



Florida Department of Education  
Bureau of Exceptional Education and Student Services

## 2012 LEA Profile

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Commissioner

### Introduction

District:	Enrollment Group:	PK-12 Population:	Percent Disabled:
<b>Okaloosa</b>	<b>20,000 to 40,000</b>	<b>29,384</b>	<b>14%</b>

The LEA profile is intended to provide districts with a tool for use in planning for systemic improvement in exceptional education programs. The profile contains a series of data indicators that describe measures of educational benefit, educational environment, prevalence, parent involvement and provides information about **district performance as compared to state level targets in Florida's State Performance Plan (SPP)**. Required by IDEA 2004, the State Performance Plan (2005-2012) is an eight-year plan that establishes annual benchmarks and targets for 20 indicators. Annual Performance Reports (APR) are submitted to report progress in these performance areas and the process requires annual public reporting for the state and each local education agency.

Data in the LEA profile are presented for the district and the state. Where appropriate and available, comparative data for enrollment group and/or general education students are included. Indicators in **bold** are part of the State Performance Plan.

Data presented as indicators of educational benefit (*Section One*)

- **NCLB graduation rate**
- Federal uniform high school graduation rate
- Standard diploma graduation rate
- **Dropout rate**
- **Postschool outcome data**

*Note: Statewide assessment data (participation and performance) are published separately in the fall of each year.*

Data presented as indicators of educational environment (*Section Two*)

- **Students with disabilities ages 6-21 by placement setting**
- **Children with disabilities ages 3-5 by placement setting**
- **Part C to Part B transition**
- **Secondary Transition IEPs**
- **Students with disabilities suspended/expelled for more than 10 days in a school year**

Data presented as indicators of prevalence (*Section Three*)

- **Evaluations completed within 60 days**
- Student membership by race/ethnicity
- **Risk ratios of racial/ethnic groups identified as disabled**

Data presented as an indicator of parent involvement (*Section Four*)

- **Survey of parent perceptions**

Selected State Performance Plan indicators (*Section Five*)

- **Summary information on selected state performance plan indicators**
- **State level targets**
- **District level data**

### **Data Sources and Reporting**

The data contained in this profile were obtained from data submitted electronically by districts through the Department of Education Information Database in surveys 2 and 5, parent survey submissions, the Florida self-assessment monitoring system, the Florida Education and Training Placement Information Program (FETPIP), and through the Department of Health (DOH) Early Steps program.

Data contained in Section One through Section Four are rounded to the nearest whole number. Because rounding is not used in determining if SPP targets have been met, data in Section Five contain all decimal places.

### **Districts in Enrollment Group:**

Alachua, Bay, Clay, Hernando, Leon, Okaloosa, Santa Rosa, St. Johns, St. Lucie

## **Section One: Educational Benefit**

Educational benefit refers to the extent to which children benefit from their educational experience. Progression through and completion of school are dimensions of educational benefit as are postschool outcomes. This section of the profile provides data on indicators of school completion, and postschool outcomes.

### **No Child Left Behind (NCLB) Graduation Rate:**

The number of first-time ninth graders from four years ago, plus incoming transfer students on the same schedule to graduate, minus students from this population who transferred out or left to enroll in a private school, home education, or adult education, divided into the number of standard diploma graduates from the same group. The resulting percentages are reported for **2008-09** and **2009-10** for students with disabilities and all students.

#### **Student with Disabilities**

	2008-09	2009-10
Okaloosa	67%	68%
Enrollment Group	51%	56%
State	47%	49%

#### **All Students**

	2008-09	2009-10
Okaloosa	90%	90%
Enrollment Group	80%	82%
State	76%	78%

**Federal Uniform High School Graduation Rate:**

Beginning with the 2010-11 school year, the U.S. Department of Education adopted a new graduation rate calculation. This calculation uses the number of first-time ninth graders from four years ago, plus incoming transfer students on the same schedule to graduate, minus students from this population who transferred out or left to enroll in a private school or home education divided into the number of standard diploma graduates (does not include DJJ students who are not standard diploma recipients) from the same group. The resulting percentages are reported for **2010-11** for students with disabilities and all students.

**Student with Disabilities**

	2010-11
Okaloosa	63%
Enrollment Group	48%
State	44%

**All Students**

	2010-11
Okaloosa	85%
Enrollment Group	73%
State	71%

**Standard Diploma Graduation Rate:**

The number of standard diploma graduates divided by the number of students with disabilities who completed their education (received either a standard diploma, GED, special diploma, certificate of completion or special certificate of completion) or dropped out. This graduation rate is calculated based on the total number of students with disabilities who exited school in a given year, rather than using the four-year cohort model described in the NCLB graduation rate. The data are reported for the three year period from **2008-09** through **2010-11**.

**Standard Diploma Graduation Rate for Students with Disabilities**

	2008-09	2009-10	2010-11
Okaloosa	69%	67%	80%
Enrollment Group	54%	56%	59%
State	50%	53%	54%

**Dropout Rate:**

The number of students grades 9-12 for whom a dropout withdrawal reason (DNE, W05, W11, W13-W23) was reported, divided by the total enrollment of grades 9-12 students and students who did not enter school as expected (DNEs) as reported at the end of the school year (survey 5). The resulting percentages are reported for students with disabilities, all students, students identified as emotionally/behaviorally disabled (EBD), and students identified as specific learning disabled (SLD) for the years **2008-09** through **2010-11**.

**Dropout Rate for Students with Disabilities**

	2008-09	2009-10	2010-11
Okaloosa	<1%	1%	<1%
Enrollment Group	3%	3%	3%
State	4%	4%	4%

**Dropout Rate for All Students**

	2008-09	2009-10	2010-11
Okaloosa	1%	<1%	<1%
Enrollment Group	2%	1%	2%
State	2%	2%	2%

**Dropout Rate for EBD Students**

	2008-09	2009-10	2010-11
Okaloosa	<1%	<1%	<1%
Enrollment Group	6%	6%	6%
State	7%	6%	7%

**Dropout Rate for SLD Students**

	2008-09	2009-10	2010-11
Okaloosa	2%	2%	<1%
Enrollment Group	3%	3%	3%
State	4%	4%	4%

**Postschool Outcome Data:**

The Florida Education and Training Placement Information Program (FETPIP) is an interagency data collection system that obtains follow-up data on former students. The most recent FETPIP data available reports on students who exited Florida public schools during the **2009-10** school year. The table below displays percentage of students with disabilities exiting school in **2007-08** through **2009-10** who were found during the fall/winter following the school year and were (1) enrolled in higher education, (2) enrolled in higher education or competitively employed, and (3) enrolled in higher education or some other postsecondary education or training program or competitively employed or employed in some other employment.

**Students with Disabilities in Higher Education**

	2007-08	2008-09	2009-10
Okaloosa	29%	32%	26%
Enrollment Group	29%	29%	29%
State	24%	27%	27%

**Students with Disabilities in Higher Education/Competitively Employed**

	2007-08	2008-09	2009-10
Okaloosa	45%	45%	44%
Enrollment Group	44%	40%	40%
State	40%	37%	39%

**Students with Disabilities in any Employment or Continuing Education**

	2007-08	2008-09	2009-10
Okaloosa	57%	58%	56%
Enrollment Group	57%	52%	52%
State	54%	50%	51%

**Section Two: Educational Environment**

Indicators related to educational environment address the extent to which students with disabilities receive special education with their nondisabled peers, timely transition from Part C programs to Part B programs, secondary transition IEPs, and risk ratios of out-of-school suspensions/expulsions for students with disabilities when compared to nondisabled peers.

**Regular Class, Resource Room, Separate Class Placement, and Other Separate Environments, Ages 6-21:**

The number of students with disabilities ages 6-21 in regular class, resource room, separate class, and other separate environment, divided by the total number of students with disabilities ages 6-21 reported October (survey 2). Regular class includes students who spend 80% or more of their school week with nondisabled peers. Resource room includes students spending between 40% and 80% of their school

week with nondisabled peers. Separate class includes students spending less than 40% of their week with nondisabled peers. Other separate environment includes students served in public or private separate schools, residential placements or hospital/homebound placements. The resulting percentages are reported for the three years from **2009-10** through **2011-12**. Students served in corrections facilities and students enrolled by their parents in private schools who are receiving special education and/or related services from the LEA are not included in this calculation.

**Regular Class**

	2009-10	2010-11	2011-12
Okaloosa	75%	74%	75%
Enrollment Group	71%	71%	73%
State	67%	69%	68%

**Resource Room**

	2009-10	2010-11	2011-12
Okaloosa	8%	8%	6%
Enrollment Group	12%	11%	10%
State	13%	12%	12%

**Separate Class**

	2009-10	2010-11	2011-12
Okaloosa	13%	13%	13%
Enrollment Group	14%	14%	15%
State	16%	15%	17%

**Other Separate Environment**

	2009-10	2010-11	2011-12
Okaloosa	4%	5%	5%
Enrollment Group	3%	3%	3%
State	4%	4%	4%

**Early Childhood Education Settings, Ages 3-5:**

The number of students with disabilities ages 3-5 attending a regular early childhood program or kindergarten at least 10 hours a week *and* receiving the majority of special education and related services in the regular early childhood program; attending a regular early childhood program or kindergarten at least 10 hours a week *and* receiving the majority of special education and related services outside the regular early childhood program; attending a regular early childhood program or kindergarten less than 10 hours a week *and* receiving the majority of special education and related services in the regular early childhood program; attending a regular early childhood program or kindergarten less than 10 hours a week *and* receiving the majority of special education and related services outside the regular early childhood program; attending a special education program in a class with less than 50% nondisabled children; attending a public or private day school designed specifically for children with disabilities; or in another separate environment (residential facility, home or service provider location) divided by the total number of students with disabilities ages 3-5 reported in October (survey 2). Students attending a regular early childhood program or kindergarten are those who spend any time in a program that includes at least 50% nondisabled children. The resulting percentages are reported for **2010-11** and **2011-12**.

**Regular Early Childhood Program or Kindergarten ≥ 10 Hours**

	Services in the Regular Classroom 2010-11	Services in the Regular Classroom 2011-12	Services out of the Regular Classroom 2010-11	Services out of the Regular Classroom 2011-12
Okaloosa	12%	1%	1%	4%
Enrollment Group	27%	15%	18%	14%
State	24%	22%	11%	12%

**Regular Early Childhood Program or Kindergarten < 10 Hours**

	Services in the Regular Classroom 2010-11	Services in the Regular Classroom 2011-12	Services out of the Regular Classroom 2010-11	Services out of the Regular Classroom 2011-12
Okaloosa	3%	15%	2%	<1%
Enrollment Group	7%	4%	7%	7%
State	11%	8%	4%	5%

**Separate Class and Separate School**

	Separate Class 2010-11	Separate Class 2011-12	Separate School 2010-11	Separate School 2011-12
Okaloosa	77%	72%	3%	2%
Enrollment Group	33%	55%	4%	2%
State	39%	44%	6%	5%

**Other Separate Environment**

	Other Separate Environment 2010-11	Other Separate Environment 2011-12
Okaloosa	1%	5%
Enrollment Group	4%	4%
State	5%	4%

**Part C to Part B Transition:**

The number of children referred for eligibility determination by Part C prior to age 3, who are found eligible for Part B, and who have an IEP developed and implemented by their third birthdays, divided by the number of children served in Part C and referred to Part B for eligibility determination (not including children determined to be ineligible for Part B prior to age 3 or children for whom parent refusal to provide consent caused delays in evaluation or initial services). The resulting percentages are reported for **2008-09** through **2010-11**.

**IEP Developed and Implemented by 3rd Birthday**

	2008-09	2009-10	2010-11
Okaloosa	98%	100%	100%
State	99%	100%	100%

**Secondary Transition IEPs:**

The percentage of compliant transition IEPs are calculated by dividing (a) the number of youth with IEPs aged 16 and above with an IEP that includes appropriate measurable postsecondary goals that are annually updated and based upon an age appropriate transition assessment, transition services, including courses of study, that will reasonably enable the student to meet those postsecondary goals, and annual IEP goals related to the student's transition services needs by (b) the number of youth with an IEP age 16 and above. The resulting percentages are reported for **2008-09** through **2010-11**. The **2010-11** data represent new baseline data for Indicator 13.

**Transition IEPs Found Compliant**

	2008-09	2009-10	2010-11
Okaloosa	88%	88%	100%
State	61%	82%	89%

**Discipline Rates and Risk Ratios:**

Discipline rates for students with disabilities and nondisabled students are calculated by dividing the number of students who received out-of-school suspensions or expulsions totaling more than 10 days by total-year enrollment as reported at the end of the school year (survey 5). The risk ratio is calculated by dividing the discipline rate of students with disabilities by the discipline rate of nondisabled students. A risk ratio of 1.0 indicates that students with disabilities and nondisabled students are equally likely to be suspended/expelled. The resulting rates are reported for students with disabilities and nondisabled students for three years from **2008-09** through **2010-11** along with risk ratios for students with disabilities.

**Students with Disabilities Suspended/Expelled For Greater than 10 Days**

	2008-09	2009-10	2010-11
Okaloosa	<1%	<1%	1%
State	2%	1%	1%

**Nondisabled Students Suspended/Expelled For Greater than 10 Days**

	2008-09	2009-10	2010-11
Okaloosa	<1%	<1%	<1%
State	<1%	<1%	<1%

**Discipline Risk Ratios**

	2008-09	2009-10	2010-11
Okaloosa	1.60	1.68	2.26
State	1.56	1.44	1.43

Discipline risk ratios by racial/ethnic group are calculated for students with disabilities by dividing the discipline rate of a specific racial/ethnic group by the rate of all nondisabled students. A risk ratio of 1.0 indicates that, for instance, Hispanic students with disabilities are equally likely to be suspended/expelled as all nondisabled students. The resulting risk ratios are reported for students with disabilities by race/ethnicity for the state and district during the **2010-11** school year. Blank cells indicate that there are less than 10 students with disabilities for a specific racial/ethnic group suspended/expelled for greater than 10 days.

**Discipline Risk Ratios by Race/Ethnicity**

	State	District
White	0.86	1.92
Black	2.81	4.62
Hispanic	1.14	
Asian	0.32	
American Indian/Alaskan Native	0.94	
Native Hawaiian/Other Pacific Island		
Two or more races	1.26	

**Section Three: Prevalence**

Indicators relative to the prevalence of students with disabilities include the percentage of students evaluated within 60 days, student membership by racial/ethnic category, and risk ratios of racial/ethnic groups being identified as disabled. Beginning with the 2009-10 school year, race and ethnicity are reported using seven categories to comply with federal requirements.

**Evaluation within 60 Days:**

The number of students who were evaluated within 60 days of receipt of parent consent divided by the total number of students with parental consent to evaluate in a given school year as reported via school district survey. The data are reported for **2008-09** through **2010-11**.

**Students Evaluated within 60 Days of Receipt of Parent Consent**

	2008-09	2009-10	2010-11
Okaloosa	100%	100%	100%
Enrollment Group	99%	99%	100%
State	97%	98%	99%

**Student Membership by Racial/Ethnic Category:**

Racial/ethnic membership data for all students and students with disabilities are presented for the state and district as reported in **October 2011** (survey 2).

**All Students**

	State	District
White	42%	70%
Black	23%	13%
Hispanic	29%	8%
Asian	3%	2%
American Indian/Alaskan Native	<1%	<1%
Native Hawaiian/Other Pacific Island	<1%	<1%
Two or more races	3%	7%

**Students with Disabilities**

	State	District
White	43%	67%
Black	26%	18%
Hispanic	27%	7%
Asian	1%	2%
American Indian/Alaskan Native	<1%	<1%
Native Hawaiian/Other Pacific Island	<1%	<1%
Two or more races	3%	6%

**Selected Disabilities by Racial/Ethnic Category:**

Racial/ethnic data for students with a primary disability of SLD, EBD, and intellectually disabled (IND) are presented for the state and district as reported in **October 2011** (survey 2).

**SLD, EBD, and IND Students**

	State SLD	District SLD	State EBD	District EBD	State IND	District IND
White	41%	69%	39%	55%	35%	59%
Black	25%	16%	40%	36%	39%	28%
Hispanic	31%	7%	17%	4%	22%	7%
Asian	<1%	1%	<1%	2%	1%	2%
American Indian/Alaskan Native	<1%	<1%	<1%	<1%	<1%	<1%
Native Hawaiian/Other Pacific Island	<1%	<1%	<1%	<1%	<1%	<1%
Two or more races	3%	6%	3%	3%	2%	3%



**Risk Ratios For Students Placed in Exceptional Education:**

The risk that students of a given race will be identified as a student with a disability or a student in selected disability categories when compared to students of all other races. A risk ratio of 1.0 indicates the students of a given race are equally likely as all other races combined to be identified as disabled. In calculating risk ratios, students reported as multiracial are prorated across other racial/ethnic categories. The data are presented for all students with a disability, students who are identified as IND, EBD, or SLD, and students who are identified as having autism spectrum disorder (ASD), speech or language impairments (SI-LI), other health impaired, or homebound or hospitalized (OHI-HH). The data are presented for the district and the state as reported in **October 2011** (survey 2). A blank cell indicates less than 30 students of a specific race/ethnicity with the given disability.

**State**

	IND	EBD	ASD	SI-LI	OHI-HH	SLD	All Disabled
White	0.73	0.90	1.27	1.26	1.41	0.94	1.04
Black	2.25	2.22	0.70	1.03	0.89	1.14	1.14
Hispanic	0.70	0.52	1.01	0.77	0.82	1.11	0.92
Asian	0.57	0.09	1.06	0.73	0.32	0.29	0.50
American Indian/Alaskan Native	1.07	0.89		1.08	1.13	1.21	1.08
Native Hawaiian/Other Pacific Island				1.05		0.59	0.74
Two or more races	0.70	1.05	1.03	1.06	0.93	0.84	0.92

**District**

	IND	EBD	ASD	SI-LI	OHI-HH	SLD	All Disabled
White	0.65	0.69	1.26	0.77	1.61	1.03	0.90
Black	2.72	2.77		1.66		1.20	1.40
Hispanic				1.06		1.01	0.94
Asian				0.89			0.80
American Indian/Alaskan Native							
Native Hawaiian/Other Pacific Island							
Two or more races				1.01		0.85	0.84

**Section Four: Parent Involvement**

**Parent Survey:**

The parent involvement rate is the number of parents who perceive that schools facilitated parent involvement as a means of improving services and results for children with disabilities, divided by the total number of responding parents. These data are reported for parents of preschool children with disabilities and parents of children with disabilities in grades K-12 for **2008-09** through **2010-11**.

**Preschool**

	2008-09	2009-10	2010-11
Okaloosa	43%	45%	61%
Enrollment Group	45%	48%	53%
State	43%	53%	56%

**Grades K-12**

	2008-09	2009-10	2010-11
Okaloosa	33%	43%	37%
Enrollment Group	32%	39%	41%
State	32%	40%	40%

## Section Five: Selected State Performance Plan Indicators

The following table includes selected state performance plan indicators, the state targets for 2010-11 for these indicators, district data, and whether or not the district met the target. State targets are presented in **bold**. Because rounding is not used in determining if targets have been met, LEA data contain as many decimal places as needed to determine if the target has been met. If, for example, 3.9% of students with disabilities in a given district drop out of school, the district will not be considered as having met the target of 3.5%. For indicators 4, 9, and 10, an "N" in the Target Met column means that a district's data contributed to Florida not making the state target. For indicators 1, 2, and 4, the data lag one year, meaning that data are from the 2009-10 school year, although more recent data may also be found in this profile.

Indicator	2010-11 State-Level Target	LEA Data	Target Met
1. Graduation rate	The percentage of students graduating with a standard diploma in 2009-10 will increase to <b>49%</b> .	68.31%	Y
2. Dropout rate	The dropout rate for students with disabilities in 2009-10 will decrease to <b>3.5%</b> .	1.29%	Y
3. Participation and performance of children with disabilities on statewide assessments	<b>99%</b> of students with disabilities in grades three through ten will participate in statewide assessment for reading.	98.68%	N
	<b>99%</b> of students with disabilities in grades three through ten will participate in statewide assessment for math.	98.48%	N
	<b>53%</b> of students with disabilities in grades three through ten will demonstrate proficiency in reading.	51.19%	N
	<b>55%</b> of students with disabilities in grades three through ten will demonstrate proficiency in math.	56.63%	Y
4. Rates of suspension and expulsion	<b>0%</b> of districts are identified by the state as having a significant discrepancy (a risk ratio of 3.0 or higher) in the rates of suspensions and expulsions of children with IEPs for greater than 10 days.	1.68	Y
	<b>0%</b> of districts are identified by the state as having both (a) a significant discrepancy (a risk ratio of 3.0 or higher) in the rates of suspensions and expulsions of children with IEPs by race or ethnicity for greater than 10 days and (b) policies, procedures or practices that contribute to the significant discrepancy and do not comply with requirements relating to the development and implementation of IEPs, the use of positive behavioral interventions and supports, and procedural safeguards.		Y
5. FAPE in the LRE, children ages 6-21	Increase the percentage of students with IEPs age 6 to 21 years removed from regular class placement for less than 21% of the day to <b>61.8%</b> .	74.48%	Y
	Decrease the percentage of student with IEPs age 6-21 years removed from regular class placement for greater than 60% of the day to <b>18.3%</b> .	12.69%	Y
	Decrease the percentage of students with IEPs age 6 to 21 years served in public or private separate schools, residential placements, or homebound or hospital placements to <b>2.5%</b> .	5.09%	N

Indicator	2010-11 State-Level Target	LEA Data	Target Met
7. Prekindergarten performance	66% of children who entered preschool below grade expectations will substantially increase their growth in positive social emotional skills by the time they exit the preschool program.	62.86%	N
	59.1% of children who entered preschool below grade expectations will substantially increase their growth in acquisition and use of knowledge and skills by the time they exit the preschool program.	60.38%	Y
	59.6% of children who entered preschool below grade expectations will substantially increase their growth in use of appropriate behaviors to meet their needs by the time they exit the PK program.	44.44%	N
	75.9% of children were functioning within age expectations in positive social emotional skills by the time they turn 6 years of age or exit the preschool program.	80.25%	Y
	53.0% of children were functioning within age expectations in acquisition and use of knowledge and skills by the time they turn 6 years of age or exit the preschool program.	69.14%	Y
	73.4% of children were functioning within age expectations in use of appropriate behaviors to meet their needs by the time they turn 6 years of age or exit the preschool program.	74.07%	Y
8. Parent involvement	51% of parents with a preschool child receiving special education services report that schools facilitate parent involvement as a means of improving services and results for children with disabilities.	60.87%	Y
	41% of parents with a child in K-12 receiving special education services report that schools facilitate parent involvement as a means of improving services and results for children with disabilities.	36.84%	N
9. Disproportionality in Special Education	In 0% of districts with disproportionate representation of racial and ethnic groups in special education and related services, the disproportionality can be attributed to inappropriate identification.		Y
10. Disproportionality in Specific Disability Categories	In 0% of districts with disproportionate representation of racial and ethnic groups in special education and related services, the disproportionality can be attributed to inappropriate identification.		Y
11. Evaluation within 60 Days	100% of students referred, with parental consent, for evaluation are evaluated within 60 school days of which the student is in attendance.	100.00%	Y
12. Part C children eligible for Part B who have IEPs developed and implemented by their third birthday	100% of children served and referred by part C prior to age 3, who are found eligible for Part B, have an IEP developed and implemented by their third birthday.	100.00%	Y

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Indicator	2010-11 State-Level Target	LEA Data	Target Met
13. Transition IEP Compliance	100% of youth with IEPs aged 16 and above have an IEP that includes appropriate measurable postsecondary goals that are annually updated and based upon an age appropriate transition assessment, transition services, including courses of study, that will reasonably enable the student to meet those postsecondary goals, and annual IEP goals related to the student's transition services needs.	100.00%	Y
14. Postschool Outcomes	27.5% of youth exiting in 2009-10 who are no longer in secondary school, had IEPs in effect at the time they left school, were found enrolled in higher education within one year of leaving high school.	25.76%	N
	37.5% of youth exiting in 2009-10 who are no longer in secondary school, had IEPs in effect at the time they left school, were found in higher education or competitively employed within one year of leaving high school.	44.32%	Y
	50.5% of youth exiting in 2009-10 who are no longer in secondary school, had IEPs in effect at the time they left school, were found enrolled in higher education or in some other postsecondary education or training program; or competitively employed or in some other employment within one year of leaving high school.	56.44%	Y
15. Correction of noncompliance	100% of noncompliance identified through the general supervision system will be corrected no later than one year from identification.	100.00%	Y
20. Timely and accurately reported data*	100% of state reported data (618 and State Performance Plan and Annual Performance Report) are timely and accurate.	100.00%	Y

\*Indicator 20 is calculated based on timely submission of data for Indicators 11 and 12, accuracy of data submitted for indicator 5, timely correction of noncompliance for indicator 15, and reporting CEIS students if funds reserved for CEIS.