



15. Services 11/10/17
16. IEP meeting notes 11/9/17
17. Email communication 3/21/18
18. Class schedules 3/25/18
19. Report Cards 3/2/18 and 6/12/17
20. Progress Reports – ending 6/5/17
21. Progress Reports – ending 1/22/18
22. Statement for Regional Orthopedic Impairment Eligibility 9/24/16
23. Note regarding Orthopedic Impairment and meeting scheduled 4/4/18
24. Prior Written Notice 3/15/16
25. Cover sheet for IEP 9/20/15
26. Notice of Team Meeting 9/6/16
27. Evaluation Planning Document 9/7/16
28. Prior Written Notice for re-evaluation 9/7/16
29. Consent for Re-evaluation 9/8/16
30. Written Agreement 9/8/16
31. Prior Written Notice 9/8/16
32. Meeting notes 9/8/16
33. Notice of Transfer of Parent Rights 9/8/16
34. IEP 9/8/16
35. Email communication 9/9/16
36. Email communication 1/2/18
37. Meeting notes of Parent conference 1/17/18
38. Meeting notes of Parent conference 1/2018
39. Email communication 12/11/17
40. Email communication 10/26/17, 11/2/17, 11/3/17
41. Email communication 10/22/17 and 11/3/17
42. Email communication 3/11/18, 3/21/18, 3/22/18
43. Email communication 3/15/18
44. Email communication 3/5/18 and 3/14/18
45. Email communication 11/7/17
46. Email communication 1/2/18
47. Notes of Instructional Assistants 10/4/17 – 3/23/18
48. Correspondence 11/21/13

The Parent provided the following documents in reply to the District's *Response* in this case:

1. Update on the Student's Work 3/5/18
2. Narrative Reply 4/1/18
3. Updated Response – Narrative 4/11/18
4. 2<sup>nd</sup> Period Lesson Plan (photo)
5. 5<sup>th</sup> Period Lesson Plan (photo)
6. 6<sup>th</sup> period – woodshop and photo of project
7. Math work by Student

On April 25, 2018, the Department's Contract Complaint Investigator (Investigator) interviewed District staff by telephone, including five general education teachers, two District Administrators, an Instructional Assistant, and a Special Education Teacher.

The Investigator reviewed and considered all of the documents received in reaching the findings of fact and conclusions of law contained in this order.

## II. ALLEGATIONS AND CONCLUSIONS

The Department has jurisdiction to resolve this Complaint under OAR 581-015-2030 and 34 CFR §§ 300.151-153. The Parent’s allegations and the Department’s conclusions are set out in the chart below. The Department based its conclusions on the Findings of Fact in Section III and the Discussion in Section IV. This Complaint covers the one year period from March 7, 2017 to the filing of the Complaint on March 6, 2018.

	<b>Allegations</b>	<b>Conclusions</b>
(1)	<p><b><u>Free Appropriate Public Education (FAPE); Content of IEP; Transition Services</u></b></p> <p>(a) The Complaint alleges that the District violated the IDEA by failing to provide FAPE, Specially Designed Instruction (SDI) and Transition Services. Specifically, the Complaint alleges concerns in the following classes:</p> <p>Science: that the District has failed to provide FAPE by failing to provide appropriate SDI in the Student’s Science class at the Student’s “comprehension and skill level.”</p> <p>Geography-Other (Art): that the District has failed to provide FAPE by failing to provide appropriate SDI and Related Services, including “tools, adaptable equipment” to accommodate the Student’s</p>	<p><b><u>Not Substantiated</u></b></p> <p>The Student’s current IEP does not contain a Science goal. The Student receives Science instruction primarily through the use of “hands on” objects and visuals projected through a computer. The Student has the opportunity to participate in this general education class, instruction is delivered consistent with the Student’s IEP, and the course material is appropriately modified to the abilities of the Student. The Department does not substantiate the allegation that the instruction provided to the Student in the Student’s Science class denied the Student a FAPE.</p> <p>The Student’s current IEP does not contain a Geography-Other (Art) goal. This class uses art as a medium to explore world geography and culture. An Instructional Assistant provides the Student with assistance in class projects</p>

<p>disability in the Student's "Geography-Other (Art)" class.</p> <p>Social Studies and Math: that the District has failed to Provide FAPE by failing to provide appropriate SDI in the Student's Social Studies and Math classes.</p> <p>Leadership: that the District has failed to provide FAPE by failing to provide any direction and failing to provide appropriate SDI in the Student's "Leadership" class.</p>	<p>when needed. The District has made adaptive tools available to the Student (e.g., incline board, adaptive scissors, large and small pencils with choice of grips, large grip paint brushes) in light of the Student's disability. The Student successfully completes art projects in this class. The Department does not substantiate the allegation that instruction provided to the Student in Geography-Other (Art) denied the Student a FAPE.</p> <p>The Student's current IEP does not contain a Social Studies goal. The Student's Social Studies instruction is modified based upon the skill level of the Student. Instruction is delivered in small groups, instructional materials are read to the Student either by an Instructional Assistant or another student under Instructional Assistant supervision, and key words are highlighted during this process. The Department does not substantiate the allegation that instruction provided to the Student in Social Studies denied the Student a FAPE.</p> <p>The Student attends a Consumer Math class that emphasizes functional mathematics skills such as calculating time and counting money. The mathematics instruction that is delivered to the Student is appropriate and tailored to the Student's skill level and Math IEP goal. The Department does not substantiate the allegation that instruction provided to the Student in Math denied the Student a FAPE.</p> <p>The Student's current IEP does not contain a Leadership goal. In this general education class, the teacher pairs up with the Student, partly to ensure Student's safety. The Student assists with classroom activities including developing the class's mission statement, selecting companies to seek monetary donations, as well as companies to receive donations. The Student interacts socially with staff and</p>
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	<p>Woodshop: that the District has failed to provide FAPE by failing to provide appropriate SDI in the Student's Woodshop class; and by failing to provide specific projects without the Parent directing the projects.</p> <p>Spelling: that the District has failed to provide FAPE by failing to provide appropriate SDI and by failing to provide sufficient staff to instruct the Student in the Student's Spelling class.</p> <p>(b) The Complaint further alleges that District has failed to provide adequate Transition Services to the Student to prepare the Student for the "real world."</p>	<p>other students. The Department does not substantiate the allegation that instruction provided to the Student in Leadership denied the Student a FAPE.</p> <p>The Student's current IEP does not contain a Woodshop goal. The Student has successfully completed five to seven projects in the Industrial Arts class. The Industrial Arts teacher achieved a balance between assisting with tasks unsafe for the Student and allowing the Student to perform tasks. When the Student expresses exhaustion or pain, the teacher and Student play a game on the computer in an effort to address the social skills goal in the Student's IEP. The Student's program in Industrial Arts is appropriately modified. The Department does not substantiate the allegation that instruction provided to the Student in "Woodshop" denied the Student a FAPE.</p> <p>The Student's current IEP contains an English goal that includes a spelling component, as well as specially designed instruction in the areas of "Functional Academics" and "Reading."</p> <p>The Student does not have a "Spelling" class, although spelling packets are sometimes worked on during the Student's "Community Living" class. The Student receives support on spelling skills with support from an Instructional Assistant and Special Education Teacher. The instruction that is delivered to the Student is appropriate and tailored to the Student's skill level and English IEP goal. The Department does not substantiate the allegation that instruction provided to the Student in Spelling denied the Student a FAPE.</p> <p>The Student's IEP addresses Transition Services for the Student, including training and education to assist in the Student's transition to life after graduation. The Transition Services being provided to the</p>
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	<p>Relevant Law: 34 § CFR 300.101 and OAR 581-015-2040; 34 CFR § 300.320 and OAR 581-015-2200.</p>	<p>Student are appropriate in light of the Student's present levels, as reflected in the Student's current IEP. The District and a Transition Facilitator met to explore programs to assist the Student in the transition from high school to the "real world." The Department does not substantiate the allegation that the District failed to provide adequate Transition Services to the Student.</p>
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<p><b><u>Proposed Corrective Action:</u></b></p> <p>The Complaint did not request specific Corrective Action.</p>	<p>The Department does not order any Corrective Action in this case.</p>
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### III. FINDINGS OF FACT

1. The Student in this case is eighteen years old and attends twelfth grade at a high school in the Riddle School District (District). The Student is eligible for Special Education under the disability category of Orthopedic Impairment (OI).
2. The Student's current IEP is dated September 7, 2017. On November 9, 2017, the Student's IEP Team amended the Student's IEP, but only to clarify school employee supervision and assistance for the Student when leaving school grounds.
3. The Student's IEP states that the Student's anticipated graduation date is June 30, 2018 with an Extended Diploma. The Student's IEP notes that the student is friendly and willing to ask for help when frustrated. The Student's Present Levels of Academic Achievement and Functional Performance describe the Student as focusing on functional mathematics involving calculations of money and time. As to reading, the Student's reading fluency and comprehension is tested at the fifth grade level. The IEP Team states that the Student's "physical disability will make it difficult . . . to have the same speed and output in written responses as . . . general education peers," most specifically because of fine and gross motor skill limitations.
4. The Student's IEP contains six goals, in the areas of English, Life Skills/Transition, Math, Adaptive/Self Management, Social Skills, and Public Transportation.
5. The Student receives Specially Designed Instruction (SDI) in Social Skills, Functional Academics, Life Skills, and Reading. The Student also receives related services of Occupational Therapy and Physical Therapy. District staff provide the Student with accommodations such as breaks, repeat/clarification of directions, the use of a word processor, class notes, and written and visual instructions.

6. The Student's IEP also notes that the Student's academic program is modified to include "alternate assignments shortened to show understanding," and also that the Student is to receive notes on tests and quizzes. The IEP Team selected a placement of "[f]ull time attendance with 4 out of 7 classes in a specialized setting."
7. The Student attends a general education Science class with approximately seven other students. The Student participates in classroom discussions and the teacher uses a computer to present visual presentations for all the students in the classroom—including the Student. The teacher occasionally uses "hands on" objects for the Students. Some of the classroom discussions are beyond the comprehension of the Student, but the Student actively participates in discussions when able. The teacher pairs the Student with a particular peer for experiments under the teacher's supervision. The Science Teacher is familiar with the provisions of the Student's IEP and focuses on the modifications and accommodations in the Student's IEP during discussion of the projects. This includes the use of oral exams for the Student. The Student is graded primarily on participation.
8. The Student's "Geography – Other (Art)" class explores regions and culture through arts and crafts projects. This is a general education class attended by approximately eleven students, and is staffed by a teacher and an Instructional Assistant (IA). The IA assists the Student with art projects when the Student requires assistance. For example, the IA will assist the Student by holding materials or by cutting out a difficult pattern. The District provides the Student with adaptive tools for this class, such as an incline board, adaptive scissors, large and small pencils with a choice of grips, large grip paint brushes, and markers and color pencils of different sizes. During a needlepoint project, the teacher provided a longer needle and a pattern on plastic with larger holes in the plastic. The teacher reported that the Student is creative and often completes projects early. The Student is graded on effort exerted to recreate the arts and crafts of the region or culture being studied. On one occasion, the Student's Parent observed the Student in the classroom and remarked that the IA did not assist the Student, who was not working for a period of twenty minutes. The Student's teacher observed that the Student is less social and more reserved when the Parent is in the classroom.
9. The Student's Social Studies class is taught in the Special Education Resource Room. The Social Studies regular education teacher and the Special Education Teacher selected an instructional program designed for students with the Student's skill level, which is delivered at approximately a fifth grade level. The program is provided in written format and kept in a notebook/binder. An IA provides the instruction to the Student and two other students at similar skill levels. The students and the IA take turns reading portions of the program. The IA brings presentation materials to this class, such as a map, and uses a highlighter to emphasize key words in the lessons. The Student has made academic progress in Social Studies over the course of the school year. The IA noted that when the Student's Parent observes the room, the Student is not as involved with the school work, as the Student's attention is drawn to the Parent.
10. The Student attends a Consumer Math class, which is taught in the Special Education Resource Room. The objective of the class is to deliver to the Student specially designed instruction in Functional Academics and Life Skills/Transition. The class content focuses on exercises calculating time and money. The instruction is mostly delivered orally, with

some instruction delivered through individual work sheets. The Special Education Teacher chooses the instruction, which is modified to the Student's skill level and delivered by an IA in a small group consisting of the Student and one other student. The Student has already completed the math requirements for an extended diploma.

11. The Student attends a general education Leadership class. This class involves working on projects at the school and in the community. The teacher generally pairs up with the Student during the class, and only occasionally is another student paired with the Student. Additionally, the teacher has an IA available to assist when the class goes into the community, as this has occurred a few times. The Student assisted with developing a mission statement for the class and with school fundraising activities. The Student's Parent contends that the Student does not do anything in Leadership class "at least 90% of the time."
12. The Student attends a general education Industrial Arts class with a total of three students. The number of projects completed in the class depends on the project's complexity. The Student has successfully completed several projects, including a bookshelf, signs, airplanes and a shelf for power tools. The teacher assists the Student with every aspect of every project, which includes sanding, painting, staining, and the use of a table saw, scroll saw, and sliding compound miter saw. Occasionally, the Student will report that the Student is exhausted or experiencing pain, and will not want to enter the workshop. On those days, the teacher allows the Student to work on drawing plans for projects and will allow the Student to read. In early January of 2018, the Student observed the teacher playing a game called "Hearts" on the teacher's computer, and the Student asked to learn this game. The teacher, aware of the provisions of the Student's IEP concerning social skills, worked one-on-one with the Student to teach the game to the Student and this provided an opportunity to work on social skills with the teacher. This continued for a "couple of weeks," after which the Student brought in a picture of a shelf for power tools, and the Student began work on that project. According to the Industrial Arts teacher, the Student has completed as many, if not more, projects than students in the teacher's other classes throughout the school day.
13. The Student attends a Community Living class, which is taught in the Special Education Resource Room. The class focuses on skill development to assist students with transitioning to life after graduation. The class focuses on functional skills such as comprehending public bus schedules, determining the costs of items, calculating time, and considering decisions such as where to live after finishing high school. The Student participates in the class and desires to find a roommate to live with in Roseburg after graduation. In this class, the Student also works on spelling packets in the Community Living class, receiving support from an IA and Special Education Teacher.
14. The Student's current IEP contains a section dedicated to "Transition Planning." The Student participated in transition assessments, including the CIS Interest Profiler and in-school interviews, wherein the Student expressed an interest in working at a movie theater. The IEP developed a post-secondary goal where the Student "will work at a movie theater within 3 months of graduation." District staff repeatedly and independently noted the Student's passion for movies. The Student met with a Transition Facilitator near the end of January 2018. Several programs were discussed, including a Vocational Rehabilitation program and a "CLCM (Community Living Case Management) program," offered by the



State's Department of Human Services. It is reported that the Student's Parent would not agree to the programs offered.

15. The Student's current IEP contains goals oriented toward "Money Skills" and "Social Skills" to assist the Student with transition out of a school setting. The noted objectives of the Student's courses were so the Student could become more independent, communicate feelings to others, respond appropriately in a job setting, and improve math skills with respect to time and money.

#### **IV. DISCUSSION**

##### **1. FAPE; Content of IEP**

The Complaint alleges that the District violated the IDEA by failing to deliver appropriate specially designed instruction (SDI) modified to the Student's individual needs, and as such, failed to provide the Student with a free, appropriate public education (FAPE). For a school district to meet its substantive obligation under the IDEA, a school district must "offer an IEP reasonably calculated to enable a child to make progress appropriate in light of the child's circumstances."<sup>2</sup> An IEP team convenes to determine whether specially designed instruction must be delivered to a student for that student to receive a FAPE. Specially designed instruction means "adapting, as appropriate to the needs of an eligible child under this part, the content, methodology, or delivery of instruction—(i) To address the unique needs of the child that result from the child's disability; and (ii) To ensure access of the child to the general curriculum, so that the child can meet the educational standards within the jurisdiction of the public agency that apply to all children."<sup>3</sup>

##### **A. Science**

The Complaint alleges that the District has failed to provide FAPE by failing to provide appropriate SDI in the Student's Science class at the Student's "comprehension and skill level." The Student's current IEP does not contain a Science goal. The Student receives science instruction primarily through the use of "hands on" objects and visuals projected through a computer. The Student has the opportunity to participate in this general education class, instruction is delivered consistent with the Student's IEP. The Science Teacher modifies the Student's curriculum by pairing the Student with another student for purposes of conducting science experiments, and by delivering exams orally. The small number of students in this class allows ample opportunity for the Student to participate in the instruction being presented visually—a manner designed to be accessible for the Student. The Student's Science Teacher reports that the Student has made academic progress in class, chiefly observed through the Student's increased participation in class.

The Department does not substantiate the allegation that the instruction provided to the Student in the Student's Science class denied the Student a FAPE.

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<sup>2</sup> *Endrew F. v. Douglas County Sch. Dist. Re-1*, 137 S.Ct. 988, 999 (2017).

<sup>3</sup> 34 C.F.R. 300.39(b)(3).

## **B. Geography – Other (Art)**

The Complaint alleges that the District has failed to provide FAPE by failing to provide appropriate SDI and Related Services, including “tools, adaptable equipment” to accommodate the Student’s disability in the Student’s Geography – Other (Art) class. The Student’s current IEP does not contain a Geography – Other (Art) goal. The Student’s “Geography – Other (Art)” class explores regions and culture through arts and crafts projects. This is a general education class attended by approximately eleven students, and is staffed by a teacher and an Instructional Assistant (IA). The IA assists the Student with art projects when the Student requires assistance. For example, the IA will assist the Student by holding materials or by cutting out a difficult pattern. The District provides the Student with adaptive tools for this class, such as an incline board, adaptive scissors, large and small pencils with a choice of grips, large grip paint brushes, and markers and color pencils of different sizes. During a needlepoint project, the teacher provided a longer needle and a pattern on plastic with larger holes in the plastic. The Student is creative, often completes projects early, and has made academic progress in class.

On one occasion, the Student’s Parent observed the Student in the classroom and remarked that the IA did not assist the Student, who was not working for a period of twenty minutes. The Student’s teacher observed that the Student is less social and more reserved when the Parent is in the classroom.

The Department does not substantiate the allegation that the instruction provided to the Student in the Student’s Geography – Other (Art) class was not properly accommodated, nor that denied the Student a FAPE.

## **C. Social Studies**

The Complaint alleges that the District has failed to provide FAPE by failing to provide appropriate instruction in the Student’s Social Studies class. The Student’s current IEP does not contain a Social Studies goal. The Social Studies general education teacher and the Special Education Teacher selected an instructional program designed for the Student’s skill level, which is delivered at approximately a fifth grade level. The program is provided in written format and kept in a notebook/binder. An IA provides the instruction to the Student and two other students at similar skill levels. The students and the IA take turns reading portions of the program. The IA brings maps and other presentation materials to this class, and uses a highlighter to emphasize key words in the lessons. The IA consistently provides consistent instruction and supervision to the Student and the two other classmates. The Student has made academic progress in Social Studies over the course of the school year.

The Department does not substantiate the allegation that the instruction provided to the Student in the Student’s Social Studies class denied the Student a FAPE.

## **D. Consumer Math**

The Student attends a Consumer Math class, which is taught in the Special Education Resource Room. The Student has already completed the math requirements for an extended diploma. The objective of the class is to deliver to the Student specially designed

instruction in Functional Academics and Life Skills/Transition that aligns with the Student's Life Skills/Transition and Math IEP goals. The class content focuses on exercises calculating time and money. The instruction is mostly delivered orally, with some instruction delivered through individual work sheets. The Special Education Teacher chooses the instruction, which is modified to the Student's skill level and delivered by an IA in a small group consisting of the Student and one other student. The Student has made academic progress in this class, as evidenced by teacher report and written progress reports.

The Department does not substantiate the allegation that the instruction provided to the Student in the Student's Consumer Math class denied the Student a FAPE.

#### **E. Leadership**

The Complaint alleges that the District failed to provide FAPE by not providing any direction or appropriate instruction in the Student's general education Leadership class. The Student's current IEP does not contain a Leadership goal. The Leadership class involves working on projects at the school and in the community. The Leadership teacher generally pairs up with the Student during the class, only occasionally is another student paired with the Student. Additionally, the teacher has an IA available to assist when the class goes into the community, as this has occurred a few times. The Student assisted with developing a mission statement for the class and with school fundraising activities. Over the course of the year, the Student's participation and social interaction with staff and other students has improved and increased.

The Department does not substantiate the allegation that the instruction provided to the Student in the Student's Leadership class denied the Student a FAPE.

#### **F. Industrial Arts**

The Complaint alleges that the District failed to provide FAPE by failing to provide appropriate instruction and by failing to provide specific projects without the Parent directing projects in the Industrial Arts class. The Student's current IEP does not contain an Industrial Arts goal. The Industrial Arts Teacher modified the Student's curriculum, achieving a balance between assisting with tasks unsafe for the Student and allowing the Student to perform tasks with less assistance. The Student has successfully completed five to seven projects, including a bookshelf, signs, airplanes and a shelf for power tools. The Industrial Arts Teacher assists the Student with every aspect of every project, which includes sanding, painting, staining, and the use of a table saw, scroll saw, and sliding compound miter saw.

When the Student expresses exhaustion or pain, the teacher and Student play a game on the computer in an effort to address the social skills goal in the Student's IEP. The Student's program in Industrial Arts is appropriately modified. The Student has made academic progress in Industrial Arts.

The Department does not substantiate the allegation that instruction provided to the Student in "Woodshop" denied the Student a FAPE.

## **G. Spelling**

The Complaint alleges that the District failed to provide FAPE by failing to provide appropriate instruction and by failing to provide sufficient staff to instruct the Student in the Student's Spelling class. The Student is not enrolled in a Spelling class. The Student has an English IEP goal that includes a spelling component, and the Student also receives SDI in the area of Functional Academics and Reading. The Student's English goal, which focuses on reading comprehension, language fluency, and writing (including spelling), is addressed in assignments the Student works on in different classes throughout the day. Furthermore, the Student's Community Living class is where the Student spent time working on spelling packets and receives assistance from an IA and Special Education Teacher.

The Student's testing results have revealed that the Student made appropriate progress on the Student's English IEP goal in the areas of reading comprehension, reading fluency, and writing multi-sentence paragraphs.

The Department does not substantiate the allegation that instruction provided to the Student in Spelling denied the Student a FAPE.

## **2. Transition Services**

The Complaint alleges that the District has failed to provide adequate Transition Services to the Student to prepare the Student for the "real world." Transition Services focus on "improving the academic and functional achievement of the child with a disability to facilitate the child's movement from school to post-school activities" such as postsecondary education, employment, and independently living, and which are "based on the individual child's needs, taking into account the child's strengths, preferences, and interests . . . ."<sup>4</sup>

The Student's current IEP contains a section dedicated to "Transition Planning." The Student participated in transition assessments, including the CIS Interest Profiler and in-school interviews, wherein the Student expressed an interest in working at a movie theater. The IEP developed a post-secondary goal where the Student "will work at a movie theater within 3 months of graduation." District staff repeatedly and independently noted the Student's passion for movies. The Student met with a Transition Facilitator near the end of January, 2018. Several postsecondary programs were discussed, including a Vocational Rehabilitation program and a "CLCM (Community Living Case Management) program", offered by the state's Department of Human Services.

Additionally, the Student's current IEP contains goals oriented toward "Money Skills" and "Social Skills" to assist the Student with transition out of a school setting. The noted objectives of the Student's courses were so the Student could become more independent, communicate feelings to others, respond appropriately in a job setting, and improve math skills with respect to time and money. The Student is also receiving instruction in the area of functional skill development in a Community Living class. In this course, the Student receives instruction on decoding a public bus schedule, determining the costs of items, calculating time, and considering decisions such as where to live after finishing high school.

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<sup>4</sup> 34 C.F.R. § 300.43(a); OAR 581-015-2200(2).

The District has provided the Student with services to focus on academic and functional achievement to facilitate the Student's movement from school to the "real world," based on the Student's abilities, preferences, and interests.

The Department does not substantiate the allegation that the District failed to provide adequate Transition Services to the Student.

**CORRECTIVE ACTION<sup>5</sup>**  
*In the Matter of Riddle School District*  
Case No. 18-054-018

The Department orders no Corrective Action in this matter.

Dated this 4th Day of May, 2018



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Sarah Drinkwater, Ph.D.  
Assistant Superintendent  
Office of Student Services

Mailing Date: May 4, 2018

Appeal Rights: Parties may seek judicial review of this Order. Judicial review may be obtained by filing a petition for review within sixty days from the service of this Order with the Marion County Circuit Court or with the Circuit Court for the County in which the party seeking judicial review resides. Judicial review is pursuant to the provisions of ORS § 183.484. (OAR 581-015-2030 (14).)

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<sup>5</sup> The Department's order shall include any necessary corrective action as well as documentation to ensure that the corrective action has been completed (OAR 581-015-2030(13)). The Department expects and requires the timely completion of corrective action and will verify that the corrective action has been completed as specified in any *final* order (OAR 581-015-2030(15)). The Department may initiate remedies against a party who refuses to voluntarily comply with a plan of correction (OAR 581-015-2030(17) & (18)).