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DEC 13 2004

Ms. Sharon Wells
Education Program Specialist
U. S. Department of the Interior
Bureau of Indian Affairs
Office of Indian Education Programs
1849 C St., NW, Room 3512, MIB
Washington, DC 20240

Dear Ms. Wells:

This **Final Audit Report** (ED-OIG/A06-E0010) presents the results of our audit of the Individuals with Disabilities Education Act (IDEA), Part B requirements at Turtle Mountain Community High School (Turtle Mountain High School) for the period July 1, 2001, through September 30, 2003. Our objective was to determine whether Turtle Mountain High School administered IDEA, Part B funds in accordance with requirements, laws and regulations, and provided services to eligible children in accordance with each student's Individualized Education Program (IEP).

We provided a draft of this report to the Bureau of Indian Affairs (BIA), Office of Indian Education Programs. In its response to our draft report, BIA officials generally agreed with our recommendations. We have summarized BIA's comments in the body of the report and have included the response as an Attachment to this report.

BACKGROUND

The Department of Education (Department) provides funding from major program grants to the Bureau of Indian Affairs (BIA), an agency within the Department of the Interior. The BIA allocates these funds to elementary and secondary schools operated or funded by the Secretary of the Interior, including tribally operated schools that are funded by the BIA. These grants support students with disabilities and disadvantaged children. The Department provided $140 million (22 percent) of BIA's school operating funds in 2002. The program funds from the Department have constituted an increasing share of these schools' operating budgets since fiscal year (FY) 1999 (from 18.2 percent to 22 percent in fiscal year 2002). This is due in part to large increases

since 1999 in two major Department programs under which BIA receives funds--IDEA, Part B and Elementary and Secondary Education Act, Title I (Title I). At BIA funded schools, funds for students with disabilities under IDEA increased by 50 percent, and Title I funds for disadvantaged students increased by 21 percent for fiscal years 1999 through 2002. As the IDEA, Part B appropriation increased, IDEA, Part B funds provided to the Secretary of the Interior have been capped in the FY 2002, 2003, and 2004 appropriation language at the prior year's funding level, plus inflation.

IDEA, Part B requires the Department to provide funds to the Secretary of the Interior to assist in providing special education and related services to children with disabilities. From the amount appropriated for any fiscal year, the Department shall reserve 1.226 percent to provide assistance to the Secretary of the Interior, of which 80 percent is allotted for serving children ages 5 through 21 with disabilities enrolled in elementary and secondary schools for Indian children operated or funded by the Secretary of the Interior. The Secretary of the Interior is required to submit information to the Department that it meets the requirements of IDEA. In addition, the Secretary of the Interior will provide several assurances, including an assurance that the Department of the Interior will cooperate with the Department in its exercise of monitoring and oversight requirements.

BIA funded schools are to use 15 percent of the Indian School Equalization Program (ISEP) formula funds generated by their base instructional administration to fund their special education programs. ISEP funds constitute the largest amount of the Department of the Interior funds used for school-level administration, such as principals' salaries and administrative assistance, in addition to salaries for teachers, teacher aides, and the cost of materials. If the 15 percent is not sufficient to fund the services needed by all eligible ISEP students with disabilities, then the school may apply for IDEA, Part B funds. Schools must demonstrate need when applying for these funds.

Turtle Mountain High School is located in Belcourt, North Dakota, and is part of the Turtle Mountain Band of Chippewa. The BIA disbursed $1,064,770 of IDEA, Part B funds to Turtle Mountain High School for our two-year audit period as follows—

School Year 2001-2002	$ 492,400
School Year 2002-2003	$ 572,370
Total	$1,064,770

For the 2001-2002 school year, Turtle Mountain High School had an enrollment of 592 students with 146 classified as disabled; and in the 2002-2003 school year, enrollment was 591 students with 151 classified as disabled. The average amount of IDEA, Part B funds per pupil was $3,373 in the 2001-2002 school year and $3,791 in the 2002-2003 school year.

AUDIT RESULTS

Turtle Mountain High School was unable to demonstrate that it provided the planned special education and related services to 94 percent of the students in our sample in accordance with their IEP.

According to 34 C.F.R. § 300.341(a)(1)(2), The [Secretary of the Interior][1] shall ensure that each public agency develops and implements an IEP for each eligible child with a disability served by that agency. The IEP must contain certain elements according to 34 C.F.R. § 300.347, including—

> (a)(3) A statement of the special education and related services and supplementary aids and services to be provided to the child . . .
>
> (a)(7)(ii)(A) A statement of how the child's parents will be regularly informed (through such means as periodic report cards), at least as often as parents are informed of their nondisabled children's progress, of . . . Their child's progress toward the annual goals.

Further, 34 C.F.R. § 300.350(a)(1) requires that each public agency must provide special education and related services to a child with a disability in accordance with the child's IEP.

An IEP has several elements, including the child's present level of educational performance, the annual goals and objectives, as well as the direct special education and related services that will be provided to help meet those goals and objectives. The IEP must include a statement of how the parents will be informed of the child's progress, including the extent to which the progress is sufficient to enable the child to achieve the annual goals. However, the progress reports provided to parents do not address the frequency and duration of the services being provided. The frequency and duration of actual services provided should be documented in teachers' attendance records.

Concerning the need to document special education services provided, OMB Circular A-87, *Cost Principles for State, Local, and Indian Tribal Governments, Attachment A, Paragraph C.1* (1997) provides that—

> To be allowable under Federal awards, costs must . . . Be necessary and reasonable for proper and efficient performance and administration of Federal awards . . . Be allocable to Federal awards . . . Be adequately documented.

To determine if Turtle Mountain High School was providing the required services and documenting those services, we selected a random sample of 16 of 146 students with disabilities in school year 2001-2002 and 15 of 151 students in school year 2002-2003. We found that Turtle Mountain High School did not provide any services to 4 of the 31 students

[1] The regulations specifically refer to the SEA (State Educational Agency). However, 34 C.F.R. § 300.267 requires the Secretary of the Interior to comply with specific sections of 34 C.F.R. Part 300, including 34 C.F.R. § 300.341.

in our sample; and, due to a lack of documentation we could not determine what services, if any, were provided to 25 other students. Additionally, Turtle Mountain High School did not develop the required progress reports informing the parents of their child's progress as specified in the student's IEP for 8 of the 31 students.

We concluded these conditions occurred because school officials did not have procedures in place to (1) ensure special education and related services were provided in accordance with the student's IEP, (2) ensure that parents are informed of their child's progress as specified in the student's IEP, and (3) document that special education and related services were provided to all students with disabilities in accordance with their IEPs.

As a result of the 94 percent error rate (29 of 31 files reviewed), Turtle Mountain High School was unable to document that it provided the required special education services for the students with disabilities during our two-year audit period. The high error rate and lack of documentation indicates that Turtle Mountain High School has a management system that does not meet the management standards set forth in the regulations. The regulations at 34 C.F.R. § 80.12(a) state that a grantee may be considered "high risk" if an awarding agency determines that a grantee—

(1) Has a history of unsatisfactory performance, or
(2) Is not financially stable, or
(3) Has a management system which does not meet the management standards set forth in this part, or
(4) Has not conformed to terms and conditions of previous awards, or
(5) Is otherwise not responsible; and if the awarding agency determines that an award will be made, special conditions and/or restrictions shall correspond to the high risk condition and shall be included in the award.

RECOMMENDATIONS

We recommend that the Assistant Secretary for Special Education and Rehabilitative Services instruct the Bureau of Indian Affairs to—

1. Obtain assurance from Turtle Mountain High School officials that the $1,064,770 of IDEA, Part B funds was used to deliver the educational assistance proposed in each of the IEPs for the 297 children with disabilities.

2. Instruct Turtle Mountain High School to document all special education and related services provided to each current student with disabilities and develop a progress report to inform parents of their child's progress.

3. Submit a corrective action plan, which includes strategies, benchmarks, proposed evidence of change, targets and timelines, to ensure the noncompliance identified in this audit is corrected.

We also recommend that the Assistant Secretary for Special Education and Rehabilitative Services—

4. Evaluate the corrective action plan submitted and determine whether the action proposed will correct the noncompliance identified in this audit.

5. Monitor the corrective action taken and determine if it was effective. If the corrective action was not effective, determine whether Turtle Mountain High School should be designated as a high-risk grantee.

BIA'S COMMENTS TO THE DRAFT REPORT

BIA agreed to implement our recommendations. BIA stated, "Generally, there is agreement with the proposed recommendations in your letter." BIA will obtain a written assurance from Turtle Mountain High School that IDEA funds were used to provide services to 297 students with disabilities. Special education teachers will document progress of students with disabilities and maintain attendance records documenting frequency and duration of services provided. BIA also proposed a corrective action plan that included strategies, benchmarks, timelines to ensure the noncompliance(s) identified in the draft report was corrected.

OIG'S RESPONSE

We reviewed the BIA response to the draft report and the corrective action plan. We believe the proposed corrective actions will address the issue of documenting services provided to children with disabilities.

OBJECTIVE, SCOPE, AND METHODOLOGY

Our objective was to determine whether Turtle Mountain High School administered IDEA, Part B funds in accordance with requirements, laws and regulations[2], and provided services to eligible children in accordance with each student's IEP.

To accomplish our objective, we—

- Reviewed the financial statement and compliance report for the year ended June 30, 2002;
- Reviewed Turtle Mountain High School's Special Education application and budget;

[2] Code of Federal Regulations 34 Parts 300 to 399, revised as of July 1, 2002.

- Reviewed detailed expense reports and payroll information regarding IDEA, Part B expenditures. We compared the information to budget information and performed reasonableness tests on the information provided;
- Reviewed the Master Student Roster – for the 2001-2002 and 2002-2003 school years;
- Reviewed Turtle Mountain High School's Education – Organization Chart and Special Education Staff roster;
- Randomly selected and reviewed at least 10 percent (30) of the files for students requiring special education services. We examined the files for IEPs, progress reports, and a list of services to be provided. We then compared the list of services to supporting documentation (i.e. teacher attendance books, special education providers' attendance books, and other relevant documentation); and,
- Interviewed various Turtle Mountain High School employees, Belcourt Public School District officials, and Department of the Interior/BIA officials in Albuquerque, New Mexico, and Belcourt, North Dakota.

We relied upon the computerized student roster lists provided by Turtle Mountain High School officials for selecting our sample. We tested the student roster lists for accuracy and completeness by comparing selected source records to the roster list. Based on this test, we concluded the student roster list was sufficiently reliable to be used for the sample population.

We conducted our fieldwork at Turtle Mountain High School in Belcourt, North Dakota, on March 9 - 17, 2004. We discussed the results of our audit with Turtle Mountain High School officials on March 17, 2004. An exit conference was held with BIA officials on April 27, 2004.

Our audit was performed in accordance with generally accepted government auditing standards appropriate to the scope of audit described above.

STATEMENT ON INTERNAL CONTROLS

As part of our review, we assessed Turtle Mountain High School's system of internal controls, policies, and procedures applicable to providing special education services to children with disabilities. Because of inherent limitations, a study and evaluation made for the limited purposes described above would not necessarily disclose all material weaknesses in the internal controls. However, our review identified that Turtle Mountain High School needs to improve its internal controls related to documenting special education and related services provided to children with disabilities in accordance with each child's IEP. Those weaknesses and their effects are discussed in the AUDIT RESULTS section of this report.

ADMINISTRATIVE MATTERS

Statements that managerial practices need improvements, as well as other conclusions and recommendations in this report represent the opinions of the Office of Inspector General. Determinations of corrective action to be taken will be made by the appropriate Department of Education officials.

If you have any additional comments or information that you believe may have a bearing on the resolution of this audit, you should send them directly to the following Education Department officials, who will consider them before taking final Departmental action on the audit:

Troy Justesen, Ed.D.
Acting Assistant Secretary
Office of Special Education and Rehabilitative Services
U.S. Department of Education
Federal Building No. 6, Room 3W315
400 Maryland Avenue, SW
Washington, DC 20202

It is the policy of the U.S. Department of Education to expedite the resolution of audits by initiating timely action on the findings and recommendations contained therein. Therefore, receipt of your comments within 30 days would be greatly appreciated.

In accordance with Freedom of Information Act (5 U.S.C §552), reports issued by the Office of Inspector General are available, if requested; to members of the press and general public to the extent information contained therein is not subject to exemptions in the Act.

Sincerely,

/s/
Sherri L. Demmel
Regional Inspector General
for Audit

Attachment

Attachment

United States Department of the Interior

BUREAU OF INDIAN AFFAIRS
Washington, D.C. 20240

IN REPLY REFER TO:

NOV 3 | 2004

Sherri L. Demmel
Regional Inspector General for Audit
U.S. Department of Education
Office of Inspector General
1999 Bryan Street, Suite 2630
Dallas, Texas 75201-6817

Dear Ms. Demmel:

This letter is written in response to the results of the Office of Inspector General audit of the Individuals with Disabilities Education Act (IDEA), Part B requirements at Turtle Mountain High School for the period July 1, 2001, through September 30, 2003. As stated in your letter, the objective was to determine whether Turtle Mountain High School administered IDEA, Part B funds in accordance with requirements, laws and regulations, and whether they provided services to eligible children in accordance with the student's Individualized Education Program (IEP).

Generally, there is agreement with the proposed recommendations of your letter. Specifically, our response is outlined below:

1. **Draft Audit Report Recommendation**: Obtain assurance from Turtle Mountain High School officials that the $1,064,770 of IDEA, Part B funds was used to deliver the educational assistance proposed in each of the IEPs for the 297 children with disabilities.

   Response: A written assurance from Turtle Mountain High School will be obtained through the Grant Officer/Education Line Officer, indicating that IDEA funds were used to provide services to the 297 students with disabilities during SY 01-02 and SY 02-03 in accordance to each student's IEP. In addition, Turtle Mountain High School submitted the IDEA (Part B) budget to the Turtle Mountain Agency as part of their annual Consolidated School Reform Plan Application amendment for SY 01-02 and SY 02-03. This budget provides information as to how Part B money was used for that two-year period and is filed at the agency and the Center for School Improvement. In addition, a detailed expenditure report for those two years is kept at the school's budget office.

2. **Draft Audit Report Recommendation:** Instruct Turtle Mountain High School to document all special education and related services provided to each current student with disabilities and develop a progress report to inform parents of their child's progress.

   Response: The Turtle Mountain Agency will continue to validate services through the Indian School Equalization Program (ISEP) count process conducted in October 2004 and each October thereafter. This is conducted using a checklist completed on 100% of

the students in the school's special education program. (See Attachment A) The Second Tier monitoring review occurs between January-April of each year involves a more extensive checklist and is done on 10% of the students. (See Attachment B) Each year a new group of student files are reviewed in order to gather more quantitative data. As part of the IEP, Turtle Mountain High School uses Form 21D to document how the parents are informed of the progress of their children (See Attachment C) The progress report, Form 23, is customarily sent to parents simultaneously when report cards are mailed out. (See Attachment D). Form 27 of the IEP is a Contact Log which identifies any contact made with parents, including progress of the students. (See Attachment E).
In addition, the Turtle Mountain Education Line office will conduct random on-site validation visits for attendance and progress documentation. Turtle Mountain High School will finalize their special education policies and procedures to ensure all services are provided, including informing parents of their child's progress as specified in the student's IEP.

3. **Draft Audit Report Recommendation:** Submit a corrective action plan, which includes strategies, benchmarks, proposed evidence of change, targets and timelines, to ensure the noncompliance identified in this audit is corrected.

   Response: See Attachment F.

Thank you for allowing this office the opportunity to respond to the audit. If you should have questions, please contact Gloria Yepa at 505-248-7541.

Sincerely,

for Edward Parisian
Director, Office of Indian Education Programs

Enclosures

Attachment A

Attachment

Office of Indian Education Programs

ISEP Special Education Certification

School Year _____

School _____ Reviewer _____ Date _____

Student/Grade	Disability Category.	Current Date on IEP.	Hours of Service Stated on IEP and Verified by Lesson Plan(s) and/or Special Education Attendance Roster.	Permission for Placement – Parental or Guardian Signatures.	Present Level of Education Performance, Annual Goals, Benchmarkers/Objectives & Progress Reports.	Transition Planning 14 years +.	Verified Pareprofessional Consultation with Special Education Teachers for Students Participating in Inclusion.	Appropriate Certification of Teachers and Assessment Team members.
1.								
2.								
3.								
4.								
6.								
7.								
8.								
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10.								
11.								
12.								
13.								
14.								
15.								
16.								
17.								
18.								
19.								
20.								
21.								
23.								
24.								

Check (√) Indicates Missing Item.

Attachment T 5 Attachment

Agency [redacted] **Monitor** [redacted] **Date Monitored** 07/09/2004

School System [redacted] **Teacher** [redacted]

Student [redacted] **DOB** 03-05-1987 **Age** 17 **Grade** 12

Disability Specific Learning Disability **Primary Language in Home** English

Student Status New File

KEY: Y = Yes N = No T = Transfer
NA = Not Applicable O = Old (Activity that happen 3 or more years in the past.)

Directions: Select the acronym, defined above, that best describes each compliance concern. Explain an "N" in the comment section by selecting the proposed responses or defining your own using "Edit" or "Other".

1. GENERAL REQUIREMENT

a. File in secure location. (300.572)
Comment:

b. Access log is included in file and completed correctly. (300.563)
Comment:

2. Evaluation Procedures

a. Prereferral interventions completed prior to referral to special education. Date:
(300.563)
Comment:

b. Referral form included in file. Date: (BIA Eligibility Document)
Comment:

c. Information gathered regarding student participation and progress in the general education curriculum. (300.343)
Comment:

d. Evaluation procedures related to the referral and prior interventions. (300.533)
Comment:

e. Evidence of asking students age 14 years and older their needs, preferences and interests. (300.344)
Comment:

f. Consent for initial evaluation in writing and in the file. Date: .505)
Comment:

Attachment

Student [redacted] **Teacher:** [redacted] **Date:** 07/09/2004

g. Variety of evaluation tools and strategies used to gather relevant, functional & developmental information. (300.532) Comment:	
h. Tests are not biased in terms of race, gender, culture, or socioeconomic status. (300.532) Comment:	
i. Evaluation conducted in native language or other mode of communication where appropriate. (300.532) Comment:	
j. Student evaluated in all areas of suspected disability. (300.532) Comment:	
k. Current evaluation was conducted by a team of professionals, including parental input. (300.532 & 535) Comment:	
l. Current evaluation is less than three years old. DATE: 43) Comment:	
m. Most recent three-year evaluation/review was held within required timeline. (300.343) Comment:	
n. Consent for Reevaluation in file if team determines reevaluation is necessary. DATE: (300.536) Comment:	
o. Continued eligibility documented if team determines that a reevaluation is not required to document the students continued eligibility for special education services. (300.533) Comment:	
3. Eligibility a. Evaluation Report completed and in the file. DATE: 42) Comment:	
b. Eligibility determination documented & in file. DATE:) (Evaluation Report and Eligibility determination may be the same document.) Comment:	
c. Determination by multidisciplinary team, including parent. (300.543) Comment:	
d. All eligibility criteria documented. (300.530 & 543) Comment:	

Attachment

Student [redacted] **Teacher:** [redacted] **Date:** 07/09/2004

e. Student exited when eligibility team determines that student is no longer eligible for services. (300.320)
Comment:

f. Section 504 is used as another service option for children with disabilities. (BIA Eligibility Document)
Comment:

g. Copy of report given to parent(s). (300.534)
Comment:

4. INDIVIDUALIZED EDUCATION PROGRAM (IEP)

a. Current IEP in student's file. DATE: 342)
Comment:

b. Initial IEP development date within 30 days of eligibility determination. (300.343)
Comment:

c. Current IEP is less than one year (365 days) old. (300.342)
Comment:

d. IEP implementation date is defined on the IEP. (300.382)
Comment:

5. Appropriate participants included on the IEP team: (300.344)

a. Parent(s) (300.344)

b. School administrator who is qualified to provide or supervise the provision of specially designed instruction, who is knowledgeable about the general education curriculum, and who is knowledgeable about the availability of resources (can commit school funds). (300.344 & 540))

c. Special education teacher. (300.344)

d. General education teacher(s). (300.344)

e. Individual who can interpret test results and instructional implications. (300.540)

f. Student (must be invited if 14 or older). (300.344)

g. Representative of private school or a representative (300.401 & 344)

Comment:

6. IEP content: (300.346 & 347)

a. Statement of present levels of educational performance, including how disability affects involvement and progress in general education curriculum. (300.347)

Comment:

Attachment

Student [redacted] **Teacher:** [redacted] **Date:** 07/09/2004

b. Measurable annual goals. (300.347) Comment:	
c. Goals are challenging, reflect high expectation and yet attainable. (300.347) Comment:	
d. Two or more short-term objectives/benchmarks for each goal. (300.347) Comment:	
e. A statement of how the child's parent(s) will be regularly informed on their child's progress toward the goals, and the extent to which that progress is sufficient to enable the child to achieve the goals by the end of the year. (300.347) Comment:	
f. Consideration of extended school year services. (300.309) Comment:	
g. Consideration of assistive technology needs. (300.346) Comment:	
h. Consideration, if appropriate, of LEP needs, monitoring hearing aids, and/or use of Braille. (300.346) Comment:	
i. Consideration of behavior intervention needs. (300.346) Comment:	
j. If required, positive behavioral supports are appropriate to reduce suspension/expulsion. (300.346) Comment:	
k. A statement of individual modifications in the administration, state, or school wide assessment, or why the assessment is not appropriate and how the student will be assessed. (300.347) Comment:	
l. An explanation of the extent, if any, to which the child will not participate with non disabled peers in the general education classroom, general education curriculum, extracurricular, and/or other nonacademic activities. (300.347) Comment:	
m. A listing of each special education and related services indicating amount of time, start date and duration. (300.347) Comment:	

Student [redacted] **Teacher:** [redacted] **Date:** 07/09/2004

n. A listing of accommodations, modifications, and support in general and special education. (300.347)

Comment:

o. IEP focuses on improving academic skills and educational performance. (300.347)

Comment:

7. Statement of transition service needs beginning at age 14:

a. At age 14, a course of study is defined. (300.347)

Comment:

b. At age 16, a statement of interagency responsibilities or any need linkages. (300.347)

Comment:

c. Representatives from other agencies are invited and attend the transition meeting (age 16+). (300.344)

Comment:

d. Not later than their 17th birthday, an explanation that rights will transfer to the student at age 18. (300.347)

Comment:

e. Graduation requirements addressed. (300.347)

Comment:

f. Students age 14 and older are being prepared to successfully transition to work, independent living, or additional education services that facilitate successful transition from school to work or from school to post-secondary education. (300.347)

Comment:

8. Documentation of alternative methods of gaining input from participants not in attendance, where appropriate:

a. Parent(s). (300.345)

Comment:

b. Transition-age student. (300.345)

Comment:

c. Agency representative(s) responsible for providing preschool or secondary transition services. (300.345)

Comment:

d. Private school representative(s).

Comment:

Student [redacted] **Teacher:** [redacted] **Date:** 07/09/2004

9. Placement and Services:

a. Parental Consent for Placement included in file. DATE: ;05)

Comment:

b. All services defined on the IEP are provided and promote a high quality education. (300.142)

Comment:

10. Invitation (300.345)

a. Parent informed of purpose, time location and attendees of formal meetings. (300.345)

Comment:

b. Invitation includes information regarding the parents' rights to bring other people to the meeting. (300.345)

Comment:

c. Invitation meets secondary transition requirement. (300.347 & 348)

Comment:

d. Current Procedural Safeguards brochure provided along with invitation to meeting. (300.343 & 533)

Comment:

e. Documentation of attempts to arrange a mutually agreed upon time and place for the meeting. (300.345)

Comment:

11. WRITTEN NOTICE Provided:

a. For the initial assessment. (300.503)

Comment:

b. Prior to implementation of IEP. (300.503)

Comment:

c. Prior to a change in an IEP. (300.503)

Comment:

d. Prior to a change in placement, which includes graduation. (300.503)

Comment:

e. Following the reevaluation determination and continued eligibility for services. (300.503)

Comment:

f. All Written Notices answer the five questions required by IDEA. (300.503)

Comment:

Attachment C

Attachment

STUDENT: _____ DOB: _____ DATE: _____

PRESENT LEVELS OF EDUCATIONAL PERFORMANCE- Describe in PLAIN TERMS: (a) What the student can and CANNOT DO compared to the same grade peers, (b) how the child's disability affects involvement and progress in the general education curriculum, (c) as appropriate, performance on any general school-wide assessment programs, and (d) parental concerns.

Parents will be informed of progress: _____ **Method:** _____

ANNUAL GOAL (Linked to PLEP, **MEASURABLE** & reasonably accomplished within 12 months.) **Goal Code**

Annual Goal# _____

EXTENDED SCHOOL YEAR ○ Yes ○ No ○ Postponed until (Initial IEP only) Complete ESY form to make determination.

SHORT TERM OBJECTIVES or BENCHMARKS (Minimum of 2)
(If STO's are used each objective must have a Behavior, Condition & Criteria.)

#1

Evaluation Procedures: | Positions Responsible:

#2

Evaluation Procedures: | Positions Responsible:

#3

Evaluation Procedures: | Positions Responsible:

#4

Evaluation Procedures: | Positions Responsible:

Attachment D

Attachment

IEP DATE: _____

EXCEPTIONAL EDUCATION PROGRESS REPORT

ctions: Update and provide to parents with report cards.

UDENT: _____ DOB: _____ DATE: _____

Goal Progress:

1= This goal has been met.
2= Progress has been made toward the goal. It appears that the goal will be met by the annual review date.
3= Progress has been made toward the goal but the goal may not be met by the time the annual review date.
4= Progress is not sufficient to meet this goal by the annual review date. An IEP amendment is required.
5= Your child did not work on this goal during this reporting period. (Provide an explanation to the parents.)

Annual Goal # _____ Define goal in space provided. | Goal Code

Report 1: Date: _____ Goal Progress: ○1 ○2 ○3 ○4 ○5
Comment:

Report 2: Date: _____ Goal Progress: ○1 ○2 ○3 ○4 ○5
Comment:

Report 3: Date: _____ Goal Progress: ○1 ○2 ○3 ○4 ○5
Comment:

Report 4: Date: _____ Goal Progress: ○1 ○2 ○3 ○4 ○5
nment:

Report 5: Date: _____ Goal Progress: ○1 ○2 ○3 ○4 ○5
Comment:

Report 6: Date: _____ Goal Progress: ○1 ○2 ○3 ○4 ○5
Comment:

Report 7: Date: _____ Goal Progress: ○1 ○2 ○3 ○4 ○5
Comment:

At the end of the IEP goal period, answer the following questions.

Progress: Is the child making progress expected by the IEP team?
- ☐ Goal met
- ☐ Goal not met, but performance improved
- ☐ No change or poorer performance
- ☐ Insufficient data for decision making

Independence: Is the child more independent in goal area?
- ☐ Greater independence
- ☐ Unchanged independence
- ☐ Less independence
- ☐ Insufficient data for decision making

Comparison to peers or standard: How does the child's performance compare with general education peers or standards?
- ☐ Comparison to age or grade level peers or standards not appropriate
- ☐ Less discrepancy from peers or standard
- ☐ Same discrepancy from peers or standard
- ☐ More discrepancy from peers or standard
- ☐ Insufficient data for decision making

Goal Status: Will work in the goal area be continued or discontinued?

Discontinue goal area:
- ☐ Success, no further education needs in goal area
- ☐ Goal area is not a priority for the next year
- ☐ Limited progress, plateau

Continue goal area:
- ☐ More advance work in goal area
- ☐ Continue as written

Attachment E

Attachment

Exceptional Education Contact Log

ent Name: ______________________

Parent/Guardian Name: Daytime Phone: ______

Date: ______ **Person Contacted:** **Purpose of Contact:**
Meeting Notice: ☐ Meeting Date ☐ Meeting Time ☐ Meeting Location ☐ Person(s) Attending
Comments:

Date: ______ **Person Contacted:** **Purpose of Contact:**
Meeting Notice: ☐ Meeting Date ☐ Meeting Time ☐ Meeting Location ☐ Person(s) Attending
Comments:

Date: ______ **Person Contacted:** **Purpose of Contact:**
Meeting Notice: ☐ Meeting Date ☐ Meeting Time ☐ Meeting Location ☐ Person(s) Attending
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ATTACHMENT F
TURTLE MOUNTAIN ELEMENTARY AND MIDDLE SCHOOLS
CORRECTIVE ACTION PLAN FOR 2004-2005

Objective	*Strategies*	*Benchmarks/ Evidence of Change*	*Timeline*
School will have progress reports in 100% of student files with evidence to show that parents have received them as evidenced through scheduled and random visits from the Turtle Mountain Education Line Office staff.	**(1) Special education teachers will use required forms to document progress of students with disabilities; (2) Special education teachers will use required forms to document contact made with parents to inform them of their child's progress. (3) the school will distribute a survey to parents of all students with disabilities on the effectiveness of the program.**	**(1) ISEP validation of all special education files and (2) Second Tier monitoring done between Jan. and April of each year, both conducted by agency staff; on-site visits from the agency to verify progress notes were sent to parents of all children with disabilities. (3) School special education coordinator will collect and verify parent surveys for agency validation.**	**(1) ISEP by October 22, 2004; (2)Second Tier results due by April 2005; quarterly (3) June 2005**
School will provide documentation in 100% of their student files showing services have been provided to students with disabilities as verified through scheduled and random visits from the Turtle Mountain Education Line Office.	**(1) Special education teachers will use required forms to document progress of students with disabilities therefore indicating service was provided; (2) Special education teachers will maintain attendance records documenting frequency and duration of services provided to students with disabilities.**	**(1) ISEP validation of all special education files and Second Tier monitoring done between Jan. and April of each year, both conducted by agency staff; (2) School special education coordinator will verify attendance records for agency on-site validation visits.**	**(1) ISEP by October 22, 2004; Second Tier results due by April 2005; (2) quarterly**
School will finalize their Special Education Policies & Procedures Manual to include a statement of how and when parents are notified of their child's progress.	**(1) Turtle Mountain elementary and middle school special education staff will meet to update their policies and procedures manual; (2) The P&P will be presented to school board for approval and signature.**	**The updated policies and procedures manual will be available on-site at the school, and kept on file at the Turtle Mountain Education line office and the Center for School Improvement.**	**December 20, 2004** **May 2005**

Attachment