FLORIDA DEPARTMENT OF EDUCATION



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June 20, 2008

Mr. W. E. Johnson, Interim Director FSU Research School/Florida High 3000 School House Road Tallahassee, Florida 32311

Dear Mr. Johnson:

The Bureau of Exceptional Education and Student Services is in receipt of your district's response to the preliminary findings of its Exceptional Student Education (ESE) Compliance Self-Assessment. This letter and the attached document(s) comprise the final report for FSU Research School's 2007-08 ESE monitoring.

The self-assessment system is designed to address the major areas of compliance related to the State Performance Plan (SPP). SPP Indicator 15, Timely Correction of Noncompliance, requires that the state identify and correct noncompliance as soon as possible, but no later than one year from identification.

As indicated in prior communication with district ESE staff, it was anticipated that there might be an increase in the number of findings of noncompliance over previous monitoring activities due to the design of the self-assessment protocols and sampling system. While any incident of noncompliance is of concern, it is important to note that, in accordance with the language in SPP Indicator 15, the Bureau's current monitoring system considers the timeliness of correction of noncompliance to be of greatest significance.

On February 22, 2008, the preliminary report of findings from the self-assessment process was released to the district. The preliminary report detailed student-specific incidents of noncompliance that required immediate correction, and identified any standards for which the noncompliance was considered systemic (i.e., evident in $\geq 25\%$ of the records reviewed). In the event that there were systemic findings, a corrective action plan (CAP) was required. In addition,

BAMBI J. LOCKMAN

Chief

Bureau of Exceptional Education and Student Services

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the district participated in a validation review to ensure the accuracy of the self-assessment data. As a result of the validation review, additional incidents or findings of noncompliance requiring correction were identified.

In accordance with guidance from the Office of Special Education Programs (OSEP), U.S. Department of Education, a finding of noncompliance is identified by the standard (i.e., regulation or requirement) that is violated, not by the number of times the standard is violated. While each *incident* of noncompliance must be corrected for the individual student affected, multiple incidents of noncompliance regarding a given standard that occur within a school district are reported as a single *finding* of noncompliance for that district. These results are included in the Bureau's annual reporting to OSEP.

Districts were required to correct all student-specific noncompliance no later than April 25, 2008, and to provide evidence to the Bureau no later than April 30, 2008. All individual incidents of noncompliance were timely corrected; verifying documentation and the district's final CAP were provided to the Bureau on May 6, 2008.

FSU Research School was required to assess 75 standards. One or more incidents of noncompliance were identified on 25 of those standards (33%). The following is a summary of FSU Research School's correction of student-specific incidents of noncompliance:

Correction of Noncompliance by Student

	Number	Percentage
Records Reviewed/Protocols Completed	8	
Total Items Assessed	226	_
Noncompliant	41	18%
Timely Corrected	41	100%

The FSU Research School District Summary Report: Findings of Noncompliance by Standard (Attachment 1) contains a summary of the findings reported by the individual standard or regulation assessed. These data include revisions to the preliminary report that resulted from the validation review. Systemic findings are designated by shaded cells in the table. As noted in this attachment, one or more findings of noncompliance were determined to be systemic in nature and the district was required to develop a CAP to address the identified standards. FSU Research School's CAP was submitted to the Bureau for review and approval, and is provided in Attachment 2. Please note that a timeline for implementation, evaluation, and reporting of results on the part of the district is included in the CAP. Your district's adherence to this schedule is required in order to ensure correction of systemic noncompliance within a year as required by OSEP and Florida's SPP.

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The results of district self-assessments conducted during 2007-08 will be used to inform future monitoring activities, including the selection of districts for on-site monitoring, and in the local educational agency (LEA) determinations required under section 300.603, Title 34, Code of Federal Regulations, which result in districts being identified as "meets requirements," "needs assistance," "needs intervention," or "needs substantial intervention."

We understand that the implementation of this self-assessment required a significant commitment of resources, and appreciate the time and attention your staff has devoted to the process thus far. We look forward to receiving the district's report on the results of its corrective action plan, due to the Bureau no later than **December 22, 2008**. If you have questions regarding this process, please contact your assigned district liaison for monitoring or Dr. Kim C. Komisar, Administrator, at kim.komisar@fldoe.org or via phone at (850) 245-0476.

Sincerely,

Bambol J. Lockman, Chief

Bureau of Exceptional Education and Student Services

Attachments

cc: Rodney Ryan

Frances Haithcock Kim C. Komisar Jill Snelson Sheila Gritz

Florida Department of Education Bureau of Exceptional Education and Student Services

ESE Self-Assessment 2007 – 08

FSU Research School District Summary Report: Findings of Noncompliance by Standard

This report provides a summary of the district's results and must be used when developing a corrective action plan. Results are reported by standard, with systemic noncompliance (occurrence in ≥ 25% of possible incidents) indicated as appropriate. See the *Student Report: Incidents of Noncompliance* for student-specific findings. Results are based on the following:

Number of IEP protocols completed: 4 Number of standards per IEP: 38 Number of STB protocols completed: 2 Number of standards per STB: 28 Total number of protocols: 6
Total number of standards: 208
Total number of incidents of noncompliance (NC): 41
Overall % incidents of noncompliance: 19%

Percent of noncompliance is calculated as the # of incidents of noncompliance for a given standard divided by the # of protocols reviewed for that standard, multiplied by 100.

- * Correctable for the student(s): A finding for which immediate action can be taken to correct the noncompliance.
- ** Individual CAP: For a finding which cannot be corrected for an individual student, a corrective action plan (CAP) is required to address how the district will ensure future compliance; this plan will be limited in scope, based on the nature of the finding.
- *** Systemic CAP: For a finding of noncompliance on a given standard that occurs in ≥ 25% of possible incidents, a corrective action plan (CAP) is required to ensure future compliance; this plan must address the systemic nature of the finding and will be broader in scope than an individual CAP.

Note: In the event that there is a systemic finding of noncompliance on a standard that requires an individual CAP, only a systemic CAP is required.

ESE Self-Assessment 2007 – 08

FSU Lab School District Summary Report: Findings of Noncompliance by Standard

	Noncompliance (NC)		**Individual CAP	# NC	% NC	***Systemic CAP
STB-1	A statement that a purpose of the meeting was the development of a statement of the student's transition services needs (beginning at age 14) or the consideration of the postsecondary goals and transition services (beginning at age 16) A statement that the student would be invited Indication that any agency likely to provide or pay for services during the current year would be invited. (34 CFR 300.322(b)(2); Rule 6A-6.03028(3)(b), FAC.)		X	2	100.0%	X
STB-2	The student was invited to the IEP meeting. (34 CFR 300.321(b)(1); Rule 6A-6.03028(4)(h), FAC.)	Х		1	50.0%	Х
STB-3	The student's strengths, preferences, and interests were taken into account. If the student was unable to attend the meeting, other steps were taken to ensure the student's preferences and interests were considered. (34 CFR 300.43 and 300.321(b)(2); Rule 6A-6.03028(4)(h), FAC.)	X		1	50.0%	X

	Noncompliance (NC)	*Correctable for the Student(s)	**Individual CAP	# NC	% NC	***Systemic CAP
STB-4	The IEP contains a statement of the student's desired post-school outcome A statement of the student's transition service needs is incorporated into applicable components of the IEP The IEP team considered the need for instruction in the area of self determination. (Rule 6A-6.03028(7)(i), FAC.)	X		1	50.0%	X
STB-8	A separate and distinct notice of the transfer of rights was provided closer to the time of the student's 18th birthday. (34 CFR 300.320(c), 300.520(a)(1))		Х	2	100.0%	Х
STB-9	There is a measurable postsecondary goal or goals in the designated areas (i.e., education/training and employment; where appropriate, independent living). (34 CFR 300.320(b)(1))	X		2	100.0%	Х
STB-10	The measurable postsecondary goals were based on age-appropriate transition assessment(s). (34 CFR 300.320(b)(1))	Х		2	100.0%	Х
STB-11	There is/are annual goal(s) or short-term objectives or benchmarks that reasonably enable the student to meet the postsecondary goals. (34 CFR 300.320(a)(2))	X		2	100.0%	Х
STB-12	There are transition services on the IEP that focus on improving the academic and functional achievement of the student to facilitate the student's articulation to post-school. (34 CFR 300.320(b)(2))	X		2	100.0%	Х
STB-13	The transition services include course(s) of study that focus on improving the academic and functional achievement of the student to facilitate the student's articulation from school to post-school. (34 CFR 300.320(b)(2))	Х		2	100.0%	Х

	Noncompliance (NC)		**Individual CAP	# NC	% NC	***Systemic CAP
STB-16	The IEP includes coordinated, measurable, annual IEP goals and transition service that will reasonably enable the student to meet the postsecondary goals. (34 CFR 300.320(b))	Х		2	100.0%	Х
IEP-5	The parents were provided notice of the IEP team meeting a reasonable amount of time prior to the meeting, at least one attempt to invite the parent was through a written notice, and a second attempt was made if no response was received from the first notice. (34 CFR 300.322(a)(1))		Х	2	50.0%	Х
IEP-6	The notice to the IEP team meeting contained the time, location and purpose of the meeting. (34 CFR 300.322(b))		Х	1	25.0%	Х
IEP-7	The notice contained a listing of persons invited to the meeting, by title and position. (34 CFR 300.322(b))		Х	1	25.0%	Х
IEP-13	The IEP for a school-age student includes a statement of present levels of academic achievement and functional performance, including how the student's disability affects involvement and progress in the general curriculum, as well as a statement of the remediation needed to achieve a passing score on the general statewide assessment. For a prekindergarten student, the IEP contains a statement of how the disability affects the student's participation in the appropriate activities. (34 CFR 300.320(a)(1); Rule 6A-6.03028(7)(a), FAC.)	X		3	75.0%	Х
IEP-14	The IEP includes measurable annual goals, including academic and functional goals, and short-term objectives or benchmarks, designed to meet the student's needs that result from the disability to enable the child to be involved in and make progress in the general curriculum and meet the student's other needs that result from the disability. (34 CFR 300.320(a)(2))	X		3	75.0%	Х
IEP-18	The IEP contains a statement of program modifications or classroom accommodations, including location and anticipated initiation, duration and frequency. (34 CFR 300.320(a)(4) and (7) and Rule 6A-6.03028(7)(c), FAC.)	Х		1	25.0%	Х

	Noncompliance (NC)	*Correctable for the Student(s)	**Individual CAP	# NC	% NC	***Systemic CAP
IEP-20	There is alignment among the present level of academic and functional performance statement, the annual goals and short term objectives/benchmarks, and the services identified on the IEP. (34 CFR 300.320(a))	X		2	50.0%	Х
IEP-22	The parent provided consent for the student to receive instructional accommodations not permitted on statewide assessments and acknowledged the implications of such accommodations. (Section 1008.22(3)(c)6, F.S.; Rule 6A-6.03028(7)(e), FAC.)	X		1	25.0%	Х
IEP-24	The IEP contains an explanation of the extent, if any, to which the student will not participate with nondisabled students in the general education class. (34 CFR 300.320(a)(5))	Х		1	25.0%	X
IEP-26	The IEP team considered the strengths of the student; the academic, developmental and functional needs of the student; the results of the initial evaluation or most recent evaluation; and the results of the student's performance on any state-or district-wide assessment. (34 CFR 300.324(a)(1))	X		2	50.0%	Х
IEP-27	The concerns of the parents for enhancing the education of their child were considered in developing the IEP. (34 CFR 300.324(a)(1)(ii))	Х		1	25.0%	Х
IEP-35	If the current IEP represents a change of placement/change of FAPE from the previous IEP, or the district refused to make a change that the parent requested, the parent received appropriate prior written notice. (34 CFR 300.503)		Х	1	25.0%	Х
IEP-36	The report of progress was provided as often as progress was reported to the nondisabled population and described the progress towards annual goals and the extent to which that progress was sufficient to enable the student to achieve such goals by the end of the year. (34 CFR 300.320(a)(3); Rule 6A-6.03028(7)(g), FAC.)	X		2	50.0%	X

	Noncompliance (NC)	*Correctable for the Student(s)	**Individual CAP	# NC	% NC	***Systemic CAP
IEP-37	The IEP had been reviewed at least annually, and revised as appropriate, to address: any lack of progress toward the annual goals; any lack of progress in the general curriculum, if appropriate; the results of reevaluation; information about the student provided by the parent; and/or, the student's anticipated needs. (34 CFR 300.324(b)(1))	X		1	25.0%	X

Florida Department of Education Bureau of Exceptional Education and Student Services

ESE Self-Assessment 2007 – 08

FSU Lab School District Corrective Action Plan

#	Findings of Noncompliance	Activities	Timelines	Resources	Results/Status
IEP-5	The parents were provided notice of the IEP team meeting a reasonable amount of time prior to the meeting, at least one attempt to invite the parent was through a written notice, and a second attempt was made if no response was received from the first notice. (34 CFR 300.322(a)(1))	A minimum of 10 day notice is given with a minimum of 3 contact attempts, one being written notice. Random check of 10 ESE record files will be done in October 2008 to check for appropriate documentation of notice to parents.	Immediate action taken: started April 2008 to be finalized in October 2008	IEP Team	
IEP-6	The notice to the IEP team meeting contained the time, location and purpose of the meeting. (34 CFR 300.322(b))	The time, location, and purpose of meeting is documented on the meeting participation form. Random check of 10 ESE record files will be done in October 2008 to check for appropriate documentation of time, location and purpose of meeting.	Immediate action taken: started April 2008 to be finalized in October 2008	IEP Team	
IEP-7	The notice contained a listing of persons invited to the meeting, by title and position. (34 CFR 300.322(b))	Included on all meeting participation forms. Random check of 10 ESE record files will be done in October 2008 to check for appropriate documentation of persons invited including title/position.	Immediate action taken: started April 2008 to be finalized in October 2008	IEP Team	
IEP-13	The IEP for a school-age student includes a statement of present levels of academic achievement and functional performance, including how the student's disability affects involvement and progress in the general curriculum, as well as a statement of the remediation needed to achieve a passing score on the general statewide assessment. For a prekindergarten	The present level statement is included on all IEPs. Random check of 10 ESE record files will be done in October 2008 to check for inclusion of Present levels of Educational Performance, and how a student's disability affects progress in the general education curriculum, and a statement of remediation to achieve a passing score on FCAT.	Immediate action taken: started April 2008 to be finalized in October 2008	IEP Team	

#	Findings of Noncompliance	Activities	Timelines	Resources	Results/Status
	student, the IEP contains a statement of how the disability affects the student's participation in the appropriate activities. (34 CFR 300.320(a)(1); Rule 6A-6.03028(7)(a), FAC.)				
IEP-14	The IEP includes measurable annual goals, including academic and functional goals, and short-term objectives or benchmarks, designed to meet the student's needs that result from the disability to enable the child to be involved in and make progress in the general curriculum and meet the student's other needs that result from the disability. (34 CFR 300.320(a)(2))	Professional development will be given to ensure that ESE team members have the ability to write measurable annual goals. The professional development will be given on May 9 th and a random check of 10 ESE record files will be done in October 2008 to check for compliance in this area.	Immediate action taken: started April 2008 to be finalized in October 2008	IEP Team FDLRS	
IEP-18	The IEP contains a statement of program modifications or classroom accommodations, including location and anticipated initiation, duration and frequency. (34 CFR 300.320(a)(4) and (7) and Rule 6A-6.03028(7)(c), FAC.)	All IEPs include this statement as a separate from. A random check of 10 ESE record files will be done in October 2008 to check for this form and ensure compliance in this area.	Immediate action taken: started April 2008 to be finalized in October 2008	IEP Team	
IEP-20	There is alignment among the present level of academic and functional performance statement, the annual goals and short term objectives/benchmarks, and the services identified on the IEP. (34 CFR 300.320(a))	Professional development will be given to ensure that ESE team members have the ability to align PLPs and measurable annual goals. The professional development will be given on May 9 th and a random check of 10 ESE record files will be done in October 2008 to check for compliance in this area.	Immediate action taken: started April 2008 to be finalized in October 2008	IEP Team FDLRS	
IEP-22	The parent provided consent for the student to receive instructional accommodations not permitted on statewide assessments and acknowledged the implications of such accommodations. (Section 1008.22(3)(c)6, F.S.; Rule 6A-6.03028(7)(e), FAC.)	All information regarding instructional accommodations on statewide assessments is provided to parents in the IEP.	Immediate action taken: started April 2008 to be finalized in October 2008	IEP Team	

#	Findings of Noncompliance	Activities	Timelines	Resources	Results/Status
IEP-24	The IEP contains an explanation of the extent, if any, to which the student will not participate with nondisabled students in the general education class. (34 CFR 300.320(a)(5))	This is included on all current IEPs. Also will be addressed during professional development on May 9 th , 2008. A random check of 10 ESE record files will be done in October 2008 to check for compliance in this area.	Immediate action taken: started April 2008 to be finalized in October 2008	IEP Team FDLRS	
IEP-26	The IEP team considered the strengths of the student; the academic, developmental and functional needs of the student; the results of the initial evaluation or most recent evaluation; and the results of the student's performance on any state-or district-wide assessment. (34 CFR 300.324(a)(1))	Professional development will be given to ensure that ESE team members have the ability to appropriately include this information on all IEP paperwork. The professional development will be given on May 9 th and a random check of 10 ESE record files will be done in October 2008 to check for compliance in this area.	Immediate action taken: started April 2008 to be finalized in October 2008	IEP Team FDLRS	
IEP-27	The concerns of the parents for enhancing the education of their child were considered in developing the IEP. (34 CFR 300.324(a)(1)(ii))	Page one of our IEP includes the statement from parents in regard to enhancing education. A random check of 10 ESE record files will be done in October 2008 to ensure the appropriate use of this area of the form(s).	Immediate action taken: started April 2008 to be finalized in October 2008	IEP Team	
IEP-35	If the current IEP represents a change of placement/change of FAPE from the previous IEP, or the district refused to make a change that the parent requested, the parent received appropriate prior written notice. (34 CFR 300.503)	Forms are currently being developed by our district that all forms will be in compliance.	Immediate action taken: started April 2008 to be finalized in October 2008	IEP Team FDLRS DOE	
IEP-36	The report of progress was provided as often as progress was reported to the nondisabled population and described the progress towards annual goals and the extent to which that progress was sufficient to enable the student to achieve such goals by the end of the year. (34 CFR 300.320(a)(3); Rule 6A-6.03028(7)(g), FAC.)	All future notice to parents regarding progress toward annual goals will be provided as often as the non-disabled population (every 4.5 for insufficient progress; every 9 weeks for sufficient progress.)	Immediate action taken: started April 2008 to be finalized in October 2008	IEP Team	

#	Findings of Noncompliance	Activities	Timelines	Resources	Results/Status
IEP-37	The IEP had been reviewed at least annually, and revised as appropriate, to address: any lack of progress toward the annual goals; any lack of progress in the general curriculum, if appropriate; the results of reevaluation; information about the student provided by the parent; and/or, the student's anticipated needs. (34 CFR 300.324(b)(1))	Professional development will be given to ensure that ESE team members have the knowledge of the timeline for updating IEP paperwork and the ability to appropriately include this information on all IEP paperwork. The professional development will be given on May 9 th and a random check of 10 ESE record files will be done in October 2008 to check for compliance in this area.	Immediate action taken: started April 2008 to be finalized in October 2008	IEP Team FDLRS DOE	
STB-1	 A statement that a purpose of the meeting was the development of a statement of the student's transition services needs (beginning at age 14) or the consideration of the postsecondary goals and transition services (beginning at age 16) A statement that the student would be invited Indication that any agency likely to provide or pay for services during the current year would be invited. (34 CFR 300.322(b)(2); Rule 6A-6.03028(3)(b), FAC.) 	Notice created to meet guidelines and expectations of notification. A random review of 10 ESE record files will be done in October 2008 to ensure compliance in this area.	Immediate action taken: started April 2008 to be finalized in October 2008	IEP Team	
STB-2	The student was invited to the IEP meeting. (34 CFR 300.321(b)(1); Rule 6A-6.03028(4)(h), FAC.)	Notice is now given to students to invite them to the meeting. A random review of 10 ESE record files will be done in October 2008 to ensure that notice is given.	Immediate action taken: started April 2008 to be finalized in October 2008	IEP Team	

#	Findings of Noncompliance	Activities	Timelines	Resources	Results/Status
STB-3	The student's strengths, preferences, and interests were taken into account. If the student was unable to attend the meeting, other steps were taken to ensure the student's preferences and interests were considered. (34 CFR 300.43 and 300.321(b)(2); Rule 6A-6.03028(4)(h), FAC.)	If student is unable to attend meeting, teacher will meet with student prior to meeting to document student's preferences. This will be included at IEP meeting. A random review of 10 ESE record files will be done in October 2008 to ensure that students' preferences are being considered.	Immediate action taken: started April 2008 to be finalized in October 2008	IEP Team	
STB-4	The IEP contains a statement of the student's desired post-school outcome A statement of the student's transition service needs is incorporated into applicable components of the IEP The IEP team considered the need for instruction in the area of self determination. (Rule 6A-6.03028(7)(i), FAC.)	All future IEP forms will address the post- school outcome needs, transition needs, and self-determination needs of students aged 14 and older. 10 ESE record files will be reviewed in October 2008 to ensure that these needs are considered and addressed.	Immediate action taken: started April 2008 to be finalized in October 2008	IEP Team	
STB-8	A separate and distinct notice of the transfer of rights was provided closer to the time of the student's 18th birthday. (34 CFR 300.320(c), 300.520(a)(1))	Forms are being created by our district and a separate and distinct notice of the transfer of rights will be provided to students by their 18 th birthday. A review of 10 IEPs will be done in October 2008 to check that this was provided to students.	Immediate action taken: started April 2008 to be finalized in October 2008	IEP Team FDLRS	
STB-9	There is a measurable postsecondary goal or goals in the designated areas (i.e., education/training and employment; where appropriate, independent living). (34 CFR 300.320(b)(1))	IEPs/transitions will include measurable goals in pertinent areas pertaining to FSUS (i.e. education) as appropriate. Will review 10 ESE records in October 2008 to ensure goals are measurable and in designated areas applicable to FSUS.	Immediate action taken: started April 2008 to be finalized in October 2008	IEP Team	

#	Findings of Noncompliance	Activities	Timelines	Resources	Results/Status
STB- 10	The measurable postsecondary goals were based on age-appropriate transition assessment(s). (34 CFR 300.320(b)(1))	Our assessments include the FCAT, ACT and SAT. Will consult with DOE transition specialist to expand assessments used. Will review 10 ESE records in October 2008 to make sure this continues to be added.	Immediate action taken: started April 2008 to be finalized in October 2008	IEP Team FDLRS DOE	
STB- 11	There is/are annual goal(s) or short-term objectives or benchmarks that reasonably enable the student to meet the postsecondary goals. (34 CFR 300.320(a)(2))	Professional development will be given to ensure that ESE team members have the ability to write annual goals and STOs to enable the student to meet postsecondary goals. This will take palce on May 9 th and a random check of 10 ESE record files will be done in October 2008 to check for compliance in this area.	Immediate action taken: started May 2008 to be finalized in October 2008	IEP Team FDLRS DOE	
STB- 12	There are transition services on the IEP that focus on improving the academic and functional achievement of the student to facilitate the student's articulation to post-school. (34 CFR 300.320(b)(2))	Professional development will be given to ensure that ESE team members have the ability to address these transition services as applies to our district. This will take place on May 9 th and a random check of 10 ESE record files will be done in October 2008 to check for compliance in this area.	Immediate action taken: started May 2008 to be finalized in October 2008	IEP Team FDLRS DOE	
STB- 13	The transition services include course(s) of study that focus on improving the academic and functional achievement of the student to facilitate the student's articulation from school to post-school. (34 CFR 300.320(b)(2))	Professional development will be given to ensure that ESE team members have the ability to address these transition services as applies to our district. This will take place on May 9 th and a random check of 10 ESE record files will be done in October 2008 to check for compliance in this area.	Immediate action taken: started May 2008 to be finalized in October 2008	IEP Team FDLRS DOE	
STB- 16	The IEP includes coordinated, measurable, annual IEP goals and transition service that will reasonably enable the student to meet the postsecondary goals. (34 CFR 300.320(b))	Professional development will be given to ensure that ESE team members have the ability to address these transition services as applies to our district. This will take place on May 9 th and a random check of 10 ESE record files will be done in October 2008 to check for compliance in this area.	Immediate action taken: started May 2008 to be finalized in October 2008	IEP Team FDLRS DOE	