

New Jersey Department of Education Special Education Monitoring

District: Egg Harbor City School District

County: Atlantic

Monitoring Dates: September 17, 18, 19, 2002

Monitoring Team: Patricia Fair, Ken Richards

Background Information:

During the 2001–2002 school year, the Egg Harbor City School District conducted a self-assessment of policies, procedures, programs, services, and student outcomes. This self-assessment component of the monitoring process provided the Egg Harbor City School District 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 protection of procedural safeguards for students and their families;
- The development and implementation of policies and procedures resulting in procedural compliance; and,
- The organization and delivery of programs and services resulting in positive student outcomes.

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 Egg Harbor City School District developed an improvement plan to address identified areas of need.

The Office of Special Education Programs (OSEP) 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.

As the first step in the on-site monitoring process, the New Jersey Department of Education (NJDOE) held a focus group meeting for parents and community members at the C. L. Spragg Elementary School on September 11, 2002. Information obtained from that meeting was used to direct the focus of the monitoring visit.

During the on-site visit, the NJDOE team reviewed district documents, including district policies and procedures, student count information, master student lists, class lists, schedules of students, teachers, related service personnel, and other relevant information, including a representative sample of student records. Interviews were conducted with the district's special education administrators, building principals, general education and special education teachers, speech therapists and child study team members.

District Strengths:

The district provides Edutest, a criterion-referenced assessment that is used by teachers and administrators to monitor the effectiveness of instruction and to plan accordingly. Each of Edutest's assessments is directly related to New Jersey's Core Curriculum Content Standards.

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The district also has a computer-based diagnostic prescriptive program, the Compass program, which is being used to identify individual student strengths and weaknesses.

The Skill Streaming Program promotes character education and addresses behavioral concerns.

The district makes excellent use of computer technology by linking staff through an e-mail system. This system allows staff to communicate with each other immediately about student progress, student concerns, and program needs.

Areas Demonstrating Compliance With All Standards:

Statewide Assessment and **Student Records** were determined to be areas of compliance by the district during self-assessment and by the Office of Special Education Programs during the on-site visit.

Section I: General Provisions

Summary of Findings:

During self-assessment the district accurately identified themselves compliant in the areas of policies and procedures and dissemination of IDEA information.

During the self-assessment process, the district identified concerns in the area of staff/parent training. The district's improvement plan is insufficient to address this area because it lacks a mechanism to determine the effectiveness of the in-service and an administrative oversight component to ensure the consistent, compliant implementation of the procedures. The plan needs to be revised to include these elements.

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

Section II: Free, Appropriate Public Education (FAPE)

Summary of Findings:

During self-assessment the district accurately identified themselves compliant in the areas of length of school day/year and certification.

During the self-assessment process, the district identified concerns in the areas of provision of speech and language services, goals and objectives for related services and IEP implementation. The district's improvement plan is insufficient because the timelines it has identified for completion of activities have not been met. The district needs to identify new timelines and then implement the identified activities by those newly identified dates.

Additional areas of need were identified during the on-site visit regarding extended school year, related services, transfer students, provision of special education services and facilities. The county office has been notified of the facilities issues.

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Area(s) of Need:

Extended School Year – During the on-site visit, a review of records and interviews with staff indicated that extended school year is not consistently considered for all students and provided when appropriate.

- **The district will revise its improvement plan to include procedures to ensure the district considers extended school year for all students and provides it when appropriate. The plan must include in-service, a mechanism to determine the effectiveness of the training and an administrative oversight component to ensure the consistent, compliant implementation of the procedures.**

Related Services - During the on-site visit, a review of records and interviews with staff indicated that the need for counseling is determined based on student, parent, and or teacher request and not on a review of evaluations, assessment data and/or input from the IEP team members.

- **The district will revise its improvement plan to include procedures to ensure the district determines the need for related services on an individual basis and provides those services when appropriate. The plan must include in-service, a mechanism to determine the effectiveness of the training and an administrative oversight component to ensure the consistent, compliant implementation of the procedures.**

Provision of Special Education Services - During the on-site visit, interviews with staff indicated that special education teachers are often pulled from their classroom assignments to provide coverage for absent staff members.

- **The district will revise its improvement plan to include procedures to ensure classes are covered through the use of substitute teachers and not through the reassignment of special education teachers. The plan must include an administrative oversight component to ensure the consistent, compliant implementation of the procedures.**

Section III: Procedural Safeguards

Summary of Findings:

During self-assessment the district accurately identified themselves compliant in the areas of surrogate parents, consent for initial evaluations and independent evaluations.

During the self-assessment process, the district identified concerns in the areas of provision of written notice and attempts to secure parent participation. The district's improvement plan is sufficient to address these areas. The district further identified content of notice of meeting and native language. The district's improvement plan is insufficient to address these areas because it lacks an administrative oversight component to ensure the consistent implementation of the procedure. The plan needs to be revised to include this component.

Additional areas of need were identified during the on-site visit, regarding consent, written notice, and written notice of eighth grade transition IEPs.

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Area(s) of Need:

Consent - During the on-site visit, a review of records and interviews with staff indicated that when the district proposes to implement the IEP sooner than 15 days they do not consistently obtain parental consent.

- **The district will revise its improvement plan to include procedures to ensure that the district obtains consent to implement IEPs prior to the 15-day review period. The plan must include an administrative oversight component to ensure the consistent, compliant implementation of the procedures.**

Written Notice - During the on-site visit, a review of records and interviews with staff indicated that the district does not consistently provide written notice within 15 days of a meeting.

- **The district will revise its improvement plan to include procedures to ensure the district provides written notice within 15 days of a meeting. The plan must include an administrative oversight component to ensure the consistent, compliant implementation of the procedures.**

Written Notice of Eighth Grade Transition IEPs- During the on-site visit, a review of student records and interviews with district personnel indicated that two IEPs are developed for eighth grade students. One IEP is considered the annual review IEP and utilizes Egg Harbor City's IEP format. The other IEP is an IEP for services that will be provided by the receiving school district as of July 1st. This IEP is developed with a representative from the receiving district and utilizes the receiving school district's IEP format. Egg Harbor City provides written notice of both IEPs. Instead, the district should be developing one IEP, with input from the receiving school district, that includes the program and services that will be provided in the coming school year. Once developed, the district will then provide notice of that IEP. In the event the receiving school district disagrees with the IEP, that district may convene its own team after July 1st, develop a new IEP and provide notice

- **The district will revise its improvement plan to include procedures to ensure the district develops an IEP that includes the program and services the student will receive in the coming school year. Once developed the district may provide the parent with written notice. The plan must include in-service training, a mechanism to determine the effectiveness of the training and an administrative oversight component to ensure the consistent, compliant implementation of the procedures.**

Section IV: Location, Referral and Identification

Summary of Findings:

During self-assessment the district accurately identified themselves compliant in the areas of child find, summer referrals, identification meetings, and participants.

During the self-assessment process, the district identified concerns in the areas of health summary, vision and hearing screenings and summer referrals. The district's improvement plan is insufficient to address these areas because it lacks an

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administrative oversight component to ensure the consistent implementation of the procedures. The plan needs to be revised to include this component.

Additional areas of need were identified during the on-site visit regarding direct referrals and identification timelines.

Area(s) of Need:

Direct Referrals - During the on-site visit, review of records and interviews with staff indicated that teachers were not permitted to make a direct referral to the child study team. All referrals must go through the prereferral intervention process first.

- **The district will revise its improvement plan to include procedures to ensure teachers have the opportunity to make direct referrals to the child study team and to participate in a meeting when they believe the nature of the student's problem is such that an evaluation is warranted. The school personnel and the parent will then make a determination as to whether an evaluation is needed. The improvement plan must include a mechanism to establish criteria that identifies the type of documentation that would support a staff request for a direct referral. The improvement plan must also include staff training and an administrative oversight component to ensure the consistent, compliant implementation of the procedures.**

Identification timelines - During the on-site visit, a review of records determined that because referrals to child study team members are not dated, compliance with 20-day timelines could not be verified.

- **The district will revise its improvement plan to include procedures to ensure that referrals to the child study team are dated. The plan must include an administrative oversight component to ensure the consistent, compliant implementation of the procedures.**

Section V: Protection in Evaluation and Evaluation Procedures

Summary of Findings:

During self-assessment the district accurately identified themselves compliant in the areas of bilingual evaluations, standardized assessments, multi-disciplinary evaluations, and independent evaluations.

During the self-assessment process, the district identified concerns in the areas of functional assessments, speech and language written reports and acceptance/rejection of reports. The district's improvement plan is sufficient to address these areas.

An additional area of need was identified during the on-site visit regarding written reports.

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Area(s) of Need:

Written Reports - During the on-site visit, review of records indicated that reports are not consistently signed or dated.

- **The district will revise its improvement plan to include procedures to ensure reports are signed and dated by the evaluator. The plan must include an administrative oversight component to ensure the consistent, compliant implementation of the procedures.**

Section VI: Reevaluation

Summary of Finding:

During self-assessment the district accurately identified themselves compliant in the areas of planning meetings, participants at planning meetings and turning age 5.

During the self-assessment process, the district identified concerns in the areas of timelines. The district's improvement plan is sufficient to address this area of need.

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

Section VII: Eligibility

Summary of Findings:

During self-assessment the district accurately identified themselves compliant in the area of meeting participants.

During the self-assessment process, the district identified concerns in the areas of criteria, documentation of eligibility and provision of evaluation reports to parents/adult students. The district's improvement plan is sufficient to address criteria and documentation of eligibility. The district did not submit an improvement plan for provision of a copy of evaluation reports to parents/adult students. The plan needs to be revised to include procedures and an administrative oversight component to ensure the consistent implementation of the procedures.

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

Section VIII: Individualized Education Program (IEP)

Summary of Findings:

During self-assessment the district accurately identified themselves compliant in the area of age of majority.

During the self-assessment process, the district identified concerns in the areas of participants, considerations/required statements, goals and objectives, annual review timelines, 90-day timelines, provision of IEP to parents and teacher knowledge of IEP. The district's improvement plan is sufficient to address participants, considerations/required statements, goals and objectives and 90-day timelines. The district did not include an improvement plan to address the provision of IEPs to parents.

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The plan needs to be revised to include procedures and an administrative oversight component to bring about the required changes.

Additional areas of need were identified during the on-site visit regarding annual review timelines and frequency and duration of services.

Area(s) of Need:

Annual Review Timelines - During the on-site visit, a review of records indicated that annual reviews are not being completed within a twelve month period of time.

- **The district will revise its improvement plan to include procedures to ensure IEPs are reviewed annually. The plan must include an administrative oversight component to ensure the consistent, compliant implementation of the procedures.**

Frequency and Duration of Service - During the on-site visit, a review of IEPs indicated a 40-50 minute range of time for services in the in-class support resource program. Interviews with staff indicated that the amount of time the students received was determined by the teacher's schedule and how long it would take the teacher to get to the next class.

- **The district will revise its improvement plan to include procedures to ensure that duration of services is specifically documented in the IEP. The plan must include an administrative oversight component to ensure the consistent, compliant implementation of the procedures.**

Section IX: Least Restrictive Environment (LRE)

Summary of Findings:

During self-assessment the district accurately identified themselves compliant in the areas of individual decision-making, considerations and documentation, supplemental aides and services, regular education access and continuum

During the self-assessment process, the district identified concerns in the areas of Oberti and non-academic and extracurricular participation. The district's improvement plan is sufficient to address Oberti. The district further identified issues regarding the lack of participation in extracurricular activities. The improvement plan is insufficient to address non-academic and extracurricular participation because it lacks an administrative oversight component to ensure the consistent implementation of the procedures. The plan needs to be revised to include this component.

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

Section X: Transition to Post-School

Summary of Findings:

During self-assessment the district accurately identified themselves compliant in the area of student/agency invitation and agency involvement,

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An area of need was identified during the on-site visit regarding transition service needs.

Area(s) of Need:

Transition Service Needs - During the on-site visit, record review and interviews with staff indicated that interests and preferences are not consistently assessed. When they are assessed, the method used to obtain this information was not included in the student's file.

- **The district will revise its improvement plan to include procedures to ensure student interests and preferences are obtained and that the method used to obtain this information is documented in the student file. The plan must include an administrative oversight component to ensure the consistent, compliant implementation of the procedures.**

Section X: Transition to Preschool

Summary of Findings:

During self-assessment the district accurately identified themselves compliant in the areas of preschool transition plan conference.

During the self-assessment process, the district identified concerns in the areas of early intervention programs to preschool disabled by age 3. The district's improvement plan is insufficient to address this area of need because it lacks an administrative oversight component to ensure the consistent implementation of the procedures. The plan needs to be revised to include this component.

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

Section XI: Discipline

Summary of Findings:

During self-assessment the district accurately identified themselves compliant in the areas of procedures and interim alternative educational setting.

Areas of need were identified during the on-site visit regarding notification to case manager, suspension tracking and manifestation determinations.

Area(s) of Need:

Notification to Case Manager - During the on-site visit, record review and interviews with staff indicated that case managers do not consistently receive notification when classified students are removed for disciplinary reasons.

- **The district will revise its improvement plan to include procedures to ensure case managers are consistently notified of disciplinary actions against classified students. The plan must include a mechanism to track these removals as well as an administrative oversight component to ensure the consistent implementation of the procedures.**

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Manifestation Determination- During the on-site visit, interviews with staff indicated that manifestation determination meetings are conducted when required. However, this information could not be verified through parent interviews or a review of student files.

- **The district will revise its improvement plan to include procedures to ensure that manifestation determination meetings are conducted when required and that the results of those meetings are documented in the student file. The plan must include an administrative oversight component to ensure the consistent, compliant implementation of the procedures.**

Section XIII: Graduation

Summary of Findings:

During self-assessment the district accurately identified themselves compliant in the areas of out-of-district participation and eighth grade diploma.

An area of need was identified during the on-site visit regarding IEP documentation.

Area(s) of Need:

IEP Documentation- During the on-site visit, record review and interviews with staff indicated that high school graduation requirements are not consistently documented for students beginning at age 14.

- **The district will revise its improvement plan to include procedures to ensure that high school graduation requirements are consistently documented in IEPs for students who are 14 years of age and older. The plan must include an administrative oversight component to ensure the consistent, compliant implementation of the procedures.**

Section XIV: Programs and Services

Summary of Findings:

During self-assessment the district accurately identified themselves compliant in the areas of class size waivers, age range waivers, home instruction and programs.

During the self-assessment process, the district identified concerns in the areas of personnel. The district's improvement plan is sufficient to address this area.

Additional areas of need were identified during the on-site visit regarding group size for speech and common planning time.

Area(s) of Need:

Group Size for Speech - During the on-site visit, a review of the schedules indicated that speech group sizes exceeded 5 students.

- **The district will revise its improvement plan to include procedures to ensure that speech group sizes do not exceed 5 students. The plan must include an**

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

Common Planning Time - During the on-site visit a review of schedules and interviews with staff determined that resource program teachers and general education teaching staff are not afforded consultation time.

- **The district will revise its improvement plan to include procedures to ensure that resource program teachers and general education teachers are afforded consultation time. The plan must include an administrative oversight component to ensure the consistent implementation of the procedures.**

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Summary

On-site special education monitoring was conducted in the Egg Harbor School District on September 17, 18, 19, 2002. The purpose of the monitoring visit was to verify the district's report of findings resulting from their self-assessment and to review the district's improvement plan. The district is commended for the comprehensive review conducted during the self-assessment process. As a result of that review the district was able to identify areas of need and develop an improvement plan that with some revision will bring about systemic change. The district is further commended for the many areas determined by the district and verified by the Office of Special Education Programs as compliant with federal and state statutes and regulations.

At a focus group meeting held prior to the monitoring visit, parents expressed their satisfaction with teaching staff. Many of the concerns raised by parents during the focus group meeting had already been identified by the district during the self-assessment process. Among those concerns raised by the parents were the provision of related services and teacher knowledge of IEPs.

Areas identified as consistently compliant by the district during self-assessment and verified during the on-site monitoring visit included policies and procedures, dissemination of IDEA information, length of school day/year, certification, surrogate parents, consent for initial evaluations, independent evaluations, child find, bilingual evaluations, standardized assessments, multi-disciplinary evaluations, planning meetings, meeting participants, age of majority, individual decision-making, considerations and documentation, supplemental aides and services, regular education access, continuum, preschool transition planning conference, class-size, age-range, home instruction and programs.

During the self-assessment process, the district identified areas of need regarding provision of speech and language services, goals and objectives for related services, IEP implementation, notice of meetings, written notice in native language, health summary, vision and hearing screenings, functional assessments, speech and language written reports, accept/rejection of reports, timelines, documentation of eligibility, copy of evaluation report to parents, participants, consideration/required statements, goals and objectives, annual review timelines, 90-day timelines, copy of IEP to parents, teacher knowledge of IEP, Oberti, non-academic and extracurricular participation and sufficient personnel.

The on-site visit identified additional areas of need within the various standards regarding extended school year, related services, transfer students provision of special education services, facilities, consent, written notice, notice of meeting, written notice of eighth grade transition IEPs, direct referrals, identification meeting timelines, written reports, meetings, implementation dates IEP, transition service needs discipline,

Within forty-five days of receipt of the monitoring report, the Egg Harbor School District will revise and resubmit the improvement plan to the Office of Special Education Programs to address those areas that require revisions.