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Exceptional Student Education Program

Evergreen Report Follow-up Review

November 16, 2015

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BACKGROUND

In April 2013, the District contracted with Evergreen Solutions, LLC to conduct an evaluation of its Exceptional Student Education (ESE) program and services. The comprehensive evaluation included an analysis of program effectiveness in supporting positive outcomes for students receiving special education and gifted services. The results, 34 commendations and 58 recommendations were presented to the School Board on October 17, 2013.

Since that time, the ESE department has been tracking the status of the district's responses to the recommendations.

OBJECTIVE, SCOPE & METHODOLOGY

OBJECTIVE:

The objective of this audit was to review management's actions and the status of the 58 recommendations from the Evergreen Report dated October 10, 2013.

SCOPE:

This follow-up audit addresses statements and representations made by the ESE Department to senior management in its March, 2015 tracking document.

METHODOLOGY:

We performed steps to verify the actions taken and the status of each of the recommendations in the Evergreen report as presented by the ESE Department during FY 2013-2015. We attempted to determine that all the Evergreen recommendations are being tracked for study and implementation.

We reviewed supporting documentation maintained by the ESE and Budget Departments to determine the status of recommendations and actions taken as reported in the tracking document.

Our audit was conducted in accordance with the *International Standards for the Professional Practice of Internal Auditing* of the Institute of Internal Auditors and included such procedures as deemed necessary to achieve the objective. Internal Auditing is an independent, objective assurance and consulting activity designed to add value and improve an organization's operations. It helps an organization accomplish its objectives by bringing a systematic, disciplined approach

to evaluate and improve the effectiveness of risk management, control, and governance processes. We are required to note any material deficiencies in accordance with Florida Statutes, School Board Policy and sound business practices. We also offer suggestions to improve controls or operational efficiency and effectiveness.

FINDING

The statements and representations made by the ESE Department were generally accurate. All 58 recommendations are being addressed unless an action is outside of ESE department control. However, we noted the following opportunities for improvement:

- Four (Recommendations 4, 19, 20, 44) instances where the data in the tracking document were not in agreement with the underlying supporting documentation.
- Nine (Recommendations 3, 15, 20, 26, 35-37, 44, 46) instances where the data in the tracking document could not be verified with original source or system documentation, such as the Student Management System or Professional Development System Online.

It should be noted that Management has taken corrective action and updated the tracking document with accurate information. Management has also created a process to compile Professional Development participation totals for face to face and online training.

The results from this follow-up review are presented in the accompanying table showing the recommendation numbers from the original Evergreen report along with brief descriptions of each and management's responses as reported to senior management.

RECOMMENDATION

We recommend that the Department perform a data verification step and ensure that source documentation is maintained to support information included in reports provided to senior management.

We wish to thank the staff of the ESE Department for their cooperation and assistance in the performance of this audit.

Vince Roberts, CIA, Internal Auditor

Program Evaluation Comment (From Evergreen Report)	Management Action (As Reported to Senior Management)	March 2015 Status (As Reported to Senior Management)	Audit Follow Up Results
CONTINUUM OF PLACEMENTS AND SERVICES			
Recommendation 1 "Examine current guidance being provided to IEP teams regarding placement decisions and ensure that it clearly and accurately describes the team's obligation and authority to include in the IEP the services and supports necessary to provide a free appropriate public education (FAPE) in the least restrictive environment."	<p>1. Change terminology in OCPS from "center" schools to "cluster" schools (in alignment with IDEA and SB 1108).</p> <p>2. Provide clearer definitions and examples of Least Restrictive Environment (LRE) for school based administrators and teachers.</p> <p>3. Develop a guiding document (similar to More Restrictive Placement [MRP] packet) for IEP teams to use when considering FAPE in the LRE.</p>	<p>1. Completed effective 2013-2014 school year. Districtwide training for School Staffing Specialists (SSS) in Sept. 2013 included language and new forms.</p> <p>2. Districtwide SSS training in Sept. 2013 and Sept. 2014 included PEER update, and PEER handbook (updated 2014) includes references to definitions and examples of LRE, including how to document it appropriately in an IEP.</p> <p>3. Current procedural documents for teams to use when considering the need for more intense and individualized services and supports for a student include guidelines, criteria, supporting data and documentation required to demonstrate the support needed for the student to receive FAPE in the LRE. Districtwide training for SSS in September 2013 included more restrictive placement (MRP) discussions and requirements.</p>	A review of training agendas and power point presentations on the ESE Department intranet site confirms periodic training and guidance is provided.
Recommendation 2: "Continue moving towards stronger district control of basic ESE programmatic policies, including ensuring that sufficient	1. Increase the supports and services provided in general education settings.	1. Assigned ESE Instructional Coaches to all Learning Communities for the purpose of building capacity within school teams to support	A list of Instructional Coaches and Mental Health Counselors for each Learning Community was

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<p>special education, related services, and supplementary aids and services are available within each school to meet the needs of its students to the extent possible."</p>	<p>2. Identify and replicate schools who have "effective and intentionally planned support systems with multiple levels or types of service for students articulating from elementary schools"</p>	<p>general education teachers in closing the achievement gap for SWD. An additional five new Certified Mental Health Counselors were added for the 2014-15 year. They support Emotional Behavioral Disorder (EBD) students and "high risk" general education students, as well as provide professional development on recognizing the signs and symptoms of those needing mental health services.</p> <p>2. Two additional intensive sites were duplicated for elementary school students with an additional site for middle school opening in 2015-16 and an additional high school site that opened this year.</p>	<p>provided. The list was cross referenced with the SAP system with no exceptions.</p> <p>A review of the SAP system found two Mental Health Counselors were hired in September 2014 and one was hired in January 2015. Two were appointed in February 2015.</p> <p>Excel spreadsheet and SMS screen prints were provided showing student transfers.</p>
<p>Recommendation 3: "Establish baseline levels of ESE service and support that all traditional school sites must make available to ensure student progress in the general curriculum, including direct (i.e., teacher-to-student) ESE service and support."</p>	<p>3. In collaboration with the Florida Inclusion Network (FIN), develop PD for school administrators and teachers describing a variety of in-class supports for Students with Disabilities (SWD) including the step-by-step process for implementing each type of support.</p>	<p>3. A series of eight total Administrator modules have been released for completion since the summer of 2013. To date 723 OCPS administrators have completed them. A new Universal Design for Learning (UDL) Module opened July 2014 as online PD focused on helping teachers and administrators understand learner variability, understand the shift from serving students based on disability label to serving students based on need, and how UDL principles and guidelines can be used to reduce barriers to learning while minimizing the impact/effect of disability and maximizing opportunities for learning.</p>	<p>Professional Development modules were developed, however we were unable to verify the number of administrators completing the training modules.</p>

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<p>Recommendation 4: “Review the use of consultative services for students who do not receive any other direct ESE instruction or support.”</p>	<p>2. Determine the number of students with consultation as the only service identified on their IEP.</p>	<p>2. An internal consultation audit was completed during the 2012-13 school year. In September 2012 there were approximately 6,647 students receiving consultation services districtwide. District Staffing Specialists (DSS) monitor the compliance of consultation documentation at schools on a monthly basis and include results in monitoring reports that are provided to principals.</p>	<p>During our fieldwork, Management provided us a spreadsheet that showed 3,468 students were receiving consultation services. After the exit conference, Management provided us two additional spreadsheets that were prepared during the 2012/2013 period that showed 6,673 and 5,806 students were receiving consultation services.</p>
<p>Recommendation 5: “Analyze on a school-by-school basis the extent to which teacher caseloads, in particular consulting teachers, are reasonably calculated to provide meaningful support to students with disabilities.”</p>	<p>1. Compile the caseload numbers and instruction responsibilities for teachers providing consultation as identified through the ESE Guarantee budget process.</p> <p>2. Research information relative to appropriate caseloads for ESE teachers including the resources provided in the Evergreen report (pg. 4-20).</p> <p>3. Develop guidance for schools in assigning caseloads to ESE teachers for monitoring and completing IEP paperwork.</p> <p>6. Provide additional allocations of specialized personnel so that the availability of technical assistance</p>	<p>1. LCPS monitor the number of students in a unit at each school in alignment with the teacher and para support to ensure the adult to student ratio is appropriate. No other monitoring of teacher caseloads is completed.</p> <p>2. This recommendation is currently under review.</p> <p>3. The ESE Guarantee worksheet includes recommended caseloads for teachers responsible for Consultation services.</p> <p>6. This recommendation is currently under review.</p>	<p>East Learning Community spreadsheet with number of students in a unit at each school was provided.</p> <p>No comment since action is currently under review.</p> <p>ESE Guarantee documents received did include caseload information.</p> <p>No comment since action is currently under review.</p>

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	provided by "specialists" can be increased districtwide.		
Recommendation 6: "Review on a school-by-school basis the nature of consultation services provided to students with disabilities, the extent to which the services are implemented in accordance with district expectations, and the extent to which they meet student needs."	Consider the use of an outside consultant to assist with the following actions. Clearly define consultation as a service delivery model including the consideration of ESE eligibility for students with consultation on their IEP.	Consultation guidelines were revised in 2012 with training provided January 2013 for all school staffing specialists. Communication to staffing specialists and principals was provided in February 2013.	A review of the ESE Department intranet site found guidelines, training agendas and power point presentations. The District Staffing Specialist Monitoring Report reviews consultative services at schools each month.
Recommendation 7: "Review all policies and procedures regarding placement in center schools to ensure that decisions are not based primarily on disability category, lack of flexibility in the way services and supports are made available, or unreasonably limited service options available within the zoned school."	Same as 1.	Same as 1.	Same as 1.
Recommendation 8: "Establish a stakeholder team of district, area, and school-based staff; parents; and community early childhood agency representatives to develop a strategic plan of action to create formal collaborative agreements with early childhood partners within the community."	1. Complete a comprehensive review of the OCPS Preschool Diagnostic Intervention Services (PDIS) department. 2. Visit and review the PreK inclusionary programs in Broward and Pinellas school districts.	1. In conjunction with the OCPS Preschool Diagnostics Intervention Services (PDIS) team, the Public Consulting Group (PCG) completed a review and analysis of PDIS in early 2014. 2. Data and information were gathered from various districts as a part of the PDIS review process.	PDIS was reviewed by a third party and a Draft Report was provided. To reduce costs, a Final Report was not received. Data gathered from various districts were noted in the Draft Report.

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	3. Per Evergreen report, utilize the "Prekindergarten Children with Disabilities Expanding Opportunities for Providing Services: A Guide for Making System and Program Level Decisions" to facilitate future decisions relative to the provision of services available to PreK students with disabilities in OCPS.	3. An Inclusive PreK committee was formed that was comprised of VPK educators, ESE PreK educators, Directors of Teaching and Learning and ESE, an Area Superintendent, Exec. Area Director, ES, MS, and HS principals, Sr. Admin. for Budget, and Transportation to determine the need and develop options for building inclusive PreK classes distributed throughout the district including support and professional development plans. ESE collaborated with the Curriculum and Instruction team in 2014 to develop an inclusive PreK model offering a continuum of services at the new Washington Shores Early Learning Center (WSELC).	Documentation from the Pre-K committee was provided to us.
INCLUSIONARY PRACTICES AND STUDENT ACCESS TO THE GENERAL CURRICULUM			
Recommendation 9: "Enhance technical assistance provided to principals to reinforce the expectation that IEP teams consider the individual student's needs first, and then work with school leadership to ensure the necessary supports are available."	Same as 1.	Same as 1.	Same as 1.

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Recommendation 10: "Expand the use of support facilitation, co-teaching, and/or assignment of dual-certified teachers."	4. Collaborate with ESE Directors from size-alike districts to review effective practices when implementing service delivery models focused on in-class supports for SWD.	4. Very Large District meetings convened 1/31/13, 7/15/13, 1/16/14, 5/29/14, 1/23/14. Next meeting scheduled 4/17/15.	We noted meeting agendas to confirm meetings took place. A Guide for Coaching Support Facilitation Teachers was developed.
Recommendation 11: "Solicit input from size-alike peer districts and/or regional neighboring districts to identify schools in which funding models are sufficient for support facilitation or co-teaching, and/or those in which dual-certified teachers are effectively meeting both the general education and ESE needs of students."	Same as 10.	Same as 10.	Same as 10.
Recommendation 12: "Implement common planning times for grade level or subject area teams to the extent possible."	4. Collaborate with Labor Relations and CTA to determine language for consideration in the instructional contract relative to ESE teacher caseloads as well as responsibilities for IEP development and monitoring. 5. Research and recommend ways in which principals can provide increased opportunities for common planning times and collaboration between ESE and general education professionals focused on in-class supports for SWD. 6. Ensure principals are following instructional contract requirements for dedicated planning time for teachers.	4. This action is currently under review. 5. This action is currently under review. 6. This action is currently under review.	This action appears to be outside of the ESE Department's control. No comment since action is currently under review. No comment since action is currently under review.

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<p>Recommendation 13: "Conduct a detailed analysis of assessment results by school or grade level that includes the particular instructional materials and methods implemented to identify those aspects of curriculum and instruction most likely to be in need of revision."</p>	<p>1. Develop a group of stakeholders including ESE administrators, C&I administrators, teachers, and ARA personnel to analyze and correlate the instructional materials/methods used with SWD and their effect on student assessment results.</p>	<p>1. Established a collaborative administrative team with ESE and Curriculum and Instruction (C & I) to review the K-12 Reading plan and analyze the instructional framework of the ELA block, including alignment of programs, resources and instructional materials.</p>	<p>ESE and Curriculum and Instruction collaboration documentation was maintained.</p>
<p>Recommendation 14: "Solicit input from curriculum specialists in the enrollment group regarding instructional materials and methods used in their districts to assist in determining whether the discrepancy in OCPS student outcomes are the result of issues of curriculum or instruction."</p>	<p>2. Identify instructional materials currently used in schools that align with CCSS while providing effective instructional alternatives and support for SWD.</p>	<p>2. A collaborative team was assembled and is currently conducting an ongoing systematic review of Comprehensive Intervention Reading Programs (System 44, Read 180 and Achieve) used in the Reading classes at the secondary level. A review was conducted with FIN, Scholastic consultants, Achieve consultants, ESE C & I coaches and administrators, and C & I literacy team members, for the purpose of identifying and leveraging UDL principles and guidelines to remove barriers to learning and optimize levels of support in reading classrooms implementing the support facilitation model of ESE service delivery. In their focus on early intervention for SWD, the ESE Learning Community Program Specialists (LCPS) are monitoring the instructional materials and strategies in use with targeted 2nd and 3rd grade students. The LCPS are brainstorming with school teams to ensure effective interventions are implemented when necessary.</p>	<p>ESE and Curriculum and Instruction collaboration documentation was maintained.</p>

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<p>Recommendation 15: "Use the multi-tiered system of supports (MTSS) process to ensure that within each school the core instruction is effective with at least 80 percent of students, that proven effective supplemental instruction and support are provided to all students who require it, and that a well-defined set of intensive individualized interventions to address a range of subjects and skills are identified and communicated to all teachers."</p>	<ol style="list-style-type: none"> 1. Clearly define and implement the MTSS process on a districtwide basis including the roles and responsibilities of district personnel in the Division of Teaching and Learning. 2. Prioritize PBS, CHAMPS, classroom management, and various other behavioral PD sessions currently available to teachers. 3. Increase the level and amount of behavioral supports and resources available to schools for serving behaviorally challenging students (including non-ESE students) to strengthen the foundation of Tier 1, 2, and 3 level interventions. 	<ol style="list-style-type: none"> 1. Three School Psychologists serve on the District's Multi-Tiered System of Supports (MTSS) Consortium Committee and help create trainings to present district-wide. District Staffing Specialists (DSS) serve as an ESE compliance representative on the districtwide MTSS Consortium that meets monthly through the Teaching and Learning division. Additionally, referrals for initial evaluations are captured and monitored in a district based SharePoint site that is used by SSS, DSS, psychologists, social workers, SLPs, and other ESE personnel. 2. Behavioral PD sessions have been increased and provided throughout the year from the ESE Behavioral Support team. As of March 2015, at least 2,294 OCPS personnel have attended some kind of behavior based PD session during the 2014-15 school year. At total of 970 attended during the 2013-14 school year. 3. This action is currently under review. 	<p>Documentation of MTSS Training was developed.</p> <p>Professional development was provided but we were unable to verify the number of personnel that have completed the training sessions.</p> <p>No comment since action is currently under review.</p>

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Recommendation 16: "When implementing MTSS, ensure that issues of social/emotional development and classroom management are provided a level of attention equal to that provided to academic subjects. Establish and implement system-wide behavioral support systems and ensure that teacher and PS/RtI team members are provided the necessary resources to meet their students' needs."	Same as 15.	Same as 15.	Same as 15.
Recommendation 17: "Engage in frequent and explicit communication with school and learning community administrators and program specialists regarding any changes in the nature or amount of services and resources that may be available to support inclusionary practices as a result of recommendations proposed under other sections of this report."	5. Develop focus groups including FIN, school and district based administrators, staffing specialists, ESE teachers, and general education teachers to collaborate on effective practices when implementing service delivery models focused on in-class supports for SWD.	5. In May 2014, a team of over 25 district representatives including administrators, teachers, parents, and community members completed the FLDOE/Florida Inclusion Network's (FIN) BPIE Assessment (Best Practices in Inclusionary Education). Follow-up meetings for the purpose of action planning with district ESE administrators and FIN representatives were held in June and December 2014, with a future meeting scheduled for March 2015.	FIN & BPIE meeting documentation was provided
AVAILABILITY, PROVISION, AND QUALITY OF SPECIALIZED INSTRUCTION AND SERVICES			
Recommendation 18: "Ensure that school staff – especially administrators, counselors, and staffing specialists are uniformly familiar with and held accountable for	1. In alignment with the district Special Programs and Procedures (SP&P) document, re-organize current ESE procedural documents and technical assistance into an	1. The PEER Handbook has been in electronic format and available since 2012. All plan related forms are available in PEER and others for compliance are being made	Verified that the ESE Department intranet site has numerous procedural documents and forms available for all staff.

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compliance with procedures required for IEP changes.	electronic manual accessible to all school administrators, staffing specialists, teachers, and other pertinent staff members.	accessible via the district implementation of FORMATTA which was effective fall 2014. Through the transition to FORMATTA the ESE Procedures department continues to maintain all procedural documents and forms for IDEA and Section 504 compliance via the OCPS intranet website.	The Peer Handbook updated in 2015 was noted on the ESE Department intranet site.
<p>Recommendation 19: "Develop a systematic approach to supporting rising ESE middle school students that ensures a framework of support regardless of the middle school they attend."</p>	7. Create summer transition camps and/or transitional classes for rising 6th grade SWD to support them as they move into the middle school environment.	7. During the summer of 2014 students entering 7 high schools and 6 middle schools participated in transition camps to assist in preparing them for entering the next school. Transition camps will continue to be implemented for the summer of 2015.	<p>The documentation that was provided showed 10 High Schools and 24 Middle Schools participated in the 2014 camps.</p> <p>We received student rosters for 2014 and noted two duplicate student entries in the Excel document.</p> <p>The 2015 rosters omitted one District middle school from the master list.</p>
<p>Recommendation 20: "Examine staff turnover of Speech/Language Pathologists (SLPs) with respect to caseload/workload issues."</p>	<p>1. Collect and analyze historical information related to the allocation of SLPs in the district relative to the student and school populations.</p> <p>2. Review the caseloads and workloads of current SLPs beyond responsibilities of providing direct student services and supports.</p>	<p>1. The Speech-Language Program Specialists, with the assistance from school SLPs and SLP mentors assembled and analyzed the SLP caseloads by school for 2013-14 and in 2014-15.</p> <p>2. The results of that analysis reflect a shortage of 49 SLPs in 2013-14 and 58 SLPs in 2014-15 based on the American Speech- Language and Hearing Association (ASHA) caseload</p>	<p>Analysis for 2013/2014 and 2014/2015 was conducted.</p> <p>The documents provided showed a shortage of 63 SLP's in 2014/2015. The Department was unable to provide documentation to</p>

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	<p>3. Identify barriers to maintaining and hiring adequate numbers of SLPs each year.</p> <p>4. Consider alternative service delivery models that provide the support students need for success in the general education environment including the effects of those models on the current SLP workforce.</p>	<p>guidelines. ASHA membership is required of each school based SLP in order to be licensed to provide speech and language therapy within public schools in the U.S.</p> <p>3. The SLP Program Specialists and Director, ESE Specialized Services, met with the Speech and Language Consortium of Central Florida in Feb. 2013, Aug. 2013, and Apr. 2014 where caseloads were discussed along with barriers for SLP recruitment and retention. One major barrier identified is the limited number of master degree program seats available locally through the University of Central Florida. Another barrier is the need for SLPs with BA degrees to take a long term leave of absence in order to work towards their master's degree due to classes only offered during the day time.</p> <p>4. The SLP Program Specialists and Director, ESE Specialized Services have met continually with vendors of contracted Speech and Language services as well as virtual therapy since May 2013. Each of these models requires funding sources. As of Mar. 2015, two contracted SLPs will provide makeup sessions due to resignations and requests for long term leaves of absence. In addition, the SLP Program Specialists and the Director, ESE Specialized Services identified the need for additional SLPs to reduce caseloads that would allow</p>	support the student enrollment totals used in the analysis.

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	<p>5. Identify additional financial resources available for increasing the allocation of SLPs in the district.</p>	<p>the shift in service delivery away from pull-out to providing therapy support in the classrooms which is considered the most effective option for supporting the individual student's needs.</p> <p>5. Budget estimates were developed and submitted for approval in general funds to increase the number of Speech and Language Pathologists (SLP) needed.</p>	<p>Verified with the Budget Department that there has been no increase of Speech and Language Pathologists positions.</p>
<p>Recommendation 21: "Develop procedures that create a seamless framework for implementation of RtI within a framework of MTSS across all OCPS schools."</p>	<p>Same as 15 & 16.</p>	<p>Same as 15 & 16.</p>	<p>Same as 15 & 16.</p>
<p>Recommendation 22: "Examine the reasons behind the patterns of graduation and dropout rates among OCPS students with disabilities, identify factors affecting the trend, and develop strategies to reverse it."</p>	<p>1. Analyze statistical data to determine the accuracy and/or possible source errors in the data reported for graduation and dropout rates since 2009-10.</p> <p>2. Identify specific procedures for ensuring accuracy in reporting for future years.</p> <p>3. Examine trends and strategies used in size-alike districts to support more positive results in the future.</p>	<p>1. Baseline criteria changed at state level with special diploma graduates not being included in the graduation rate calculation.</p> <p>2. A collaboration with the Accountability, Research, and Assessment department has been created to assist in obtaining data.</p> <p>3. On-going discussions occur with other large districts to determine practices utilized to increase the graduation rate. One practice has been the use of Inclusion Coaches at the high school level.</p>	<p>Graduation and dropout documentation was provided.</p> <p>Email documentation between the Departments was provided.</p> <p>Documentation was provided but we noted that the use of Inclusion Coaches has decreased when the school's operating budget was responsible for the funding.</p>

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<p>Recommendation 23: "Examine OCPS program placement determination in light of the impact of decisions on the length of student bus rides and ensure that all transportation-related procedures are uniformly followed in the district."</p>	<p>4. Review current guidance and documents that are in place for IEP teams to use when considering the needs for special ESE transportation and revise as needed.</p> <p>5. Assess the financial impact, transportation considerations, and student enrollment implications of duplicating special ESE programs/schools, such as DHH, Cherokee, Magnolia, and Gateway in additional locations throughout the district.</p>	<p>4. Procedures for determining a student's need for Transportation as a Related Service were revised in the summer of 2014 in collaboration with the transportation department. Training was provided Sept. 2014. Professional development was provided from Sept - Dec. 2014 for 627 transportation staff members through 10 face-to-face sessions related to meeting the needs of students with disabilities (SWD) during transport with a focus on behavior and health related issues.</p> <p>5. Moved all elementary level students requiring intensive level support from Magnolia (MRP) into five different traditional schools (one per learning community). Created a new intensive unit at Lake Nona HS to balance out Winter Park HS and Magnolia School. Consideration is under way to add an intensive unit at Odyssey MS beginning in August 2015 to reduce travel time for students from the east side of the district.</p>	<p>A review of training agendas and power point presentations on the ESE Department intranet site confirmed that procedures were revised and periodic training is provided.</p> <p>Student Management System print screen documentation was provided to support student transfers.</p>
<p>Recommendation 24: "Develop strategies to extend the impact the Assistive Technology Office has on ESE students' educational opportunities in all OCPS schools."</p>	<p>1. In collaboration with the Speech-Language and Specialized Instruction departments, review the current work processes of the AT team and determine areas that can be streamlined into more efficient and productive outcomes.</p>	<p>1. The Assistive Technology team created a process to distribute screening information to school staff to expedite the provision of assistive technology (AT) devices with the expectation that some students' accessibility and/or communication needs can be met as a result of the</p>	<p>Assistive Technology Considerations and Training documents were available.</p>

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	<p>2. Provide increased training for staffing specialists relative to AT processes and procedures.</p> <p>3. Per the recommendations cited in the Evergreen report, consult with colleagues in Miami-Dade regarding the plan they are following (modeled after Fairfax, Virginia and Montgomery County, Maryland) to expand the outreach of their limited AT department.</p>	<p>screening prior to the need to request a formal AT re-evaluation. This was completed by 9/2013. Professional development was provided to all school and district staffing specialists on how to conduct AT screenings and identify the need for referral of a student for further evaluation of AT needs.</p> <p>2. Training to conduct AT screenings and the process to refer a student for further AT evaluation was provided to all district and school staffing specialists in 9/2013 with a refresher in 12/2013.</p> <p>3. The AT staff is in current discussion with Dade County Public Schools regarding the process used for distributing screenings and evaluations.</p>	<p>A review of training agendas and power point presentations on the ESE Department intranet site confirms periodic training is provided.</p> <p>Dade County Public Schools documentation was available.</p>
STAFF UTILIZATION AND RESOURCE MANAGEMENT			
Recommendation 25: “Reorganize the reporting structure for the Associate Superintendents of Exceptional Student Education and Curriculum and Instruction.”	Action statement not evident on March 2015 tracking document.	Reorganization completed prior to March 2015 tracking document.	A Department organization chart as of February 2015 was provided.
Recommendation 26: “Improve district ESE meetings to create more interaction, sharing, engagement, problem-solving,	2. Increase current ESE learning community meetings and utilize 4th Wednesday PD sessions to restructure department meetings and	2. The ESE department hosts districtwide and mini-trainings in learning communities throughout the year including information related to	A review of training agendas and power point presentations on the ESE Department intranet site

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and learning."	trainings while providing more interaction, collaboration, and problem-solving amongst ESE team members at the school and district level.	compliance, behavior support, curriculum and instruction, assistive technology, transition, etc. Face-to-face professional development was provided to 6,710 participants in 2013-14 and to 5,814 participants districtwide as of March 2015. Additionally, a total of 10,553 administrators and teachers have completed the online ESE administrator, teacher, and UDL modules.	confirms periodic training is provided. Professional development was provided but we were unable to verify the number of participants that completed face-to-face and online modules.
Recommendation 27: "Develop processes for ensuring consistency in critical ESE areas."	3. Require school administrators to attend face-to-face ESE compliance and procedural trainings with their school Staffing Specialists.	3. This action is currently under review.	This action appears to be outside of ESE Department control.
Recommendation 28: "Use the ratios of psychologists and social workers recommended by NCLB as a goal to move towards over the next five years."	6. Collect information from size-alike districts in conjunction with recommended national ratios to increase the allocations of school psychologists and social workers.	6. The Social Worker (SW) ad hoc CTA committee presented recommended SW: student ratios to district leadership in May 2014.	Social Worker committee documentation was provided.
Recommendation 29: "Develop procedures that provide the district information regarding reasons behind staff turnover rates."	7. Build capacity in district ESE administrators to decrease dependency on single owners of information and processes.	7. Weekly meetings occur with ESE Directors to discuss specific areas in the ESE department to increase knowledge. Information is shared from the ESE Directors to their administrators from the weekly meetings.	Minutes of a sample of Leadership Meetings were maintained.
Recommendation 30: "Increase staffing to support the mental health and behavioral needs of OCPS students."	8. Increase the allocations of behavior support personnel (analysts) and mental health counselors districtwide to support the critical upward trend in	8. An additional five Certified Mental Health Counselors were added to the district level in August 2014.	A review of SAP found two Mental Health Counselors were hired in September 2014 and one was hired in

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	the need for services in these areas.		January 2015. Two were appointed in February 2015.
Recommendation 31: "Develop procedures to ensure principal input into staff assignment."	9. Collaborate with the Labor Relations department, OESPA representatives, and the Human Relations department to develop procedures that will allow increased opportunities for principal input into support staff assigned through the re-assignment process.	9. This action is currently under review.	No comment since action is currently under review.
Recommendation 32: "Finalize plans to review the effectiveness of the ESE Guarantee and its impact on ESE students."	8. Require Principals, APIs, Staffing Specialists, Counselors, and Inclusion Coaches to participate as a team in Professional Development focusing on the FIN scheduling process and utilization of the ESE Guarantee. 9. Monitor the use of the ESE Guarantee and its implementation at the school level.	8. This action is currently under review. 9. ESE Guarantee guidelines were developed and disseminated in Spring 2013. A meeting was held with SALT on 2/11/15 to review the process for the 2015-16 budget year. The ESE leadership team met on 3/4/15 to review the process. ESE Directors and LCPS will meet with Area Supts and Principals for 2015 budget meetings.	This action appears to be outside of the ESE Department control. ESE Guarantee documentation and meeting minutes were available.
Recommendation 33: "Include in core training, deemed critical by the district, elements that support fidelity of implementation."	1. Implement procedures related to recent accountability measures including deliverables and scales for department PD sessions.	1. The Behavior Department is streamlining the follow up procedures for every PD that is provided.	Professional Development summary documentation was maintained.

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Recommendation 34: "Build on the online training that has proven beneficial to topics identified by principals and staffing specialists to meet their needs and that adds consistency to procedures the staffing specialists use."	4. Continue the development of online modules for critical ESE procedural and compliance processes (i.e. Senate Bill 1108 requirements, MRP, ESY, etc.).	4. OCPS Transition team administrators and staff presented information on the Transition assessment and provided an FAQ document to school staffing specialist at the Dec. 2014 districtwide meeting. The Transition SSS provided training to the Transition teachers and job coaches on compliance requirements for Transition IEPs during the following meeting dates: 8/2013, 1/2014, 6/2014, 8/2014, 1/2015, 6/2015.	Transition training documentation and FAQ document were available.
Recommendation 35: "Plan more conceretedly for both general and special education teachers to learn the knowledge and skills they need as co-teachers of all students in the district and individual schools."	2. Require all teachers to complete the online ESE Module 9: "Intense Focus on Student Achievement – Meeting the Needs of Students with Disabilities."	2. As of March 2015, records indicate that 9,179 teachers have completed the online ESE Module 9: "Intense Focus on Student Achievement – Meeting the Needs of Students with Disabilities".	Training modules were available but we were unable to verify the number of teachers that have completed the modules.
Recommendation 36: "Evaluate curricular and instructional resources to identify those needing additional materials for ESE students and develop appropriate materials."	3. Identify funding resources that will provide access to instructional materials that align with CCSS and provide effective instructional alternatives and support for SWD. 4. Research and replicate instructional methods that are proven to increase the performance of SWD as shown in assessment results.	3. This recommendation is currently under review. 4. A collaborative team (FIN, ESE C & I coaches and admin, STO Coaches, and C & I literacy team members) was assembled to create a coaching rubric aligned to the Marzano Framework, incorporating UDL principles and guidelines, and inclusive of research on recognized and proven methods for increasing	No comment since action is currently under review. Same as 10.

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	<p>5. Provide increased PD that is focused on instructional strategies for general education teachers when serving SWD.</p>	<p>instructional intensity in reading classrooms implementing the support facilitation model of ESE service delivery. As LCPS work with their schools and identify effective programs based on student performance data, they make recommendations to replicate the proven methods in other schools.</p> <p>5. The UDL module was released in July 2014 and to date 651 OCPS teachers and administrators have completed it.</p>	<p>Training modules were available but we were unable to verify the number of teachers & administrators that completed the modules.</p>
Recommendation 37: "Expand the array of training offered to ESE paraprofessionals in Orange County Public Schools.	4. Release the ESE module titled Non-Instructional Personnel: Meeting the Needs of Students with Disabilities	4. The ESE module titled Non-Instructional Personnel: Meeting the Needs of Students with Disabilities was released in the fall of 2013 and 1,887 OCPS personnel have completed it as of March 2015.	Training modules were available but we were unable to verify the number of non-instructional personnel that completed the modules.
ENTRANCE AND EXIT PROCESSES AND PROCEDURES			
Recommendation 38: "Conduct a review of student referral records (MTSS to ESE eligibility)."	Same as 15 & 16.	Same as 15 & 16.	Same as 15 & 16.
Recommendation 39: "Incorporate technical assistance and support to foster team members' confidence in the integrity and validity of the data	Same as 15 & 16.	Same as 15 & 16.	Same as 15 & 16.

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produced through PS/Rtl, in conjunction with the recommendations related to MTSS implementation and oversight addressed in the Availability, Provision, and Quality of Specialized Instruction and Services section of this report.”			
Recommendation 40: “Review the use of consultative services for students who do not receive any other direct ESE instruction or support to identify students who should be reevaluated to determine if they continue to need special education and related services or should be dismissed from ESE, as stated in Section 4.1, Continuum of Services and Placements.”	3. Analyze the progress and performance of each student (from #2 in finding 4) and determine the scope of students who may need to be considered for a change in services and/or for reevaluation to consider dismissal from ESE.	3. The ESE Procedures department will develop and implement a plan for the 2015-16 school year to accomplish this action	The plan for 2015/2016 is still under development. The District Staffing Specialist Monitoring Report reviews consultative services at schools each month.
SECONDARY TRANSITION PROCESSES, PROCEDURES, AND OUTCOMES			
Recommendation 41: “Establish collaborative relationships among transition directors and specialists in other enrollment group districts.	1. Continue participation with very large district collaborative meetings each quarter where services for students with disabilities serve as the focus of discussions and activities.	1. Very Large District meetings were convened 1/31/13, 7/15/13, 1/16/14, 5/29/14, 1/23/14. Next meeting scheduled 4/17/15.	A review of agendas confirmed meetings occurred.
Recommendation 42: “Establish a districtwide baseline of expectations for transition services to be provided in all high	2. Review, revise and clarify current CBVE and overall Transition program guidelines to ensure students are	2. The Transition program guidelines have been reviewed and revised between 11/2014 and 2/2015 to	Transition Program application was provided.

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schools to ensure students are being provided the necessary instruction and behavioral supports to prepare them for community-based placements, including soft employability skills in addition to job-specific technical skills."	receiving the required academic and behavioral support necessary to prepare them for future program components.	streamline the process of student candidate selection and placement in specific transition sites including review of behavior support requirements. The process involved staff from schools, OCPS legal department, representation of business partners, and the OCPS Transition staff.	
Recommendation 43: "Develop guidelines for transition program staff and IEP team members to use to ensure students are not excluded from community-based placements on the basis of infractions that occurred in the past and are unlikely to be repeated."	3. Review current Transition Program rubrics and admission requirements to ensure student's prior behavioral offenses are reviewed and treated consistently when considerations for program participation and placement is in process.	3. OCPS legal reviewed and approved the student candidate selection criteria and process in 2/2013 and again in 1/2015.	Documentation from Legal for February 2013 and January 2015 was not available. Current email from Legal approving the candidate selection criteria was available.
Recommendation 44: "Investigate opportunities to expand the available CTE programs to include jobs or skills more likely to be attainable by the group of students with disabilities who are most at risk of dropping out or not obtaining a standard diploma."	No action evident on tracking document.	Additional Information: The number of OCPS Transition classrooms / business partnerships has expanded from seven in 2012-13 to 15 in 2013-14 to offer students authentic job training skills coupled with soft skills needed to obtain and maintain employment. OCPS expanded High School High Tech programs from nine high schools in 2012-13 to all 19 high schools in 2014-15 supporting students with disabilities who are working toward a standard diploma. HSHT student enrollment has increased from 256 students in 2012-13 to 450 students in 2014-15. The ESE Transition team is collaborating with Career and Technical Education	The totals on the tracking document were not in agreement with the supporting documents. We also noted that the Department was unable to provide any source documentation to support the student enrollment totals.

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		(CTE) and Teaching and Learning to identify a process of awarding Modified Occupational Completion Points while aligning curriculum to create academic and vocational pathways for students with disabilities seeking vocational training.	
<p>Recommendation 45: “Convene a stakeholder workgroup to conduct a gap analysis to clearly define “where the district is” and “where the district wants to be” with regard to transition services and student outcomes, when implementing Priority B (Conduct a comprehensive review/evaluation of all transition programming, with a focus on how schools are implementing vocational education for ESE students and develop a guide based on researched best practices and effective service delivery models).”</p>	No action evident on tracking document.	Same as 44.	Same as 44.
<p>Recommendation 46: “Expand IEP training for secondary teachers to emphasize the role of measurable postsecondary goals as the foundation upon which the rest of the IEP should be developed.”</p>	2. Increase current ESE learning community meetings and utilize 4th Wednesday PD sessions to restructure department meetings and trainings while providing more interaction, collaboration, and problem-solving amongst ESE team members at the school and district level.	2. The ESE department hosts districtwide and mini-trainings in learning communities throughout the year including information related to compliance, behavior support, curriculum and instruction, assistive technology, transition, etc. Face-to-face professional development was provided to 6,710 participants in 2013-14 and to 5,814 participants districtwide as of March 2015.	<p>A review of training agendas and power point presentations on the ESE Department intranet site confirms periodic training is provided.</p> <p>Professional development was provided but we were unable to verify the number of participants that have</p>

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		Additionally, a total of 10,553 administrators and teachers have completed the online ESE administrator, teacher, and UDL modules.	completed training.
Recommendation 47: "In conjunction with the recommendations related to decreasing reliance on consultation as a sole ESE support, incorporate into IEP training the importance of technical and soft skills students need for successful employment in addition to traditional academic skills. Provide clear guidelines for how this should be reflected through goals and services as the IEP is being developed."	Same as 46.	Same as 46.	Same as 46.
GIFTED SERVICE DELIVERY MODEL			
Recommendation 48: "Designate an ESE administrator to supervise the gifted program for a minimum of half-time."	10. Assign responsibilities specific to Gifted program oversight to the ESE Director for Curriculum and Instruction.	10. Responsibilities of Gifted program oversight have been formally assigned under the ESE Director for Curriculum and Instruction.	Verified on Department internet contact list and in the SAP system.
Recommendation 49: "Continue to implement the recommendations of the work group. (12-member district Gifted work group)."	1. Review the recommendations made from the previous Gifted work group, determine which recommendations are yet to be implemented, and determine next steps in further implementation.	1. The Gifted Steering Committee met on 1/28/14 and 2/25/14. Recommendations were solicited on problem-solving in regard to existing barriers that constrain and reduce the capacity for schools to serve their own gifted students. No dates have	Gifted Steering Committee meeting minutes were maintained.

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		<p>been established for the Gifted Advisory Committee to reconvene. In the 2014-15 school year priority was given for establishing an District Academically Accelerated Individualized Model (AAIM) Advisory Committee which met on 1/7/15 and an AAIM Parent Advisory Committee which met on 2/4/15. The purpose of the District AAIM Advisory Committee is to make the AAIM referral process as explicit and as transparent as possible and to solicit input from individuals who have experience and familiarity with the AAIM referral process and/or are stakeholders in providing this educational service to Gifted learners. The purpose of the AAIM Parent Advisory Committee is to review and provide input on the AAIM Philosophy, Purpose & Curricular Framework, Procedures for Identification of Students and Referral, and Characteristics of Students who demonstrate Success in AAIM.</p>	
Recommendation 50: "Recreate the Principal Survey on gifted program models and hold principals accountable for its timely completion."	2. Revise and disseminate the principal survey for Gifted service delivery models.	2. The Principal survey on gifted was sent in Dr. Jara's Newsletter October 2014; results were compiled and contact was made with schools who did not respond.	Newsletter, Survey, Results and Follow up emails with schools who did not respond were available for review.
Recommendation 51: "Increase the number of professional development opportunities for gifted education teachers."	3. Analyze all current professional development sessions sponsored by the ESE department and determine areas of future need including specific	3. Behavior Department trainings are open to all instructional staff, with the exception of PCM. ESE Curriculum and Instruction is developing summer	Meeting the Social Emotional Needs of High School Students who are Gifted power point

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	content for general education teachers and gifted teachers.	PD sessions titled "Supporting the Social/Emotional Needs of Gifted Learners" targeted at the high school level to assist teachers in understanding the social and emotional components of giftedness and strategies that can support the social and emotional needs of gifted learners.	presentation was provided.
Recommendation 52: "Develop a best practices database for gifted programs in Orange County Public Schools."	3. Develop an online database for gifted programs where examples of best practices, activities, and service delivery information can be stored and managed.	3. The ESE Curriculum and Instruction department provided a recommendation for 2015-2016 Strategic Monitoring Card to include: Investigate recognized and proven resources for teaching & learning of Gifted & Develop a searchable repository for resources accessible by teachers of Gifted.	Recommended instructional resources for all grade levels are maintained on the Gifted intranet site.
PARENTS AS PARTNERS			
Recommendation 53: "Finalize an accurate and comprehensive job description for the Lead Parent Resource Specialist and Parent Resource Specialist to include all required job duties and requirements."	1. Determine the need for, and then develop, job descriptions for all PST members beyond their vendor contracts/scope of work and deliverables.	1. The scope of work and service deliverables for all ESE Parent Support Team (PST) members were reviewed and revised by the ESE department during the summer of 2014. Upon approval through procurement, new contracts were implemented beginning the 2014-15 school year.	Consultant Statement of Work Contracts were obtained from the Procurement Department for FY 2014/2015 and the ESE Department provided all contracts for FY 2015/2016.
Recommendation 54: "Establish performance objectives, targets, and indicators for the Parent Support Team, and track impact on student outcomes."	2. Establish a system of collecting and analyzing PST activities and their impact on student outcomes.	2. Each PST member reports bi-weekly information related to phone calls and emails with OCPS parents as well as community meetings, events and functions they attend as a PST member.	Bi-weekly reports that were reviewed and approved by the ESE Senior Director were maintained with payment documentation.

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<p>Recommendation 55: “Provide training to PST members in the IEP Team process and increase parent awareness of PST availability to attend IEP meetings.”</p>	<p>4. Provide job shadowing opportunities for newer PST members to attend IEP meetings with veteran members.</p>	<p>4. All PST members attend IEP meetings as needed, often in pairs, so they can observe and discuss manners of support for parents. Monthly collaborative meetings are also held with all PST members and the Sr. Director for ESE to discuss situations where their involvement was needed and to problem-solve solutions.</p>	<p>Training videos are available on the ESE Department internet. Meeting Agendas and Minutes were provided.</p>
<p>Recommendation 56: “Track the number of viewers for the online parent training module (Module 13: Introduction and Overview of Exceptional Student Education for Parents).”</p>	<p>3. Determine the capability of tracking the number of participants who view and complete the online Parent module.</p>	<p>3. In order to make the parent module available and accessible to all parents, it was placed on the OCPS website. Per OCPS guidelines the number of people who access the module cannot be tracked in the same manner that other modules can be tracked through the PDSOnline system where they are located.</p>	<p>Training videos are available on the ESE Department internet.</p>
<p>Recommendation 57: “Develop a communications plan for interacting with ESE parents and stakeholders.</p>	<p>5. Increase communication methods to parents of ESE students to make them aware of the services provided by the PST. 6. Administer the district based parent survey to parents of ESE students including efforts to increase the number of respondents and utilization of the results in future adjustments to program delivery.</p>	<p>5. In addition to previous methods, parents of ESE students are provided information through all OCPS Parent Academy events where PST members host sessions and a vendor table. 6. This action is currently under review.</p>	<p>We received documentation to confirm that multiple Parent events occurred. It was stated that this action is being deleted.</p>

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<p>Recommendation 58: “Develop a basic online system for Parent Support Team members to capture, store, and share ESE best practices and documents.”</p>	<p>7. Develop an online database available to all PST members where examples of best practices, activities, and performance documents can be stored and managed.</p>	<p>7. This action is currently under review.</p>	<p>Parent Team members have access to a Shared Folder with best practices and other resource documents.</p>

AUDIT RESPONSE MATRIX

FISCAL PERIOD: _____

DEPARTMENT/SCHOOL:
ADMINISTRATOR/PRINCIPAL:
DEPARTMENT HEAD/AREA SUPERINTENDENT:

Exceptional Student Education – Evergreen Report
Kimberly Steinke
Vickie Cartwright

Exception Noted What is? What should be?	Management Response What needs to be done?	Responsible Person Who needs to do it?	Outcome Timeline When will the action be completed? What is the evidence of completion?
<p>Data in the tracking document was not in agreement with the underlying supporting documentation.</p> <p>Data in the tracking document could not be verified with the original source or system documentation, specifically SMS or PDS Online.</p> <p>Specifically:</p> <ul style="list-style-type: none"> • Recommendation 4 – Consultation Students 2012-13 reflected 6,467 in original document but supporting documentation could not be consistently verified. • Recommendation 19 – Rosters from the 2014 and 2015 summer transition camps noted two duplicate 	<ul style="list-style-type: none"> • Consultation audit will be completed again in its entirety for the 2015-16 school year. • A data-entry field will be added to the new Student Information System to indicate students receiving “consultation” services. • Rosters for 2016 camps and beyond will be re-examined for accuracy prior to completion of data reporting. 	<ul style="list-style-type: none"> • Director, ESE Procedures and Sr. Director, ESE Services • Director and Sr. Administrator for ESE Curriculum & Instruction 	<ul style="list-style-type: none"> • Completion date = May 2016 • Evidence of completion will include data tracking documents and final report. • August of each year • Summer Camp Rosters

<p>student entries and omitted one middle school from the master list.</p> <ul style="list-style-type: none"> • Recommendation 20 and 44 – Student enrollment totals used in the analysis of SLP caseloads or with Transition programs could not be verified. • Recommendation 3, 15, 26, 35-37 and 46 – Professional Development modules were developed but the number of participants completing modules could not be consistently verified. 	<ul style="list-style-type: none"> • Anytime student enrollment data is included in a report, copies of the source system information (SMS or EDW) must be archived for future reference. • Participants who complete online professional development through PDSOnline, and then leave the district, fall out of the system's database for recordkeeping, thus making ongoing enrollment and participation records inconsistent. Simultaneously, the ESE department has established its own access database to track personnel who participate in face-to-face PD sessions. As a result of the Evergreen audit, the ESE department has created a monthly reporting protocol to ensure accurate data is routinely reported for the number of personnel who complete both online and face-to-face PD. 	<ul style="list-style-type: none"> • All ESE Administrators • All ESE Administrators and ESE Resource Teachers 	<ul style="list-style-type: none"> • Data reported as needed • Source and date information for all data pulled will also be included on all reporting documents. • Monthly PD reports • PD sign-in sheets, online reports, access database reports, and monthly PDSOnline “WhoDunit” reports.