Receiving School: YALE Schools

Counties: Atlantic, Burlington, Camden, Gloucester

Monitoring Dates: March 25 - April 10, 2003

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Background Information:

During the 2001–2002 school year, the YALE Schools (YALE-Cherry Hill, YALE North - Medford, YALE East-Northfield, YALE Southeast-Voorhees and YALE-Williamstown) conducted a self-assessment of policies, procedures, programs, services, and student outcomes. This self-assessment component of the monitoring process provided the YALE Schools with an opportunity to evaluate 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 YALE 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, related service personnel and school district case managers and administrators.

School Strengths:

The YALE Schools are commended for behavior management programming tailored to meet the needs of a variety of students with disabilities.

Northfield YALE is commended for its behavior program which includes a monthly recognition program for students. In addition, teachers are required to make at least one positive phone call home per student each month. An added strength is their collaboration with agencies such as probation officers, Division of Youth and Family Services, and the Atlantic County Youth Shelter in an effort to provide support to the students and families.

Areas Demonstrating Compliance With All Standards

Discipline was determined to be an area of compliance by all **YALE Schools** during self-assessment and by the NJDOE during the on-site visit.

Facility Requirements were determined to be an area of compliance by **YALE North- Medford**, during self-assessment and by the NJDOE during the on-site visit.

Student Records were determined to be areas of compliance by the YALE Southeast- Voorhees during self-assessment and by the NJDOE during the onsite visit.

Section I: General Provisions

YALE Schools

Summary of Findings:

During self-assessment, the **YALE Schools** accurately identified itself compliant in the areas of policies and procedures, annual reports, amendments and provision of programs in nonsectarian settings.

During the self-assessment process, the YALE Schools identified concerns in the area of in-service training needs. The schools' improvement plan for all sites (except for YALE Voorhees which provides training to staff and parents) is insufficient to address this area of need because it lacks activities to ensure that joint training activities to include parent training. The schools' improvement plan must be revised to include this component.

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

Section II: Free, Appropriate Public Education (FAPE)

YALE Schools

Summary of Findings:

During self-assessment, **YALE Schools** accurately identified itself compliant in the areas of physical education, hearing aids, services provided at no cost to parents, and observation of programs.

YALE Cherry Hill

Areas of need for **YALE Cherry Hill** were identified during the on-site visit regarding length of school day/year and the provision of related services.

Areas of Need:

Length of School Day/Year - During the on-site visit, through a review of the school calendar and staff interviews, it was determined that **YALE Cherry Hill** maintains a 180 day school year calendar with sixteen shortened school days. Since the minimum of four hours instructional time is not provided on these days, the school calendar falls short of the required minimum of 180 school days.

 The school will revise its improvement plan to include procedures to ensure that instruction is provided for a minimum of four hours during 180 days per school year. The improvement plan must include an administrative oversight component to ensure consistent implementation of the procedures.

Extended School Year (ESY) - During the on-site visit, through record reviews and staff interviews, it was determined that **YALE Cherry Hill** operates an extended school year program. It was further determined that the extended school year at **YALE Cherry Hill** has not been approved by the county office of education, as required.

 The school will revise its improvement plan to include procedures to ensure that the school applies for and receives approval of the extended school year program prior, through the county office of education. The plan must include an administrative oversight component to ensure consistent implementation of the procedures.

Provision of Related Services- During the on-site visit, through a review of records, service logs and IEPs, as well as staff interviews and classroom observations, it was determined that **YALE Cherry Hill** does not consistently provide related services as indicated in the IEPs. It was determined that the provision of occupational therapy, speech therapy and counseling services was delayed, in some cases by three to four weeks, at the beginning of the school year. During the school year, related services were not provided when related

services personnel were scheduled to conduct testing or prepare for annual review meetings.

 The school will revise its improvement plan to include procedures to ensure that students receive related services as indicated in IEPs. The plan must further address how districts will be notified that the required related services have not been provided and the arrangements made to provide compensatory services. The plan must include an administrative oversight component to ensure consistent implementation of the procedures.

YALE North - Medford

Summary of Findings:

During self-assessment, YALE North - Medford accurately identified itself compliant in the areas of length of day/year and provision of programs and services in accordance with IEPs.

YALE East - Northfield

Summary of Findings

During self-assessment, YALE East - Northfield accurately identified itself compliant in the area of extended school year programs.

Areas of need for YALE East - Northfield were identified during the on-site visit regarding length of school day/year, provision of services as indicated in IEPs and provision of related services.

Areas of Need:

Length of School Day/Year - During the on-site visit, through a review of the school calendar and staff interviews, it was determined that YALE East-Northfield maintains a 180 day school year calendar with sixteen shortened school days. Since the minimum of four hours instructional time is not provided on these days, the school calendar falls short of the required minimum of 180 school days.

The school will revise its improvement plan to include procedures to ensure it includes a minimum of four hours of instruction during a minimum of 180 school days per school year. The improvement plan must include an administrative oversight component to ensure consistent implementation of the procedures.

Provision of Services as Indicated in IEPs- During the on-site visit, through a review of records, service logs, IEPs, staff interviews and classroom observations, it was determined that YALE East - Northfield does not provide

speech therapy and counseling services as indicated in the IEPs. It was determined that staff does not consistently provide counseling and speech services at the start of the school year for new students, when the school routinely conducts new student assessments. In addition, **YALE East-Northfield** does not provide written notification to sending school districts when there is an interruption of speech services, due to unplanned administrative causes, such as frequent or long term absences by a staff member.

 The school will revise its improvement plan to include procedures to ensure that students consistently receive related services as indicated in IEPs. The plan must address how districts will be notified when related services are temporarily interrupted, including proposals for provision of compensatory services. The plan must include an administrative oversight component to ensure consistent provision of related services as required by student IEPs.

Provision of Related Services- During the on-site visit, through record reviews and staff interviews, it was determined that counseling services were not consistently provided by a school social worker, as indicated in the IEP.

 The school will revise its improvement plan to include procedures to ensure that related services are provided by the IEP designated service provider. The plan must include an administrative oversight component to ensure consistent implementation of the procedures.

YALE Southeast- Voorhees

An area of need for **YALE Southeast - Voorhees** was identified during the onsite visit regarding extended school year program.

Area of Need:

Extended School Year Program- During the on-site visit, through record reviews and interviews, it was determined that **YALE Southeast - Voorhees** is operating an extended school year program without receiving prior approval from the approval by the county office.

 The school will revise its improvement plan to include procedures to ensure that the school applies for and is granted approval to operate an extended school year program. The plan must include an administrative oversight component to ensure consistent implementation of the procedures.

YALE Williamstown

Summary of Findings

During self-assessment, **YALE Williamstown** accurately identified itself compliant in the area of extended school year programs.

Areas of need for **YALE Williamstown** were identified during the on-site visit regarding length of school day/year and provision of related services as per IEP.

Areas of Need:

Length of School Day/Year - During the on-site visit, through a review of the school calendar and staff interviews, it was determined that **YALE Williamstown** maintains a 180 day school year calendar with sixteen shortened school days. Since the minimum of four hours instructional time is not provided on these days, the school calendar falls short of the required minimum of 180 school days.

 The school will revise its improvement plan to include procedures to ensure it includes a minimum of four hours of instruction during a minimum of 180 school days per school year. The improvement plan must include an administrative oversight component to ensure consistent implementation of the procedures.

Provision of Related Services in Accordance with IEPs - During the on-site visit, through record reviews and staff interviews, it was determined that counseling services were not consistently provided by a school social worker, as required by the IEP.

 The school will revise its improvement plan to include procedures to ensure that related services identified in the IEP are provided by designated staff, as indicated in the IEP.

Section III: Staff Requirements

Summary of Findings:

YALE Schools

During self-assessment, the **YALE Schools** accurately identified themselves compliant in the areas of the use of physical therapy assistants and certified occupational therapy assistants, private school dual employment and having an approved professional development plan.

During the self-assessment process, the YALE Schools identified concerns in the area of job description of paraprofessionals. The schools' improvement plan is insufficient to address this area of need because it lacks procedures to ensure that job descriptions are submitted to the county

The plan must include an administrative oversight office annually. component to ensure timely submission of job descriptions to the county **office of education.** The plan must be revised to include this component.

Areas of Concern:

Staff Certification - An area of concern in the YALE Schools was identified during the on-site visit regarding certification. During record reviews and interviews, it was noted that a significant number of the teaching staff hold emergency certification. While this is not an area noncompliance, it does raise concerns. Students are referred to private schools for the disabled when their education needs cannot be met in their home district. Private schools should employ staff with training and expertise in working with students disabilities.

 The school will revise its improvement plan to address how the school will ensure that teachers obtain appropriate certification and include strategies to employ appropriately certified staff in the future. The plan must also include an administrative oversight component to ensure consistent implementation.

YALE Cherry Hill

Summary of Findings:

Areas of need for YALE Cherry Hill were identified during the on-site visit regarding criminal history verification.

Areas of Need:

Criminal History Verification- During the on-site visit, the school was unable to present written documentation that all currently employed persons have submitted to a criminal history review, as required.

 The school will immediately conduct criminal history verification or receive written permission for emergent hiring from the county superintendent for all staff members hired by the school after October 8, 1986. In addition, the school will revise its improvement plan to include procedures to ensure that all staff members employed by the school have completed the criminal history verification or that the school has received written permission from the county superintendent for emergent hiring, pending completion of the review. The plan must include procedures to ensure that written documentation of compliance with criminal history review requirements is maintained at the school. The plan must also include an administrative oversight component to ensure consistent implementation of the procedures.

YALE North-Medford

Summary of Findings:

During self-assessment, **YALE North-Medford** accurately identified itself compliant in the areas of certified/licensed staff.

Areas of need for **YALE North-Medford** were identified during the on-site visit regarding criminal history verification.

Areas of Need:

Criminal History Verification- During the on-site visit, through record reviews, it was determined that the school did not maintain documentation of criminal history verification for staff employed by the school.

• The school will immediately conduct criminal history verification or receive written permission for emergent hiring from the county superintendent for all staff members hired by the school after October 8, 1986. In addition, the school will revise its improvement plan to include procedures to ensure that all staff members employed by the school have completed the criminal history verification or that the school has received written permission from the county superintendent for emergent hiring, pending completion of the review. The plan must include procedures to ensure that written documentation of compliance with criminal history review requirements is maintained at the school. The plan must also include an administrative oversight component to ensure consistent implementation of the procedures.

YALE East- Northfield

Summary of Findings:

During the self-assessment process, the school accurately identified itself compliant in the area of criminal history verification.

Areas of need for **YALE East- Northfield** were identified during the on-site visit regarding certified/licensed staff.

Areas of Need:

Certified/Licensed Staff- During the on-site visit, through staff interviews and observations, it was determined that staff members who do not posses teacher of the handicapped certifications are instructing reading groups.

 The school will revise its improvement plan to include procedures to ensure that students are instructed by appropriately certified staff

members. The plan must include an administrative oversight component to ensure consistent implementation of the procedures.

YALE Southeast- Voorhees

Summary of Findings:

During the self-assessment process, the school accurately identified itself compliant in the areas of criminal history verification

An area of need for **YALE Southeast- Voorhees** was identified during the onsite visit regarding certified/licensed staff.

Area of Need:

Certified/Licensed Staff- During the on-site visit, thorough staff interviews it was determined that a staff member who does not hold supervisory certification is supervising certified teaching staff.

 The school will revise its improvement plan to include procedures to ensure that teachers are supervised by appropriately certified staff members. The plan must include administrative oversight component to ensure consistent implementation of the procedures.

YALE Williamstown

Summary of Findings:

During the self-assessment process, **YALE Williamstown** accurately identified itself compliant in the areas of certified/licensed staff.

Areas of need for **YALE Williamstown** were identified during the on-site visit regarding criminal history verification.

Areas of Need:

Criminal History Verification- During the on-site visit, through record reviews, it was determined that **YALE Williamstown** did not maintain documentation of criminal history verification for staff members employed by the school.

• The school will revise its improvement plan to include procedures to ensure that all staff members employed by the school after October 8, 1986 have completed the criminal history verification or that the school has received written permission from the county superintendent for emergent hiring, pending completion of the review. The plan must include procedures to ensure that written documentation of compliance with criminal history review requirements is maintained at the school. The plan must also include

an administrative oversight component to ensure consistent implementation of the procedures.

Section IV: Facility Requirements

YALE Cherry Hill

Summary of Findings:

During self-assessment, YALE Cherry Hill accurately identified itself compliant in the areas of programs provided in approved facilities and certificates of occupancy and inspections.

An area of need was identified for YALE Cherry Hill during the on-site visit regarding frequency of fire drills.

Area of Need:

Frequency of Fire Drills - During the on-site visit, through staff interviews and a review of fire drill logs it was determined that YALE Cherry Hill does not conduct at least two fire drills per month.

• The school will revise its improvement plan to include procedures to ensure that fire drills are conducted at least twice a month. The plan must include an administrative oversight component to ensure consistent implementation of the procedures.

YALE East- Northfield

Summary of Findings:

During self-assessment, YALE East- Northfield accurately identified itself compliant in the areas of certificates of occupancy and inspections.

An area of need was identified for YALE East- Northfield during the on-site visit regarding programs provided in approved facilities relating to dual use and frequency of fire drills.

Areas of Need:

Dual Use- During the on-site visit, through staff interviews and a tour of the YALE East- Northfield school building, it was determined that one classroom serves dual instructional purposes, as a computer lab and an art class/reading instruction room. The school has not filed an application for dual use of this classroom space, as required.

 The school will immediately file the Dual Use Form with the county office of education. The school will revise its improvement plan to

include procedures to ensure that the school submits the appropriate applications and receives approval from the county office prior to modifying the use of approved classroom space.

Frequency of Fire Drills - During the on-site visit, through staff interviews and a review of fire drill logs, it was determined that YALE East- Northfield does not conduct at least two fire drills per month.

• The school will revise its improvement plan to include procedures to ensure that fire drills are conducted at least twice a month. The plan must include an administrative oversight component to ensure consistent implementation of the procedures.

YALE Southeast-Voorhees

Summary of Findings:

During self-assessment, YALE Southeast - Voorhees accurately identified itself compliant in the areas of programs provided in approved facilities and certificates of occupancy and inspections.

An area of need was identified for YALE Southeast - Voorhees during the onsite visit regarding frequency of fire drills.

Area of Need:

Frequency of Fire Drills - During the on-site visit, through staff interviews and a review of fire drill logs, it was determined that YALE Southeast- Voorhees does not conduct at least two fire drills per month.

 The school will revise its improvement plan to include procedures to ensure that fire drills are conducted at least twice a month. The plan must include an administrative oversight component to ensure consistent implementation of the procedures.

YALE Williamstown

Summary of Findings:

During self-assessment, YALE Williamstown accurately identified itself compliant in the areas of programs provided in approved facilities and certificates of occupancy and inspections.

Areas of need were identified for YALE Williamstown during the on-site visit regarding frequency of fire drills and nurses' station.

Areas of Need:

Frequency of Fire Drills - During the on-site visit, through staff interviews and a review of fire drill logs, it was determined that YALE Williamstown does not conduct at least two fire drills per month.

The school will revise its improvement plan to include procedures to ensure that fire drills are conducted at least twice a month. The plan must include an administrative oversight component to ensure consistent implementation of the procedures.

Nurses' Station- During the on-site visit, through staff interviews and a tour of the YALE Williamstown school building, it was confirmed that this area does not have sufficient square footage to allow for a private rest area, as required.

• The school will revise its improvement plan to include activities to identify an appropriate space for the provision of nursing services. Prior written approval for use of the new space must be obtained from the county office.

Section V: Individualized Education Plan (IEP)/Annual Review

Summary of Findings:

YALE Schools

During self-assessment, the YALE Schools accurately identified themselves compliant in the areas of IEP meetings conducted at least annually, IEP accessibility, inform teachers/providers of IEP responsibilities, no delay in IEP implementation, observation of proposed placement, statewide testing and progress reports.

Areas of need were identified for YALE Schools during the on-site visit regarding procedural safeguards, current IEPs, communication with sending districts regarding missing IEP components and IEP meetings conducted with appropriate participants.

Areas of Need:

Procedural Safeguards- During the on-site visit, through record reviews and interviews, it was determined that YALE Schools initiate scheduling of all IEP meetings, including issuing notifications to all participants. This practice is not consistent with administrative code guidelines which delegate responsibility to the district board of education for administering this process and for ensuring that procedural safeguards are provided in accordance with N.J.A.C. 6A:14-2.

 The school will revise its improvement plan to ensure that the school follows the appropriate procedures in accordance with N.J.A.C. 6A:14-7.5. The plan must include staff training and an administrative

oversight component to ensure consistent implementation of the procedures.

Current IEPs- During the on-site visit, through record reviews and interviews, it was determined that although a current district IEP is in effect at the time the student is enrolled. YALE Schools subsequently develops and implements its own IEP for each newly enrolled student during a routine 30-day IEP review meeting. Review of a vast sample of IEPs in each of the YALE programs indicates that the YALE-produced IEP does not contain all of the required IEP components and often does not reflect all of the programs and services that the district originally planned for the student.

 The school will revise its improvement plan to include procedures to ensure that the school implements district IEPs, as written. Recommendations for modification of the IEP may only be addressed through a written request to the sending school district, to convene an IEP review meeting. The revised improvement plan must also include staff training and administrative oversight component to ensure consistent, compliant implementation of the procedures.

Communication with Sending **Districts Regarding** Missing **Components-** During the on-site visit, through record reviews and interviews, it was determined that the YALE Schools do not communicate with sending districts when IEP components are missing, including but not limited to: behavioral intervention plans; least restrictive environment statements; extended school year consideration; related service delivery; including frequency, duration, location and designated provider; transition planning, where appropriate; transfer of rights at age of majority, where appropriate; graduation requirements and assistive technology.

• The school will revise its improvement plan to include procedures to ensure that the school communicates with sending districts when IEP components are missing. The plan must include staff training and an administrative oversight component to ensure consistent implementation of the procedures.

IEP Meetings Held with Appropriate Participants- During the on-site visit. through staff interviews it was determined that students are not encouraged to attend IEP meetings. The YALE Schools typically holds IEP meetings during the afternoon hours of scheduled shortened days. Students are transported to their homes upon early dismissal, and are not invited to the meetings.

 The school will revise its improvement plan to include procedures to ensure that students have the opportunity and are encouraged to attend IEP meetings. The plan must include staff training and an administrative oversight component to ensure that students attend IEP meetings, when appropriate.

Summary of Findings:

YALE- Cherry Hill

An area of need was identified for YALE Cherry Hill during the on-site visit regarding signatures on IEPs.

Areas of Need:

Signatures Present on IEPs- During the on-site visit, through record reviews and interviews it was determined that some students are asked to sign the IEP as a participant, although they did not attend the IEP meeting.

 The school will revise its improvement plan to include procedures to ensure that students are not asked to sign verification of attendance at IEP meetings that they do not attend. The plan must include staff training and an administrative oversight component to ensure consistent implementation of the procedures.

YALE East- Northfield YALE Medford YALE Voorhees YALE-Williamstown

Summary of Findings:

During self-assessment, the above sites accurately identified themselves compliant in the area of signatures present on IEPs.

No additional areas of need were identified for the above sites beyond those already identified under all YALE Schools' findings.

Section VII: Programs and Services

YALE Schools

Summary of Findings:

During self-assessment, the YALE Schools accurately identified themselves compliant in the areas of operating special class programs implementing IEPs and home instruction.

During the self-assessment process, the YALE Schools identified concerns in the area of nursing service logs. The school has developed an improvement plan that is sufficient to meet this area of need. Documentation of improvement was verified during the on-site visit.

Additional areas of need were identified during the on-site visit in the area of description of special class programs, core curriculum content standards and evaluation without referral.

Areas of Need

Description of Special Class Programs- During the on-site visit, through documentation review it was determined that the school has not submitted revised descriptions of special class programs to the county office of education for approval prior to implementation, as required.

 The school will revise its improvement plan to include procedures to ensure that the school submits a revised description of special class programs to the county office of education for approval, prior to implementing program changes. The plan must include an administrative oversight component to ensure consistent implementation of the procedures.

Core Curriculum Content Standards- During the on-site visit through staff interviews and classroom observations it was determined that staff did not consistently have knowledge of core curriculum content standards.

 The school will revise its improvement plan to ensure that teachers receive comprehensive and on-going in-service training on New Jersey Core Curriculum Content Standards. The plan must include an administrative oversight component to ensure consistent implementation of the procedures.

Evaluation without referral- During the on-site visit, it was determined that related services staff conduct evaluations on enrolled students, without the sending school districts' knowledge. The school then proceeds to initiate service or modify the frequency and/or duration of the service, without regard for the IEP meeting process.

• The school will revise its improvement plan to ensure that when the school believes that a student requires an evaluation to initiate, terminate or modify related services, a referral must be made to the child study team of the sending district. The improvement plan must include an administrative oversight component to ensure consistent implementation of the procedures.

YALE North- Medford

Summary of Findings:

During self-assessment, YALE North-Medford accurately identified itself compliant in the areas of class size/age range and exceptions.

Additional areas of need were identified during the on-site visit for YALE North-**Medford** in the area of dispensing of medication and nursing services.

Areas of Need

Dispensing Medication- During the on-site visit, through staff interviews and observations it was determined that medication is administered to students without appropriate physicians' orders.

• The school will revise its improvement plan to include procedures to ensure that medication is dispensed only when appropriate physicians' orders are received by the school nurse. The plan must include an administrative oversight component to ensure consistent implementation of the procedures.

Nursing Services- During the on-site visit, through record reviews and interviews it was determined that YALE North-Medford employs a part time nurse, whose assigned duties are limited to dispensing of medications. The school does not provide the required range of nursing services.

 The school will revise their improvement plan to include procedures to ensure that the school administration provides the required full range of nursing services, by employing a full time certified school nurse or by submitting a nursing services plan, to the county superintendent, for review and approval. The improvement plan must include staff training and an administrative oversight component to ensure consistent implementation of the procedures.

YALE East- Northfield

Summary of Findings:

During self-assessment, YALE East-Northfield accurately identified itself compliant in the areas of class size/age range and exceptions.

Areas of need were identified during the on-site visit for YALE East- Northfield in the area of nursing services.

Areas of Need:

Nursing Services- During the on-site visit, through staff interviews, it was determined that YALE East-Northfield does not have procedures for ensuring that medication is administered by appropriately licensed staff when the school nurse is absent. During the on-site visit, staff members were initiating correction in this area prior to the completion of the on-site monitoring.

• The school will revise its improvement plan to include the development of a nursing services plan, to be submitted to the

county superintendent for review and approval. The improvement plan must include an administrative oversight component to ensure consistent implementation of the procedures.

YALE Southeast- Voorhees

Summary of Findings:

During self-assessment, YALE-Voorhees accurately identified itself compliant in the area of provision of preschool programs.

Areas of need were identified during the on-site visit regarding class size/age range exceptions and nursing services.

Areas of Need

Class Size/Age Range- During the on-site visit, through documentation review, it was determined that two classes exceeded allowable class sizes.

• The school will revise its improvement plan to include procedures to ensure that the school requests a class size exception through the sending school districts. Written approval by the county office is required prior to increasing the class size. The plan must include an administrative oversight component to ensure implementation of the procedures.

Nursing Services- During the on-site visit, through staff interviews, it was determined that the nurse does not possess Department of Education certification as a school nurse.

 The school will revise its improvement plan to include procedures to employ a certified school nurse, or to develop a nursing services plan for review and approval by the county superintendent. The plan must include an administrative oversight component to ensure consistent implementation of the procedures.

YALE Williamstown

Summary of Findings:

During self-assessment, YALE Williamstown accurately identified itself compliant in the areas of class size/age range exceptions.

An additional area of need was identified during the on-site visit for YALE Williamstown in the area of nursing services

Area of Need-

Nursing Services- During the on-site visit, through staff interviews, it was determined that the nurse does not posses the Department of Education certification as a school nurse.

The school will revise its improvement plan to include procedures to employ a certified school nurse, or to develop a nursing services plan for review and approval by the county superintendent. The plan must include an administrative oversight component to ensure consistent implementation of the procedures.

Section VIII: Student Records

YALE Cherry Hill

Summary of Findings:

During self-assessment, YALE Cherry Hill accurately identified itself compliant in daily attendance and student health records.

Areas of need were identified during the on-site visit for YALE Cherry Hill regarding conformance to pupil record code, including return of records, confidentially, access to records, security of records, access sheets, location of records, notice of excessive tardiness/absences and written notification of attendance.

Areas of Need:

Return of Records- During the on-site visit, through record reviews, it was determined that YALE Cherry Hill does not consistently return records to the sending district when the student is no longer enrolled in the school.

• The school will revise its improvement plan to include procedures to ensure that student records are returned to sending districts when placement is terminated. The plan must include administrative oversight component to ensure consistent implementation of the procedures.

Identifying Student Information- During the on-visit, through record reviews, it was determined that the confidentially of students was compromised by the inclusion of students' names in reports disseminated to persons who do not have assigned educational responsibility for those students.

• The school will revise its improvement plan to include procedures to ensure that the school maintains confidentiality of pupil record information by appropriately limiting reference to the identity of students in all correspondence and record keeping. The plan must

include staff training and an administrative oversight component to ensure consistent implementation of the procedures.

Access to Records- During the on-site visit, through record reviews, staff interviews and classroom observations, it was determined that non certified staff members have access to student records.

• The school will revise its improvement plan to include procedures to ensure that access to pupil records is limited to appropriately certified staff members who have educational responsibility for the individual student. The plan must include staff training and an administrative oversight component to ensure consistent implementation of the procedures.

Security of Records- During the on-site visit, it was determined that YALE Cherry Hill utilizes a computer program to develop and maintain pupil record The program lacks required security blocks to protect against security violations. It was further determined that teachers maintain copies of student IEPs in non-secure locations.

 The school will revise its improvement plan to include procedures to ensure that all student records are maintained in a secure fashion, including installation of computer blocks and provision of record maintenance locations with locks. The plan must include staff training and an administrative oversight component to ensure consistent implementation of the procedures.

Access Sheets- During the on-site visit, through record reviews, it was determined that many student records did not contain required access sheets to be used by persons for whom prior written authorization by the superintendent of the sending school district is required.

• The school will revise its improvement plan to include procedures to ensure that all student records contain access sheets with the required components, including: name of the person granted access; the reason access was granted; the time and circumstances of inspection; the records studied and the purposes for which the data will be used. The plan must include an administrative oversight component to ensure consistent implementation of the procedures.

Location of Records- During the on-site visit, through record reviews, it was determined that student records did not consistently contain notations in the central file as to where other records are maintained.

• The school will revise its improvement plan to include procedures to ensure that student records contain notations in the central file indicating where other records are maintained. The plan must

include an administrative oversight component to ensure consistent implementation of the procedures.

Habitual Tardiness/Absences- During the on-site visit, through staff interviews and record reviews, it was determined that YALE Cherry Hill does not notify the sending district in writing when students are habitually tardy or absent for more than five days.

 The school will revise its improvement plan to include procedures to ensure that sending districts are notified in writing when students are habitually tardy or absent for more than five days. The plan must include staff training and an administrative oversight component to ensure consistent implementation of the procedures.

Written Notice of Attendance- During the on-site, visit through record reviews, it was determined that YALE Cherry Hill does not consistently provide required written notification to the Department of Education, through the county office of education, within ten calendar days of the student's first day of attendance.

• The school will revise its improvement plan to include procedures to ensure that the school provides written notification to the Department of Education, through the county office of education, within ten calendar days of the student's first day of attendance. The plan must include an administrative oversight component to ensure consistent implementation of the procedures.

YALE North- Medford

Summary of Findings:

During self-assessment, YALE North-Medford accurately identified itself compliant in return of records, daily attendance, tardiness/absences, written notice of attendance, and student health records.

Areas of need were identified during the on-site visit for YALE North-Medford regarding location of records.

Areas of Need:

Location of Records- During the on-site visit, through record reviews, it was determined that student records did not consistently contain notations in the central file as to where other records are maintained.

 The school will revise its improvement plan to include procedures to ensure that student records contain notations in the central file indicating where other records are maintained. The plan must include an administrative oversight component to ensure consistent implementation of the procedures.

YALE East- Northfield

Summary of Findings:

During self-assessment, YALE East-Northfield accurately identified itself compliant in conformance to pupil record code, return of records, access sheets, daily attendance, and written notice of attendance and student health records.

Areas of need were identified during the on-site visit for YALE East-Northfield regarding access to records, security of computerized records, location of records and tardiness/absences.

Access to Records- During the on-site visit, through record reviews, staff interviews and classroom observations, it was determined that access to records is not limited to those certified staff members who have assigned educational responsibility for pupils.

 The school will revise its improvement plan to include procedures to ensure that access to pupil records is limited to those appropriately certified staff members who have educational responsibility for the individual student. The plan must include staff training and an oversight component to consistent administrative ensure implementation of the procedures.

Security of Records- During the on-site visit, it was determined that the school utilizes a computer program to develop and maintain pupil record information. The program lacks required security blocks to protect against security violations. It was further determined that teachers maintain copies of student IEPs in nonsecure locations.

• The school will revise its improvement plan to include procedures to ensure that all student records are maintained in a secure fashion. including installation of computer blocks and provision of record maintenance locations with locks. The plan must include staff training and an administrative oversight component to ensure consistent implementation of the procedures.

Location of Records- During the on-site visit, through record reviews, it was determined that student records did not consistently contain notations in the central file as to where other records are maintained.

• The school will revise its improvement plan to include procedures to ensure that student records contain notations in the central file indicating where other records are maintained. The plan must include an administrative oversight component to ensure consistent implementation of the procedures.

Habitual Tardiness/Absences- During the on-site visit, through staff interviews and record reviews, it was determined that YALE East-Northfield does not notify the sending district in writing when students are habitually tardy or absent for more than five days.

 The school will revise its improvement plan to include procedures to ensure that sending districts are notified in writing when students are habitually tardy or absent for more than five days. The plan must include staff training and an administrative oversight component to ensure consistent implementation of the procedures.

YALE Williamstown

Summary of Findings:

During self-assessment, YALE Williamstown accurately identified itself compliant in daily attendance and student health records.

Areas of Need:

Areas of need were identified during the on-site visit for YALE Williamstown regarding access to records, security of records, reporting of excessive tardiness/absences, and written notice of attendance.

Access to Records- During the on-site visit, through record reviews, staff interviews and classroom observations, it was determined that access to records is not limited to those certified staff members who have assigned educational responsibility for pupils.

 The school will revise its improvement plan to include procedures to ensure that access to pupil records is limited to those appropriately certified staff members who have educational responsibility for the individual student. The plan must include staff training and an administrative oversight component to ensure consistent implementation of the procedures.

Security of Records- During the on-site visit, it was determined that teachers are not maintaining student records in secure locations.

• The school will revise its improvement plan to include procedures to endure that student records are secure. The plan must include staff training and an administrative oversight component to ensure consistent implementation of the procedures.

Habitual Tardiness/Absences- During the on-site visit, through staff interviews and record reviews, it was determined that YALE Williamstown does not notify the sending district in writing when students are habitually tardy or absent for more than five days.

 The school will revise its improvement plan to include procedures to ensure that sending districts are notified in writing when students are habitually tardy or absent for more than five days. The plan must include staff training and an administrative oversight component to ensure consistent implementation of the procedures.

Written Notice of Attendance- During the on-site visit, through record reviews, it was determined that YALE Williamstown does not consistently provide written notification to the Department of Education through the county office of education within ten calendar days of the student's first day of attendance.

• The school will revise its improvement plan to include procedures to ensure that the school provides written notification to the Department of Education, through the county office of education, within ten calendar days of the students' first day of attendance. The plan must include an administrative oversight component to ensure consistent implementation of the procedures.

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 YALE Schools on March 25-April 10, 2003. The purpose of the monitoring visit was to verify the YALE School's report of findings resulting from their self-assessment and to review the receiving school's improvement plan.

YALE Schools

Areas identified as consistently compliant by all YALE Schools during selfassessment and verified during the on-site monitoring visit included annual reports, amendments, provision of programs in nonsectarian settings, discipline, physical education, hearing aids, services provided to children at no cost to parents, observation of programs, use of physical therapy assistants and certified occupational therapy assistants, private school dual employment, having an approved professional development plan, IEP meetings conducted at least annually, IEP accessibility, teachers/providers informed of IEP responsibilities, observation of proposed placement, statewide testing, progress reports, special class programs, implementing IEPs, home instruction. .

During the self-assessment process, the YALE Schools, with the exception of YALE Voorhees, identified concerns in the areas of policies and procedures relating to joint training of staff and parents, job descriptions of paraprofessionals, nursing services relating to nursing logs.

Areas of need identified during the onsite visit for the YALE Schools include: procedural safeguards, current IEPs and communication with districts regarding IEP components, IEP conducted with appropriate participants, description of special class programs, core curriculum content standards, and evaluation without referral.

An area of concern, regarding a significant number of the teaching staff who hold only emergency certification, was also identified.

YALE Cherry Hill

Areas identified as consistently compliant by YALE-Cherry Hill during selfassessment and verified during the on-site monitoring visit included programs provided in approved facilities and certificate of occupancy and inspections, daily attendance, and health records.

The on-site visit identified additional areas of need within the various standards length of school day/year, provision of related regarding certified/licensed staff, criminal history verification, frequency of fire drills, IEPs held with appropriate participants, signatures on IEPs, conformance to pupil records code including: return of records, confidentiality, access to records, security of records, access sheets, location of records, notice of excessive absence/tardiness, notification of attendance.

YALE North- Medford

Areas identified as consistently compliant by YALE North- Medford during selfassessment and verified during the on-site monitoring visit included length of school day/year, provision of programs and services in accordance with IEPs, certified/licensed staff, class size/age range waivers, return of records, daily attendance, tardiness/absences, and written notice of attendance.

During the self-assessment process, YALE North- Medford 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, updated fire certificates, criminal history verification, dispensing of medication, nursing services and location of records.

YALE East- Northfield

Areas identified as consistently compliant by the YALE East- Northfield during self-assessment and verified during the on-site monitoring visit included: extended school year, criminal history, professional development, certificates of occupancy and inspections, signatures present on IEPS, no delay in implementation, procedures for time out rooms, restraints and aversives, removal of student, changes to program/placement, suspensions, interim alternative educational setting, termination of student, class size/age range, exceptions, home instruction, conformance to pupil record code, access sheets, daily attendance, written notice of attendance, and student health records.

During the self-assessment process, the YALE East- Northfield identified areas of need regarding staff development, job descriptions of paraprofessionals, and nursing services.

The on-site visit identified additional areas of need within the various standards regarding length of day/year, provision of services as per IEP, related services, certified/licensed staff, programs provided in approved facilities regarding dual use, fire drills, current IEP, communication to sending district regarding missing

components, implementation of IEP components, description of special class programs, certifications, Core Curriculum Content Standards (CCCS), dispensing medication, access to records, location of records, and tardiness/absences.

YALE Southeast- Voorhees

Areas identified as consistently compliant by the YALE Southeast - Voorhees during self-assessment and verified during the on-site monitoring visit included criminal history verification, programs provided in approved facilities, certificates of occupancy and inspections and provision of preschool programs.

The on-site visit identified additional areas of need within the various standards regarding extended school year program, certified/licensed staff, frequency of fire drills, class size/age range exceptions, and nursing services.

YALE Williamstown

Areas identified as consistently compliant by the YALE Williamstown during self-assessment and verified during the on-site monitoring visit included: extended school year, certified/licensed staff, programs provided in approved facilities and certificates of occupancy and inspection, signatures present on IEPs, class size/age range exceptions, daily attendance and student health records.

The on-site visit identified additional areas of need within the various standards regarding length of school day/year, provision of related services, as per IEP, criminal history verification, frequency of fire drills, nurses' station, nursing services, access to records, security of records, reporting of excessive tardiness/absences, and written notice of attendance.