

## **New Jersey Department of Education Special Education Monitoring**

**District:** Black Horse Pike Regional School District

**County:** Camden

**Monitoring Dates:** October 12, 13, 14, 2004

**Monitoring Team:** Julia Harmelin, Patricia Fair, and Ken Richards

### ***Background Information:***

During the 2003-2004 school year, the Black Horse Pike Regional School District conducted a self-assessment of policies, procedures, programs, services, and student outcomes. This self-assessment component of the monitoring process provided the Black Horse Pike Regional School District 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 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 Black Horse Pike Regional 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 Highland Regional High School on October 6, 2004. Information obtained from that meeting was used to assist in 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 sponsors a transition project, which is run through Princeton Center for Leadership Training. The program is designed to ease the transition into high school for all ninth grade students. There are 85 volunteer Peer Leader Navigators and 18 volunteer staff members, who work with the entire ninth grade at least one time per month.

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The district hosts a Renaissance Program, in which over 150 students and staff were trained in the principles of Renaissance at Highland High School. This is the 11<sup>th</sup> year of Renaissance in the district, which seeks to recognize, respect, reward, and reinforce strong academic performance, mature behavior, good attendance, and strong school/community service for large numbers of students at varying levels of ability.

### **Data Summary:**

The Black Horse Pike Regional School District reported a classification rate of 15.5% for the 2003-2004 school year, which is below the state average of 16.3%. The data submitted by the district indicated that the percentage of special education students placed in out-of-district settings has decreased due to the initiation of in-district behavior disabilities classes. During the 2003-2004 school year, 38.6% of the students eligible for special education and related services were placed in general education settings for more than 80% of the day; this falls below the state average of 41.6%; however, there has been an increase in this percentage over the past two years.

### ***Areas Demonstrating Compliance With All Standards:***

**Evaluation** was determined to be an area 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 compliance 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 professional and parent development. **The district's improvement plan is insufficient to address these issues because the plan lacks an administrative oversight component to ensure the consistent implementation of the procedures. The 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)***

#### **Summary of Findings:**

During self-assessment, the district accurately identified compliance in the areas of length of day and year, facilities, oversight of IEP implementation, and certifications.

During the self-assessment process, the district identified concerns in the areas of extended school year, provision of counseling services, and transfer students. The district's improvement plan is sufficient to address these areas. Although the district initially identified goals and objectives for related services and the provision of adaptive

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physical education as areas of need, the district was able to demonstrate that it has already brought about correction in this area.

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

### ***Section III: Procedural Safeguards***

#### **Summary of Findings:**

During self-assessment, the district accurately identified compliance in the areas of consent, meetings, and independent evaluations.

During the self-assessment process, the district identified concerns in the areas of written notice and native language. The district's improvement plan is sufficient to address these areas. Although the district initially identified surrogate parent policy and notices of meetings as areas of need, the district was able to demonstrate that it has already brought about correction in these areas.

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

### ***Section IV: Location, Referral and Identification***

#### **Summary of Findings:**

During self-assessment, the district accurately identified compliance in the areas of child find ages 3-21, direct referrals, and identification meeting participants and timelines.

During the self-assessment process, the district identified concerns in the areas of health summary, vision and hearing screenings, and pre-referral interventions. The district's improvement plan is sufficient to address these areas.

Additional areas of need were identified during the on-site visit regarding summer referrals and the referral process.

#### **Areas of Need:**

**Summer Referrals**—During the on-site monitoring visit, it was determined through record review and staff interviews that due to the lack of staff employed during the summer months, referrals, evaluations, and 90-day timelines are noncompliant.

- **The district will revise its improvement plan to include procedures to ensure that appropriate staff members are employed during the summer months in order to complete all referrals, evaluations, and 90-day timelines. Implementation of these activities will result in the compliant response to referrals and compliant timelines. The plan must include an administrative oversight component to ensure the consistent, compliant implementation of the procedures.**

**Date of Referral**—During the on-site monitoring process, it was determined through record review and staff interviews that the date of referral is not consistently documented

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in student files, therefore making it impossible to determine if 20-day timelines are compliant.

- **The district will revise its improvement plan to include procedures to ensure that the date of referral is clearly documented in student files. Implementation of these activities will result in identification meetings held within 20 days of receipt of referral to the child study team to determine whether evaluations are warranted. The plan must include an administrative oversight component to ensure the consistent implementation of the procedures.**

### **Section V:   Reevaluation**

#### **Summary of Finding:**

During self-assessment, the district accurately identified compliance in the areas of planning meetings, notices, participants at the planning meetings, parental consent, and meetings for students turning age five.

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

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 compliance in the areas of meetings, participants, criteria, and documentation of eligibility.

During the self-assessment process, the district identified concerns in the area of provision of copies of evaluation reports to parents ten days prior to the meeting. Although the district initially identified this as an area of need, the district was able to demonstrate that it has brought about correction in this area.

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 compliance in the areas of age of majority, annual review timelines, and 90-day timelines.

During the self-assessment process, the district identified concerns in the areas of participants, considerations and required statements, goals and objectives related to the Core Curriculum Content Standards, teacher access and responsibility and parent copy

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of IEP prior to implementation. The district's improvement plan is sufficient to address these areas.

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

### **Area of Need:**

**IEP Revisions**—During the on-site monitoring visit, it was determined through staff interviews at Triton High School that IEP meetings are not consistently convened prior to changing programs. It should be noted that this is an area of need at one high school, not systemically throughout the district.

- **The district will revise its improvement plan to include procedures to ensure that throughout the district, IEP meetings are consistently convened prior to implementing any change in a student's program. Implementation of these activities will ensure that all IEP team members, including parents, are involved in and have knowledge of any program changes. The plan must include an administrative oversight component to ensure the consistent implementation of the procedures.**

### ***Section IX: Least Restrictive Environment (LRE)***

#### **Summary of Findings:**

During self-assessment, the district accurately identified compliance in the areas of individualized decision-making, considerations and documentation, supplemental aids and services, regular education access, nonacademic participation, and continuum.

During the self-assessment process, the district identified concerns in the areas of extracurricular participation of out-of-district students and programmatic changes. The district identified lack of procedures and changes not always reflected in the IEP as barriers to compliance. The district's improvement plan is sufficient to address these areas.

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 compliance in the areas of student invitation and agency involvement.

During the self-assessment process, the district identified concerns in the areas of agency invitation, age 14 transition service needs, preferences and interests, courses of study, age 16 needed transition services, and liaison to post-secondary resources. The district's improvement plan is sufficient to address these areas.

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

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### **Section X: Discipline**

#### **Summary of Findings:**

During self-assessment, the district accurately identified compliance in the areas of suspension tracking and manifestation determinations.

During the self-assessment process, the district identified concerns in the areas of procedures, documentation to case manager, behavior intervention plans/functional behavioral assessments, interim alternative educational settings, consultation with the special education teacher and case manager, and IEP meetings. The district's improvement plan is sufficient to address these areas.

Additional areas of need were identified during the on-site visit regarding discipline procedures and administrative exclusion.

#### **Areas of Need:**

**Discipline Procedures**—During the on-site monitoring visit, it was determined through staff interviews that the district has a discipline policy that includes what is called “administrative exclusion”, in which the district requires a student be sent home for a break, but does not count this break as a removal. The administration uses this procedure as a method of decreasing the amount of suspensions in the district.

In addition, it was determined through staff interviews that when a student is suspended from school, the district requires the parent of the student to sign in the student in order for that student to return to school. The district does not count the lapse of days between the last day of suspension and the day the parent comes into the school to sign the student in as days of removal.

- **The district will revise its improvement plan to include procedures for discipline that comply with state and federal regulations. The district must ensure that “administrative exclusion” days are counted as suspension. The plan must include an administrative oversight component to ensure the consistent, compliant implementation of the procedures.**

### **Section XII: Statewide Assessment**

#### **Summary of Findings:**

During self-assessment, the district accurately identified compliance in the areas of participation, approved accommodations and modifications, and IEP documentation.

During the self-assessment process, the district identified concerns in the areas of alternate assessments, Special Review Assessment, and child study team knowledge of content. The district's improvement plan is sufficient to address these areas.

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

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### ***Section XIII: Graduation***

#### **Summary of Findings:**

During self-assessment, the district accurately identified compliance in the areas of IEP requirements, diploma, and participation.

During the self-assessment process, the district identified concerns in the area of written notice of graduation. Although the district initially identified this as an area of need, the district was able to demonstrate that it has brought about correction in this area.

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

### ***Section XIV: Programs and Services***

#### **Summary of Findings:**

During self-assessment, the district accurately identified compliance in the areas of group sizes for speech therapy and home instruction.

During the self-assessment process, the district identified concerns in the areas of class size, age range, and common planning time. The district's improvement plan is sufficient to address these areas. The district further identified concerns in the areas of special class descriptions and supplementary instruction. The district's improvement plan is sufficient to address these areas.

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

### ***Section XV: Student Records***

#### **Summary of Findings:**

During self-assessment, the district accurately identified compliance in the areas of parent and adult student access to records and maintenance of records.

During the self-assessment process, the district identified concerns in the areas of access sheets, destruction, documentation of locations of other records, confidentiality, and knowledge of policies and procedures. Although the district initially identified these as areas of need, the district was able to demonstrate that it has brought about correction in these areas.

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

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### **Summary**

On-site special education monitoring was conducted in the Black Horse Pike Regional School District on October 12, 13, 14, 2004. 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 this review the district was able to identify all areas of need and develop an improvement plan that with some revision, will be sufficient to bring about systemic change. The district is further commended for the prompt implementation of corrective action to address the areas of need identified during the self-assessment process. As a result, many of those identified areas were corrected prior to the on-site monitoring visit. Additionally, the district is commended for the many areas that were determined by the district and verified by the Office of Special Education Programs as compliant with federal and state statutes and regulations.

A review of data indicated the district has increased capacity to meet the needs of students with behavioral disabilities in the district by implementing a program for these students this year. The percentage of students placed in out-of-district settings has decreased overall. The district has decreased the classification rate by providing students with accommodations in general education and providing successful staff training.

At a focus group meeting held following the monitoring visit, parents expressed their satisfaction with many of the district's programs and services. Concerns were raised regarding least restrictive environment, teacher responsibility of IEPs, and inconsistency of case managers. Parents reported that they were satisfied with the academic content and level of curricula for their children stating that they have witnessed improvements in their children's performance and skills.

Standards identified as consistently compliant by the district during self-assessment and verified during the on-site monitoring visit included Evaluation.

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 day and year, facilities, oversight of IEP implementation, certifications, consent, meetings, independent evaluations, referral process, direct referrals, identification meeting participants and timelines, multi-disciplinary assessments, standardized assessments, functional assessments, written reports, bilingual evaluations, acceptance and rejection of reports, reevaluation planning meetings, notices, participants at reevaluation planning meetings, parental consent, eligibility meetings, participants, criteria, documentation of eligibility, age of majority, annual review timelines, 90-day timelines, individualized decision-making, considerations and documentation, supplemental aids and services, regular education access, nonacademic participation, continuum, student invitation, agency involvement, suspension tracking, manifestation determinations, participation in statewide assessments, approved accommodations and modifications, IEP documentation, IEP requirements for graduation, diploma, graduation participation, group sizes for speech therapy, home instruction notifications, parent and adult student access to records and maintenance of records.



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During the self-assessment process, the district identified areas of need regarding professional and parent development, extended school year, provision of counseling services, transfer students, written notice, native language, health summary, vision and hearing screenings, pre-referral interventions, reevaluation timelines, IEP participants, considerations and required statements, goals and objectives related to the Core Curriculum Content Standards, implementation dates, teacher access and responsibility, parent copy of IEP prior to implementation, extracurricular participation of out-of-district students, programmatic changes, agency invitation, age 14 transition service needs, preferences and interests, courses of study, age 16 needed transition services, liaison to post-secondary resources, discipline procedures, documentation of suspensions to case manager, behavior intervention plans/functional behavioral assessments, interim alternative educational settings, consultation with the special education teacher and case manager, IEP meetings, alternate assessments, Special Review Assessment (SRA), child study team knowledge of content, of statewide assessments, class size, age range, common planning time, special class descriptions, and supplementary instruction.

The on-site visit identified additional areas of need within the various standards regarding summer referrals, date of referral, and the use of “administrative exclusion” as part of the disciplinary procedures.

The district corrected many areas of need prior to the on-site monitoring visit, including goals and objectives for related services, provision of adaptive physical education, surrogate parents policy, notices of meetings, provision of evaluation reports to parents ten days prior to eligibility meeting, written notice of graduation, student record confidentiality, access sheets, destruction of files, student records policies and procedures, and documentation of locations of other records.

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