

**New Jersey Department of Education
Special Education Receiving School Monitoring**

Receiving School: Brookfield Schools **County:** Camden

Monitoring Dates: December 2-4, 2002

Monitoring Team: Catherine Thomas, Deborah Magee, Judyth Vazquez, and Elaine Lerner

Background Information:

During the 2001–2002 school year, the Brookfield Schools (Brookfield Academy, Brookfield Elementary, and Brookfield Academy – Transition to College) conducted a self-assessment of policies, procedures, programs, services, and student outcomes. This self-assessment component of the monitoring process provided the Brookfield Schools with an opportunity to evaluate its strengths and areas of need with regard to:

- The provision of a free, appropriate public education (FAPE) for students with disabilities in the least restrictive environment;
- The development and implementation of policies and procedures resulting in procedural compliance; and
- The organization and delivery of programs and services to meet the needs of the students with disabilities.

The self-assessment was designed to identify areas of strength, promising practices, areas that need improvement and areas that may be noncompliant with state and federal requirements. The Brookfield Schools developed an improvement plan to address identified areas of need.

The New Jersey Department of Education (NJDOE) conducted an on-site monitoring to verify the self-assessment findings, to assess the appropriateness of the improvement plan, and to determine the progress in implementing the plan.

During the monitoring process, the monitoring team reviewed receiving school documents such as policies and procedures, student records from sending districts, lesson plans, services as indicated in Individualized Education Programs (IEPs), staff evaluations, student count information, master student lists, class lists, schedules of students/ teachers/related service personnel, and other relevant information. Interviews were conducted with the receiving school's special education administrators, building principals, special education teachers and related service personnel.

School Strengths:

The Brookfield Schools are commended for offering additional days in the school calendar to enable students to make up missed instruction due to absence or suspensions.

Brookfield Academy is commended for its strong therapeutic program, administered by a highly skilled and dedicated staff. Brookfield Academy offers career awareness programs in culinary arts, nail technology, and a media program in-house cable television program for students and staff. These programs not only give students an introduction to these fields, but they provide instruction on appropriate work ethics and proper decorum in the workplace. Brookfield School's Transition to College Program,

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located on the campus of the Camden County Community College, is commended for preparing a number of students to enroll as full-time students.

Brookfield Elementary is also commended for providing parents with monthly evening parent seminars that provide support and information.

Areas Demonstrating Compliance With All Standards

Staff Requirements were determined to be areas of compliance by Brookfield Academy during self-assessment and by the NJDOE during the on-site visit.

Staff Requirements were determined to be areas of compliance by Brookfield Elementary during self-assessment and by the NJDOE during the on-site visit.

FAPE, Staff Requirements, IEP, and Discipline were determined to be areas of compliance by the Brookfield Academy- Transition to College Program during self-assessment and by the NJDOE during the on-site visit.

Section I: General Provisions

Summary of Findings:

During self-assessment the **Brookfield Schools** accurately identified themselves compliant in the areas of annual reports, amendments and provision of programs in nonsectarian settings.

During the self-assessment process, the **Brookfield Schools** identified concerns in the areas of policies and procedures relating to joint training of staff and parents. **The schools' improvement plans are insufficient to address these areas of need because they lack sufficient activities, identification of persons responsible, projected timelines and documentation of compliance or improvement** The schools' improvement plans must be revised to include these components.

During the self-assessment process, **Brookfield Academy** and **Brookfield Elementary** identified concerns in the area of having IEPs in effect prior to the delivery of services. **The schools' improvement plans are insufficient to address these areas of need because they lack sufficient activities and documentation of compliance or improvement.** The schools' improvement plans must be revised to include these components.

No additional areas of need were identified during the on-site visit.

Section II: Free, Appropriate Public Education (FAPE)

Brookfield Academy

Summary of Findings:

During self-assessment **Brookfield Academy** accurately identified themselves compliant in the areas of length of school day/year, physical education, hearing aids, services at no cost to parents and the provision of extended school year programs and related services.

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During the self-assessment process, **Brookfield Academy** identified concerns in the area of observation of programs. The school's improvement plan is sufficient to address this area of need.

An additional area of need for **Brookfield Academy** was identified during the on-site visit regarding IEP implementation.

IEP Implementation - During the on-site visit, through a review of IEPs and the staff interview process, it was determined the school does not consistently provide the services required by the IEP during the first 30 days of a student's placement. Instead, services are provided in accordance with the program model implemented at the school. Together with the school district, the school convenes an IEP meeting after a 30-day period with all the required participants and aligns the students' program in accordance with its program model.

- **The school will revise its improvement plan to include procedures to ensure it provides services required by a student's IEP from the date of enrollment. In the event that the student requires services that are different from those specified in the IEP, an IEP meeting must be convened by the sending district to address these service needs. The plan must also include procedures to collaborate with the district prior to admission to make any required changes to the IEP. The improvement plan must include an administrative oversight component to ensure the consistent, compliant implementation of the procedures.**

Brookfield Elementary

Summary of Findings:

During self-assessment, **Brookfield Elementary** accurately identified themselves compliant in the areas of length of school day/year, physical education, hearing aids, services at no cost to parents and the provision of extended school year programs and observation of programs.

During the self-assessment process, **Brookfield Elementary** identified concerns in the area of provision of services and related services as required by IEP. **The school's improvement plan is insufficient to address these areas of need because it lacks sufficient activities, projected timelines and documentation of compliance or improvement.** The school's improvement plan must be revised to include these components.

An additional area of need for **Brookfield Elementary** was identified during the on-site visit regarding IEP implementation.

IEP Implementation - During the on-site visit, through a review of IEPs and the staff interview process, it was determined the school does not consistently provide the services required by the IEP during the first 30 days of a student's placement. Instead, services are provided in accordance with the program model implemented at the school. Together with the school district, the school convenes an IEP meeting after a 30-day period with all the required participants and aligns the students' program in accordance with its program model.

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- **The school will revise its improvement plan to include procedures to ensure it provides services required by a student’s IEP from the date of enrollment. In the event that the student requires services that are different from those specified in the IEP, an IEP meeting must be convened by the sending district to address these service needs. The plan must also include procedures to collaborate with the district prior to admission to make any required changes to the IEP. The improvement plan must include an administrative oversight component to ensure the consistent, compliant implementation of the procedures.**

Section IV: Facility Requirements

Brookfield Academy

Summary of Findings:

During self-assessment, **Brookfield Academy** accurately identified themselves compliant in the areas of programs provided in approved facilities, and a certificate of occupancy was presented.

During the self-assessment process, **Brookfield Academy** identified concerns in the areas of fire drills. The school’s improvement plan is sufficient to address this area of need. During the on-site visit, a review of records and staff interviews indicated that the receiving school has appropriately implemented specific activities to bring about correction in this area.

Brookfield Elementary

Summary of Findings:

During self- assessment, **Brookfield Elementary** accurately identified themselves compliant in the areas of programs provided in approved facilities, certificate of occupancy and fire drills.

Brookfield Academy Transition to College

Summary of Findings:

During self-assessment, **Brookfield Academy-Transition to College** accurately identified themselves compliant in the areas of programs provided in approved facilities and having a certificate of occupancy.

During the self-assessment process, **Brookfield Academy-Transition to College** identified concerns in the areas of fire drills. The school’s improvement plan is sufficient to address this area of need. During the on-site visit, a review of records and staff interviews indicated that the receiving school has appropriately implemented specific activities to bring about correction in this area.

An additional area of need was identified during the on-site visit regarding updated fire certificates for all **Brookfield Schools**.

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Area of Need:

Fire Certificate- During the on-site visit, a review of records none of the **Brookfield Schools** have current fire certificates.

- **The Brookfield Schools will immediately obtain current fire certificates. In addition, the schools will revise their improvement plan to include procedures to ensure that fire certificates are obtained in a timely manner and maintained at each school. The improvement plan must also include an administrative oversight component to ensure implementation of the procedures.**

Section V: Individualized Education Plan/Annual Review

Summary of Findings:

Brookfield Academy

During self-assessment, **Brookfield Academy** accurately identified themselves compliant in the areas of IEP meeting conducted at least annually, IEP meeting conducted with appropriate participants, signatures present on IEPs, communication with sending districts regarding missing IEP components, IEP accessibility, inform teachers/providers of IEP responsibilities, no delay in implementation, observation of proposed placement, statewide testing and progress reports.

During the self-assessment process, **Brookfield Academy** identified concerns in the areas of implementation of IEP components. The school's improvement plan is sufficient to address this area of need. During the on-site visit, a review of records indicated that the receiving school has appropriately implemented specific activities to bring about correction in this area.

No additional areas of need were identified during the on-site visit.

Brookfield Elementary

Summary of Findings:

During self-assessment, **Brookfield Elementary** accurately identified themselves compliant in the areas of IEP meeting conducted at least annually, IEP meeting conducted with appropriate participants, signatures present on IEPs, communication with sending districts regarding missing IEP components, IEP accessibility, inform teachers/providers of IEP responsibilities, no delay in implementation, observation of proposed and statewide testing.

During the self-assessment process, **Brookfield Elementary** identified concerns in the areas of implementation of IEP components and progress reports. **The school's improvement plan is insufficient to address these areas of need because lacks sufficient activities, documentation of improvement and an administrative oversight component to ensure consistent implementation of the procedures** The school must revise its improvement plan to include these components.

No additional areas of need were identified during the on-site visit.

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Section VI: Discipline

Brookfield Academy

Summary of Findings:

During self-assessment, **Brookfield Academy** accurately identified themselves compliant in the areas of standard disciplinary procedures, changes to program/placement, suspensions and interim alternative educational settings and termination of students.

During the self-assessment process, **Brookfield Academy** identified concerns in the areas of written procedures for the use of time-out rooms, aversive therapies and removal of students. **The school has developed an improvement plan that is inappropriate to address the use of time-out rooms and aversive therapies because the improvement plan addresses areas that are contrary to the disciplinary policies and procedures submitted by the school.** The improvement plan must not conflict with Brookfield Academy's program model and policies and procedures. The school has developed an improvement plan to address the area of restraints, removal of student, changes to program/placement and termination of students that is sufficient to address these areas of need.

No additional areas of need were identified during the on-site visit.

Brookfield Elementary

Summary of Findings:

During self-assessment, **Brookfield Elementary** accurately identified themselves compliant in the areas of standard disciplinary procedures, interim alternative educational settings, suspensions and termination of students.

During the self-assessment process, **Brookfield Elementary** identified concerns in the areas of written procedures for the use of time-out rooms and aversives, removal of students, and changes to program/placement. **The school's improvement plan for the use of time-out rooms, restraints and aversives is insufficient because it lacks training activities, persons responsible and administrative oversight components to ensure implementation of the procedures** The school's improvement plan for the areas of removal of students and changes to program/placement is insufficient because it lacks specific activities, staff training, persons' responsible and an administrative oversight component to ensure consistent implementation of the procedures. The improvement plan must be revised to include these components.

No additional areas of need were identified during the on-site visit.

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Section VII: Programs and Services

Summary of Findings:

Brookfield Academy

During self-assessment **Brookfield Academy** accurately identified themselves compliant in the areas of class size/age range, exceptions, descriptions of special class programs and certifications.

During the self-assessment process, **Brookfield Academy** identified concerns in the areas of core curriculum content standards, home instruction, dispensing medication, medical services and medical examinations. The school's improvement plan for the areas of core curriculum content standards and home instruction is sufficient to address these areas of need. The school's improvement plan for the areas of nursing and medical services is insufficient to address these areas of need because the guidelines book presented during the on-site visit did not comply with all requirements of N.J.A.C 6A:16. The county office of education will contact the school to review the required revisions to their guidelines book.

No additional areas of need were identified during the on-site visit.

Summary of Findings:

Brookfield Elementary

During self-assessment **Brookfield Elementary** accurately identified themselves compliant in the areas of class size/age ranges, description of special class program, certification, special classes implementing IEPs, Core Curriculum Content Standards (CCCSs), and home instruction.

During the self-assessment process, **Brookfield Elementary** identified concerns in the areas of dispensing medication and medical services. **The school's improvement plan is insufficient to address this area of need because it lacks appropriate activities, staff training, and an administrative oversight component to ensure consistent implementation of the procedures.** The school's improvement plan must be revised to include these components.

No additional areas of need were identified during the on-site visit.

Summary of Findings:

Brookfield Academy-Transition to College

During self-assessment **Brookfield Academy-Transition to College** accurately identified themselves compliant in the areas of class size/age range, exceptions, description of special class programs, certifications, special classes, implementing IEP, CCCSs, and home instruction.

During the self-assessment process, **Brookfield Academy-Transition to College** identified concerns in the areas of nursing and medical services. The school has developed an improvement plan that is sufficient to address these areas of need.

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No additional areas of need were identified during the on-site visit.

Section VIII: Student Records

Brookfield Academy

Summary of Findings:

During self-assessment **Brookfield Academy** accurately identified themselves compliant in the areas of conformance to pupil record code, return of records, access to records, access sheets, daily attendance, tardiness/absences, written notice of student attendance and student health records.

During the self-assessment process, **Brookfield Academy** identified concerns in the areas of location of records. The school has developed an improvement plan that is sufficient to address this area of need. During the on-site visit, a review of records indicated that the receiving school has appropriately implemented specific activities to bring about correction in this area.

No additional areas of need were identified during the on-site visit.

Brookfield Elementary

Summary of Findings:

During self-assessment **Brookfield Elementary** accurately identified themselves compliant in the areas of conformance with pupil record code, return of records, access sheets, daily attendance, tardiness/ absences and written notice of attendance.

During the self-assessment process, **Brookfield Elementary** identified concerns in the areas of access to records, location of records and student health records. **The school has developed an improvement plan that is insufficient to address these areas of need because it lacks appropriate activities, procedures and staff training to ensure compliance in these areas.** The improvement plan must be revised to include these components.

No additional areas of need were identified during the on-site visit.

Brookfield Academy- Transition to College

Summary of Findings:

During self-assessment **Brookfield Academy- Transition to College** accurately identified themselves compliant in the areas of conformance with pupil record code, return of records, access sheets, daily attendance, tardiness/ absences and written notice of attendance.

An additional area of need was identified during the on-site visit regarding location of records.

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Location of Records- During the on-site visit, through record reviews and interviews it was determined that the student records did not contain a notation as to the location of other copies of the file.

- **The school will revise its improvement plan to include procedures and an administrative oversight component to ensure consistent implementation of the procedures.**

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Summary

The receiving school is commended for the comprehensive review conducted during the self-assessment process. As a result of that review, the receiving school was able to identify areas of need and develop an improvement plan that with some revision will bring about systemic change. The receiving school is further commended for the many areas determined by the receiving school and verified by the Department of Education as compliant with federal and state statutes and regulations.

On-site special education monitoring was conducted in the Brookfield Schools on December 2, 3, 4, 2002. The purpose of the monitoring visit was to verify the Brookfield School's report of findings resulting from their self-assessment and to review the receiving school's improvement plan.

Brookfield Schools

Areas identified as consistently compliant by all **Brookfield Schools** during self-assessment and verified during the on-site monitoring visit included annual reports, amendments and provision of programs in nonsectarian settings.

During the self-assessment process, all **Brookfield Schools** identified concerns in the areas of policies and procedures relating to joint training of staff and parents.

Brookfield Academy

Areas identified as consistently compliant by **Brookfield Academy** during self-assessment and verified during the on-site monitoring visit included staff requirements, length of school day/year, physical education, hearing aids, services at no cost to parents, the provision of extended school year and related services, programs provided in approved facilities, certificate of occupancy, IEP meeting conducted at least annually, IEP meeting conducted with appropriate participants, signatures present on IEPs, communication with sending districts regarding missing IEP components, IEP accessibility, inform teachers/providers of IEP responsibilities, no delay in implementation, observation of proposed placement, statewide testing, progress reports, standard disciplinary procedures, changes to program/placement, suspensions and interim alternative educational settings, termination of students, class size/age range, exceptions, descriptions of special class programs and certifications, conformance to pupil record code, return of records, access to records, access sheets, daily attendance, tardiness/absences, written notice of student attendance and student health records.

During the self-assessment process, Brookfield Academy identified areas of need regarding: having IEPs in effect prior to the delivery of services, observation of programs, fire drills, implementation of IEP components, written procedures for the use of time-out rooms, and removal of students, core curriculum content standards, home instruction, dispensing medication, medical services and medical examinations, and location of records.

The on-site visit identified additional areas of need within the various standards regarding: IEP implementation, and updated fire certificates.

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Brookfield Elementary

Areas identified as consistently compliant by **Brookfield Elementary** during self-assessment and verified during the on-site monitoring visit included: staff requirements, length of school day/year, physical education, hearing aids, services at no cost to parents, the provision of extended school year and observation of programs, programs provided in approved facilities, certificate of occupancy, fire drills, IEP meeting conducted at least annually, IEP meeting conducted with appropriate participants, signatures present on IEPs, communication with sending districts regarding missing IEP components, IEP accessibility, inform teachers/providers of IEP responsibilities, no delay in implementation, observation of proposed program, statewide testing, standard disciplinary procedures, interim alternative educational settings, suspensions and termination of student, standard disciplinary procedures, interim alternative educational settings, class size/age ranges, description of special class program, certification, special classes implementing IEPs, Core Curriculum Content Standards, home instruction, conformance with pupil record code, return of records, access sheets, daily attendance, tardiness/ absences and written notice of attendance. conformance with pupil record code, return of records, access sheets, daily attendance, tardiness/ absences and written notice of attendance

During the self-assessment process, **Brookfield Elementary** identified areas of need regarding: having IEPs in effect prior to the delivery of services, implementation of IEP components, progress reports, written procedures for the use of time-out rooms and aversives, removal of student, changes to program/placement, dispensing medication, medical services, access to records, location of records and student health records.

The on-site visit identified additional areas of need within the various standards regarding: IEP implementation, and updated fire certificates.

Brookfield Academy- Transition to College

Areas identified as consistently compliant by the **Brookfield Academy- Transition to College** during self-assessment and verified during the on-site monitoring visit included: FAPE, Staff Requirements, IEP, and Discipline, having programs provided in approved facilities, having a certificate of occupancy, class size/age range, exceptions, description of special class programs, certifications, special classes, implementing IEP, CCCSs, home instruction, conformance with pupil record code, return of records, access sheets, daily attendance, tardiness/ absences and written notice of attendance.

During the self-assessment process, the **Brookfield Academy- Transition to College** identified areas of need regarding fire drills, nursing and medical services.

The on-site visit identified additional areas of need within the various standards regarding updated fire certificates and location of records.

The requirement to obtain updated fire certificates requires immediate action on the part of all the **Brookfield Schools**. The **Brookfield Schools** will revise and resubmit the improvement plan to the Office of Special Education Programs to address the remaining areas of need within forty-five days of receipt of the monitoring report.