013-14	2014-15	2015-16
Percentage of Noncompliance for Standard T16-16	40%	20%	0%

Valid and Reliable Data

During the 2015-16 school year, the district did not submit valid, reliable and timely data for students receiving services funded by CEIS. CEIS funds are set aside from the IDEA program budget to address issues concerning disproportionate identification, discipline and placement of

students with disabilities of a particular race when compared to all other ethnic groups combined.

The district's data submission for the 2014-15 school year incorrectly identified 66 students as having been served with CEIS funds; however, for this specific school year, the district did not reserve funds for CEIS purposes and did not provide services to students in this capacity.

Critical Audit Findings

During the 2014-15 fiscal year, the district did not spend sufficient state or local funds to meet their maintenance of effort (MOE) for students with disabilities resulting in an audit finding of \$58,531 in questionable costs. As a result of this audit finding, the district's finance staff has been working with FDOE's Office of Audit Resolution and Monitoring to establish written protocols to monitor the district's MOE and reimburse the IDEA Part B grant the total amount of questionable costs. Prior to the on-site visit, FDOE approved the district's written protocols to monitor the district's MOE.

Interviews Conducted

Valid and Reliable Data Focus Group

Members of the SST conducted a focus group at the district office with the ESE director and the MTSS interventionist regarding valid and reliable data.

Comments from the focus group included the following:

- The LEA requested additional support to resolve the student CEIS data issue. While on site, BEESS staff provided the ESE director with the location of CEIS data, which differs from the ESE student records. The ESE director was able to locate the CEIS funds source data and resolve the issue.
- In regard to the decrease in the 2014-15 graduation data, the district indicated that there was a misconception by school personnel that guiding students to the GED[®] option would not affect the district's federal uniform graduation rate.
- The ESE director conducts validation reviews to determine the accuracy of the data prior to submission to FDOE.

Critical Audit Findings Focus Group

Members of the SST conducted a focus group at the district office with the ESE director, the district director of financial services and the district MTSS interventionist regarding critical audit findings.

Comments from the focus group included the following:

- The district worked with the FDOE Office of Audit Resolution and Monitoring to develop fiscal protocols to monitor the district's required MOE.
- The fiscal staff utilizes student full-time equivalent (FTE) and staff salary information to compare the current level of MOE with the district's projected budget.
- If changes in FTE data or staff salaries are not meeting the projected budget, then the ESE Department and the Department of Financial Services are able to make changes to the number of personnel paid from local efforts to ensure the district is able to meet its budgetary forecast.

- The district maintains documentation, including student FTE data and salary projections, to demonstrate it has followed its protocols.
- The director of financial services is the only individual who reviews the MOE calculation.
- The district conducts monthly meetings between finance and ESE program staff to review MOE and IDEA expenditures.

Administrator Focus Group

Members of the SST conducted a focus group with administrators from Franklin County School regarding the graduation rate.

Themes that emerged from the administrator focus group included the following:

- There has been a change in school leadership with a new principal and new assistant principal.
- Additional supports and programs for students with disabilities to increase the school's graduation rate were discussed, which included the following:
 - The “Navigator” program through Gulf Coast State College, helps students plan postsecondary goals and earn college credits.
 - The “I Believe in You” program, which encourages and motivates students to graduate through character development.
 - The “Hopes and Dreams” program, which involves a new ESE specialist that meets with all high school students with disabilities and helps them understand that someone is interested in their success and is following their progress. The ESE specialist meets with students individually to discuss their academic and postsecondary goals.
 - Programs in engineering, biomedical, robotics, renewable energy, greenhouses, aquaponics labs and welding certification are being planned.
- Teachers receive information on a regular basis regarding students who are earning grades of D and F. This information is used to initiate conversations with students and parents in an effort to provide updates regarding missing assignments, behavior and attendance.
- Students who are not performing well on the Florida Standards Assessment (FSA) are provided the option of taking two English language arts classes instead of an elective to boost their performance on the FSA.
- The school utilizes a “Success Center” in the computer lab to aid students in credit recovery.
- The guidance counselor provides incoming freshman with a map of the four-year graduation plan.
- The district provides an after school tutoring program for students taking the American College Test and the Scholastic Aptitude Test.
- The district is partnering with Franklin’s Promise and the Conservation Corps to provide certifications in forestry. As part of this program, students who dropped out have the option to re-enroll to obtain their high school diploma.
- When students with disabilities, who have previously been served in a more restrictive environment, enter high school, they are served in an inclusive setting. It is recognized that students need support in the classroom during this transition.

Teacher Focus Group

Members of the SST conducted a focus group with teachers from Franklin County School regarding the graduation rate.

Themes that emerged from the teacher focus group included the following:

- Teachers are passionate and enthusiastic about the education and success of their students.
- Teachers in the new school, built in 2007, feel isolated from the community. Previously, the district had two separate community schools, one in Apalachicola and one in Carrabelle; the new school is now located between these communities, making it more difficult for parent involvement.
- The school-generated progress report is used to communicate with students and parents regarding missing assignments, behavior and attendance, and to track progress toward graduation.
- The new ESE specialist provides extra support to students and teachers.
- The school has a designated liaison to assist families with social issues and to provide support for graduation to students who are homeless.

Student Focus Group

Members of the SST conducted a focus group with students in Grades 8-11 from Franklin County School regarding graduation, dropout and postschool activities.

Comments from the student focus group included the following:

- All students recognize the importance of graduation.
- A few students feel that math is an obstacle that could prevent them from graduating.
- The students' parents actively encourage them to graduate, stressing the importance of a high school diploma to expand their opportunities for employment in their local economy.
- Students want to continue their education in postsecondary institutions, either in college or a technical school. Students' goals include certification or degrees in culinary arts, cosmetology, medical school, nursing and athletics.
- The Advancement Via Individual Determination (AVID) program, which is designed to assist students in developing organizational and communication skills necessary for academic success, is helpful.
- Students recognize that out-of-school suspension is not a break from school as students are required to complete assignments while suspended.
- Students want the school to better organize and communicate the available programs to assist students with achieving their academic goals.
- Most students could not recall having attended their IEP team meetings. Many students were unable to state what accommodations were on their IEPs.

School Walk-Through Debriefings

Members of the SST conducted school walk-through debriefings at Franklin County School regarding student engagement, school climate, and evidence of academic and behavioral expectations.

Observations from the school walk-through debriefings included the following:

- The classrooms were orderly and conducive to learning.
- In one classroom, the teacher was engaged in teaching calming strategies, including deep breathing exercises.
- One classroom provided visuals on the use of Cornell notes associated with the AVID program.
- The hallways between classrooms displayed posters on postsecondary opportunities and

- on-line college-credit programs.
- Posters celebrating student success and inspirational quotes were displayed on the walls throughout the school.

Commendations

1. The district’s 2014-15 federal dropout rate for students with disabilities decreased by 12 percent from the previous year.
2. The district’s 2015-16 LRE rate for regular class placement is 83 percent, which is higher than the state rate of 73 percent.

2016-17 Next Steps

Graduation Rate	
Summary	Subsequent to the on-site visit, the district’s federal graduation rate for students with disabilities for the 2014-15 school year was 34.8 percent, which was below the state target of 56.3 percent. At the time of this report, the 2015-16 graduation rate had increased to 64.3 percent, which is above the state target of 58.3 percent.
Recommendations	<p>The district should consider:</p> <ul style="list-style-type: none"> • Increasing opportunities for communication with students and parents regarding school programs available to students. • Providing Quality IEP training to increase teacher knowledge and skill in drafting IEPs. FDLRS is available to provide this training. • Collaborating with Project 10 to continue development of the district’s early warning system (EWS) and integrating the various programs and initiatives into a cohesive system of student options and supports toward graduation, such as Franklin’s Promise, Navigator and I Believe in You.
Required Actions	<p>By February 21, 2017, the district must provide the district’s BEESS liaison with a districtwide report on its EWS for graduation. This report must contain the following details:</p> <ul style="list-style-type: none"> • A thorough narrative or flowchart describing the EWS from start to finish, including available mentoring programs. • How the district will ensure fidelity of the implementation of the EWS. • The resources and personnel available to carry out the duties related to the implementation of the EWS. • How the district will provide a plan for truancy and alternatives to suspension. • A list of all district programs available to students, such as the Success Centers and Navigator, and how the district guides students to these programs. • Which discretionary projects, e.g., FIN, FDLRS and Project 10, the district intends to utilize to increase professional development to teachers and staff. <p>By May 31, 2017, the district must provide the district’s BEESS liaison with an assessment of the above-mentioned EWS. The assessment</p>

	<p>must contain the following details:</p> <ul style="list-style-type: none"> • The system's successes, which include data analysis. • Areas in need of improvement or revision. • How the district determined the fidelity of the EWS and how well teachers, staff, students and parents responded to it. • The district's plans for future use of the EWS.
Valid and Reliable Data	
Summary	The district submitted inaccurate data regarding the number of students served with CEIS funds. During the visit, the LEA was able to resolve the issue and demonstrate that they have a process to review data prior to submitting it to FDOE.
Recommendations	Continue reviewing ESE student data in order to ensure the accuracy of the data submissions prior to the submission due dates. Implement a review of the Federal and State Indicator Funds Source file to ensure the district is able to accurately capture which students are or are not served with CEIS funds.
Required Actions	None
Critical Audit Findings	
Summary	The district did not meet the 2014-15 MOE requirement.
Recommendations	Continue the monthly meetings between the financial and program offices to ensure the proper monitoring of MOE and IDEA expenditures. Provide additional personnel to review MOE calculations as an additional check to ensure the accuracy of the calculations.
Required Actions	None.
Transition IEPs Aligned with Postsecondary Outcomes	
Summary	During the 2013-14 self-assessment process, 40 percent of the student records entered by the district had findings of noncompliance for standard T16-16, and during the 2014-15 self-assessment process, 20 percent of the student records entered by the district had findings of noncompliance for standard T16-16. The 2015-16 self-assessment results identified no findings of noncompliance for standard T16-16.
Recommendations	Prior to the submission of student records for self-assessment, the district should review the IEPs for compliance for transition goals and ensure that postsecondary outcomes (SPP 13) are included. If noncompliance is found, the district should provide training to designated staff responsible.
Required Actions	None.
Phase 4 of the ESE On-Site Monitoring Process	
Summary	<p>The Franklin County School District was selected for an on-site visit for the following focus areas related to students with disabilities:</p> <ul style="list-style-type: none"> • Graduation rate • Transition IEPs aligned with postsecondary outcomes • Valid and reliable data

	<ul style="list-style-type: none">• Critical audit findings
Required Actions	By May 31, 2017 , designated BEESS staff and members of the problem-solving team that met on day three of the visit (October 19, 2016), will reconvene via a conference call to share how they are addressing each of the above-mentioned focus areas and determine next steps. The district will coordinate with BEESS regarding the date and time of the conference call and provide documentation (e.g., recent data, professional development, problem-solving notes, action plans) to BEESS by May 17, 2017 .

Technical Assistance

1. **Implementing a Multi-Tiered System of Support for Behavior: Recommended Practices for School and District Leaders** (Florida's PBIS Project) may be accessed at http://flpbs.fmhi.usf.edu/pdfs/RTIB%20Guide%20101811_final.pdf and provides an overview of the critical components of an MTSS for behavior. These critical components describe systems changes that are necessary for a results-driven ESE system.
2. The district's **ESE Policies and Procedures** document provides district- and school-based standards for documenting, reporting and monitoring the use of manual, physical, or mechanical restraint and seclusion developed by FDOE. The school district's document for the 2013-14 through 2015-16 school years may be accessed at <http://beess.fcim.org/sppDistrictDocSearch.aspx>.
3. The technical assistance paper entitled, "**Guidelines for the Use, Documentation, Reporting, and Monitoring of Restraint and Seclusion with Students with Disabilities**," dated October 14, 2011, may be accessed at <https://info.fldoe.org/docushare/dsweb/Get/Document-6212/dps-2011-165.pdf>. This document provides guidance regarding the use, documenting, reporting, and monitoring of restraint and seclusion of students with disabilities in school districts, including (a) when restraint or seclusion might be used, (b) considerations when selecting a training program for restraint, (c) what should be documented, (d) parent notification and reporting, and (e) monitoring use. It also contains information about s. 1003.573, F.S., Use of restraint and seclusion on students with disabilities.
4. The United States Department of Education, in collaboration with the United States Department of Justice, released **School Discipline Guidance** in the January 2014, Volume 4, Issue 1 of the **Office of Special Education Programs Monthly Update**. This package will assist states, districts and schools in developing practices and strategies to enhance school climate, and ensure those policies and practices comply with federal law. The resource documents listed below are included in the package, and are available at <http://www.ed.gov/school-discipline>.
 - **Dear Colleague** guidance letter on civil rights and discipline;
 - **Guiding Principles** document, which draws from emerging research and best practice;
 - **Directory of Federal School Climate and Discipline Resources**, which indexes federal technical assistance and other resources; and
 - **Compendium of School Discipline Laws and Regulations**, which catalogs state laws and regulations related to school discipline.
5. **Functional Behavioral Assessment and Positive Intervention Benchmarks of Effective Practice** (Florida's PBIS Project) may be accessed at http://flpbs.fmhi.usf.edu/pdfs/pbs_FBA_Benchmarks.pdf.
6. **PS:Rtl Technology** may be accessed at <http://www.floridarti.usf.edu/index.html>. One function of this project provides support to regional technology coordinators and technology specialists to effectively implement accessible instructional materials, assistive technologies, learning technologies, and universal design for learning principles within all tiers of instruction. This project also manages, coordinates and supports the regional assistive technology loan libraries.

7. **SEDNET** may be accessed at <http://www.sednetfl.info/>. The 19 regional SEDNET centers assist Florida school districts and relevant stakeholders in building capacity to provide the necessary mental health and academic supports to students with or at-risk of emotional/behavioral disabilities to prepare students to achieve academic success; graduate high school; and become career, college and life ready.

State Support Team for Franklin County School District

Bureau of Exceptional Education and Student Services

325 West Gaines Street
Suite 614, Turlington Building
Tallahassee, Florida 32399
850-245-0475
<http://www.fldoe.org/ese>

Monica Verra-Tirado
Bureau Chief
BEESS
monica.verra-tirado@fldoe.org

Sean Freeman
Program Specialist
Program Accountability Assessment
and Data Systems
sean.freeman@fldoe.org

Karlene Bonin
Program Specialist
Dispute Resolution and Monitoring
karlene.bonin@fldoe.org

Mary Walsh
Program Specialist
Instructional Support Services
mary.walsh@fldoe.org

BEESS Discretionary Projects

Ann Selland
Problem-Solving Facilitator
PS:Rtl
ann.selland@fldoe.org

Janna Hill
Project Manager
SEDNET
janna.hill@lcsb.org

Faye Yonge
Project Coordinator
FDLRS
yonguef@paec.org

Rusty Holmes
Consultant
FDLRS
rusty.holmes@paec.org

Tury Lewis
Regional Transition Representative
Project 10: Transition Education Network
tlewis@usfsp.edu



Pam Stewart, Commissioner
313230A