

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

**District:** Bloomfield

**County:** Essex

**Monitoring Dates:** January 29 – February 2, 2001

**Monitoring Team:** Joshua Gillenson, Stephanie DeBruyne, Karen Ellmore

**Background Information**

During the 1999-2000 school year, the Bloomfield School District conducted a self-assessment to determine whether the district's policies and practices regarding the provision of special education programs and services meet federal and state requirements. A steering committee comprised of educators and parents was established to review information relative to this process.

In 1999, parents and staff were invited to attend a public focus group meeting as the first step in the self-assessment process. Based on the information shared at this meeting as well as from other sources, a self-assessment report was developed citing strengths and areas of need. The district has developed activities for improvement in the areas of need identified in their report.

A second public focus group meeting was held in the district on January 17, 2001 prior to the monitoring visit. The monitoring team from the New Jersey State Department of Education facilitated this focus group, which included parents and district representatives. At this meeting, parents reported that though they were pleased with the district's provision of special education programs and services, they identified several areas of concerns.

**Section I: General Provisions**

**Summary of Findings:**

During the self-assessment process, the district identified a need to provide in-service training for staff and administrators who provide regular and special education instruction and related services. The district has developed an improvement plan that is sufficient to address these identified areas of need.

**Section II: Free, Appropriate Public Education**

**Summary of Findings:**

During the self-assessment process, the district identified several areas of need related to extended school year, related services, and facilities. The district has developed an improvement plan that is sufficient to address these areas of need.

Additional areas of need were identified during the on-site visit regarding the Forest Glen program.

**Area of Need:**

**Placement into the Forest Glen School** – The Forest Glen School is a self-contained special education school in the district. There are no general education students in the building and no opportunities for these students to interact with non-disabled peers. In addition to serving students from Bloomfield, Forest Glen is also a receiving school for students enrolled in neighboring communities. A review of the referral, screening and acceptance process for non-Bloomfield students indicated this process is conducted by Forest Glen staff only, excluding Bloomfield’s Director of Special Services and other central administrative staff. As a result of this exclusion, students have not received the services required by their IEPs in a timely manner.

- ◆ **The district will revise its improvement plan to ensure that every individual who is responsible to provide staff for educational programs and services has knowledge of every student being admitted to the Forest Glen program. The plan must include a mechanism to ensure school level administrators comply with these procedures.**
- ◆ **The district will revise its improvement plan to ensure students enrolled in this program are afforded the opportunity to participate in academic and/or extracurricular activities with their non-disabled peers. The plan must include an administrative oversight component to ensure school administrators fully comply with these procedures.**

**Section III: Procedural Safeguards**

**Summary of Findings:**

During the self-assessment process, the district identified numerous areas of need related to Procedural Safeguards. They indicated that timelines, notices of meetings and written notices, native language, independent evaluations, age of majority, and surrogate parents were all areas of need. Many of the problems were identified to be procedural in nature. The district’s improvement plan is sufficient to address these areas of need.

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

**Summary of Findings:**

During the self-assessment process, the district identified an area of need with regard to child find (discussed in the General Provisions section). The improvement plan includes activities that are sufficient to address this area of need.

The district also identified areas of need related to vision/hearing screenings, and health summaries in preparation for identification meetings. The improvement plan includes activities that are sufficient to address these areas of need.

The district also identified a problem with year-round efforts to locate, refer, and identify students including the summertime. Although no activities to address this issue were included in the improvement plan, during the on-site visit the director described specific steps that she had initiated to ensure adequate staffing to complete the referral process during the summer. Specifically, a commitment to fund the additional staffing needs.

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

### **Areas of Need:**

**Direct referral** – Interviews with staff during the on-site visit indicated confusion regarding the referral process.

- **The district will revise its improvement plan to ensure that knowledge regarding the direct referral process is disseminated to district staff. The plan must include the method by which staff will be trained, as well as a system of administrative oversight to ensure correct implementation of the designated process.**

**Referral process** – A review of the district’s Special Services Procedures indicates there is a 15-day delay in forwarding a teacher’s request for an evaluation to the child study team. The procedure requires the teacher to submit the request for an evaluation to the building principal who, in turn, sends a letter of referral notification to the parent. Fifteen days later, the principal forwards the teacher’s referral and a copy of the notice to the parent to the child study team and the special services office.

- **The district will revise its improvement plan to ensure a direct referral is forwarded to the child study team without undue delay to afford the parent the opportunity to participate in an identification meeting within the 20-day timeline required by code.**

## **Section V: Protection in Evaluation and Evaluation Procedures**

### **Summary of Findings:**

During the self-assessment process, the district identified an area of need related to acceptance/rejection of reports prepared and submitted by outside agencies. The district has developed an improvement plan that will sufficiently address this area of need. The district also identified an area of need regarding functional assessments. However, the improvement plan does not include activities to address this area.

### **Area(s) of Need:**

**Functional Assessments** – The district self-assessment identified a need to conduct functional behavior assessments for students whose behavior is a factor in their educational progress. Additionally, the on-site monitoring visit identified functional assessments lacked various required components.

- **The district will revise its improvement plan to ensure that functional assessments are conducted when necessary. The plan must ensure each assessment contains all required components.**

### **Section VI: Reevaluation**

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

During the self-assessment the district identified areas of need regarding reevaluation timelines. The district has developed an improvement plan that will sufficiently address this area of need.

An additional area of need was identified during the on-site visit regarding the reevaluation process.

### **Area(s) of Need:**

**Reevaluation Process** – Interviews and record reviews conducted during the on-site visit revealed the district does not conduct a meeting to review data and determine the need for additional assessments as part of the reevaluation process. Some staff expressed the opinion that because such meetings were too time consuming, they decided to eliminate them. The district is reminded that that meeting may be combined with the eligibility/IEP meeting in the event the parent agrees with the district that no additional assessments are required.

- **The district will revise its improvement plan to ensure that meetings are conducted to determine the need for additional assessments as part of the reevaluation process for all students, every three years or sooner if warranted. Additionally, the plan must include an administrative oversight component to ensure district-wide compliance with these procedures.**

### **Section VII: Eligibility**

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

During the self-assessment process, the district identified problems related to provision of reports to parents, notices components, meeting participants, medical evaluations,

criteria for eligibility for speech language services, and referrals for students with a suspected language disability. The district's improvement plan sufficiently addresses these areas of need.

## **Section VIII: Individualized Education Program**

### **Summary of Findings:**

During the self-assessment process, the district identified areas of need regarding the provision of notices of meetings and written notice, the provision of copies of IEPs to parents, participation of the regular education teacher at meetings, IEP considerations and required statements, implementation of related services, annual review timelines, and reconvening meetings to revise IEPs. At the public focus group meeting, parents reported concerns in some of these areas, specifically regarding the lack of notices provided to them, related services not beginning in a timely manner, and inappropriate procedures to revise IEPs. The district's improvement plan sufficiently addresses all of these identified areas of need.

The district also identified an area of need regarding relating goals and objectives to the core curriculum content standards. Improvement plan activities do not sufficiently address this area of need.

### **Areas of Need:**

**Relating goals and objectives to the core curriculum content standards** – During the self-assessment process, the district identified that goals and objectives were not related to the core curriculum content standards. The district's improvement plan indicated that a new IEP format would be implemented which would contain all of the required components. However, this activity does not address how the district will relate goals and objectives to the core curriculum content standards.

- **The district will revise its improvement plan to ensure that goals and objectives are related to the core curriculum content standards. The plan must include how these standards will be modified/adapted as necessary to meet the individual needs of students.**

## **Section IX: Least Restrictive Environment**

### **Summary of Findings:**

During the self-assessment process, the district identified that students in out-of-district placements have little or no opportunities to participate in extra-curricular activities. The improvement plan sufficiently addresses this area of need.

The district also identified additional areas of need related to access to regular education programs, the continuum of placement options, individual decision-making

regarding placement of students, IEP documentation of the decision-making process, and the provision of supplementary aids and services to support students in regular education. Improvement plan activities will not sufficiently address these areas of need.

### **Areas of Need:**

**Access to Regular Education Programs** – During the self-assessment process, the district identified that there was a need to increase opportunities for students with disabilities to be educated with their non-disabled peers.

The district's improvement plan indicates that in-service training will be provided to administrators and teachers focusing on instructional programs and strategies to foster success of students with disabilities in regular education programs. This activity will not sufficiently address the identified need.

- **The district will revise its improvement plan to include more specificity regarding proposed strategies and techniques to increase the opportunities for disabled students to access regular education programs.**

**Continuum of Placement Options** – During the self-assessment process, the district identified a need to expand the continuum of placements in order to meet the needs of students with disabilities. During the public focus group meeting, parents expressed concerns regarding this issue. They expressed the belief that the district does not offer enough self-contained classes and resource center programs to accommodate the varied needs of students.

During the on-site visit, interviews with district staff confirmed this concern. They indicated that while in-class support has been developed in some schools, it is not available throughout the district. They further indicate that the secondary level schools have limited options regarding self-contained programs. They specifically cite the middle school where every student, requiring a self-contained program is placed in a program for cognitively impaired students, no matter what the individual need may be. The district's improvement plan states a commitment to ensure a broad continuum of placement options for students with disabilities however, this statement of assurance is insufficient to address this area of need.

- **The district will revise its improvement plan to include procedures to ensure a continuum of placement options is available to meet the individual needs of students throughout the district. The plan must include the method the district will use to identify, develop, and provide these programs.**

**Individual decision-making process** – During the self-assessment process, the district identified that placement decisions needed to be based on individual needs rather than on availability of space, related services, and financial constraints. As indicated, the district's lack of a full continuum of placement options has directly impacted on the individual decision-making process. Recommendations for students

are based upon what is available within the district, and not upon individual student needs. Parents at the public focus group meeting confirmed this area of need. The district's improvement plan did not include any activities to address this area.

- **The district will revise its improvement plan to ensure that placement decisions are based upon individual student need. These activities should may be linked to the activities leading to the development of a fuller continuum of program options.**

**IEP documentation of the decision-making process** – During the self-assessment process, the district identified that there was a need to document that regular education was considered for students with disabilities. They further indicated that a consideration of supplementary aids and services, a comparison of the benefits of the regular class placement to the benefits of the special class placement, and the potentially beneficial or harmful effects of placement, needed to be documented within IEPs. The district's improvement plan did not include any activities to address this area of need.

- **The district will revise its improvement plan to ensure that the IEPs document the decision-making process. It is recommended that child study teams attend the LRE Decision-Making technical assistance session provided by the NJ Department of Education and that the district utilize the state-model IEP.**

**Provision of supplementary aids and services to support students in regular education** – During the self-assessment process, the district identified that students with disabilities needed to be maintained in regular education with supplementary aids and services. As reported, the district also identified that IEPs were not documenting the consideration of supplementary aids and services. Furthermore, the district identified that for preschool children with disabilities, the first placement option for preschool children should be regular education early childhood programs with the support of supplementary aids and services. Staff reported a lack of supplementary aids and services throughout the district. Parents indicated that while some schools had supplementary aids and services in place to maintain students in regular education, other schools had limited resources. The district's improvement plan did not include any activities to address this area of need.

- **The district will revise its improvement plan to ensure that supplementary aids and services are available throughout the district to support students in regular education.**

## **Section X: Transition**

## **A. Transition to Preschool**

### **Summary of Findings:**

During the self-assessment process, the district identified a problem with documentation of EIP referrals. The improvement plan includes an activity that is sufficient to address this area of need.

An additional area of need was identified during the on-site visit regarding participation in EIP transition planning conferences.

### **Areas of Need:**

**Participation in EIP transition planning conferences** – The district’s self-assessment indicated that staff are participating in EIP transition conferences. However, a review of records and interviews with staff during on-site monitoring indicated that district staff are not consistently attending these meetings.

- **The district will revise its improvement plan to ensure that staff participate in EIP transition planning conferences on a consistent basis, and that their participation is documented in student records.**

## **B. Transition from school (secondary) to post-school**

### **Summary of Findings:**

During the self-assessment process, the district identified a number of problems related to transition planning/services. The IEP section of the self-assessment document identified the need for agencies to participate in transition planning meetings and, if absent, to be actively involved in the transition planning process. The self-assessment also identified the need to develop alternative strategies in cases when outside agencies do not contribute as expected to student transition planning. The district’s improvement plan sufficiently addresses these areas of need.

The district self-assessment also identified a problem related to the statement of needed transition services for students age 16 or younger. However, the improvement plan is not sufficient to address this area of need.

### **Areas of Need:**

**Statement in IEPs of needed transition services for students 16 or younger-** During the self-assessment process the district identified that IEPs do not consistently contain the statement of needed transition services. The improvement plan does not include an activity to address this area of need.



- **The district will revise its improvement plan to ensure that IEPs contain documentation of needed transition services for students beginning at age 16 or younger, including a statement of interagency responsibilities and linkages.**

## **Section XI: Discipline**

### **Summary of Findings:**

During the self-assessment process the district identified areas of need regarding notification to the case manager, behavioral intervention plans, functional behavioral assessments, and manifestation determination meetings. The district's improvement plan is sufficient to address these areas of need. An additional area of need was identified regarding interim alternative education sites. However, the improvement plan does not include an activity to address this area of need.

An additional area of need was identified regarding disciplinary policies and practices at the Forest Glen School.

### **Areas of Need:**

**Discipline Policy and Practice** - The Forest Glen School discipline manual indicates a student's enrollment may be terminated in response to excessive absences. The manual fails to indicate an alternate means of instruction. Furthermore, this termination of services is done without convening the IEP team, without conducting an IEP meeting and without the involvement or knowledge of central office administrators. As a result, students are not receiving the services they are entitled to receive.

- ◆ **The district will revise its improvement plan to ensure administrators at the Forest Glen School comply with the procedures established in code regarding a termination of services. The plan must include a method that ensures all required participants, including central office administrators, are involved in the process leading to this change in placement. The plan must also include an administrative oversight component to ensure building administrators fully comply with these procedures.**

**Interim alternative education settings** – The district’s self-assessment identified a need to develop interim alternative educational settings in addition to home instruction. However, the improvement plan does not include an activity to address this area of need.

- **The district will revise its improvement plan to include activities that will identify how the district will identify, develop, and provide additional interim alternative placement options for students with disabilities who have been suspended from programs.**

## **Section XII: Statewide Assessment**

### **Summary of Findings:**

During the self-assessment process, the district identified a need related to participation in statewide assessments by students placed in out-of-district programs. The district also identified a problem related to alternative assessments. However, the improvement plan does not include activities to address these areas of need.

### **Areas of Needs:**

**Participation by Out-of-district students in Statewide Assessments** – The district self-assessment identified a need to involve students in out-of-district placements in statewide and district assessment programs with appropriate accommodations. However, the improvement plan does not include activities to address this area of need.

- **The district will revise its improvement plan to include activities that will ensure that students who are placed out-of-district will be afforded the opportunity to participate in statewide and district-wide assessments with appropriate accommodations and/or modifications.**

**Locally determined alternate assessment** – The district self-assessment indicated that Cognitively Impaired students are exempt from the statewide assessment and that no alternative assessment was identified. However, the improvement plan does not include an activity to address this area of need or the issue that students identified within a specific disability category are automatically exempted from participation in statewide assessments.

- **The district will revise its improvement plan to ensure that a specific alternate assessment is identified and utilized for students exempted from participating in statewide assessments. The plan must include procedures to ensure exemption decisions are made based on the individual needs of the students and not determined by the student’s specific disability category.**

## Section XIII: Graduation

### Summary of Findings:

During the self-assessment process, the district identified a need to ensure that all classified students receive notice of and invitation to all high school graduation activities, the need to provide written notice prior to graduation, and the need to notify students in out-of-district placements that they could choose which school would issue their diploma. The district has developed an improvement plan that is sufficient to address these areas of need.

The district self-assessment also identified a need regarding documentation of graduation requirements in IEPs. However, the improvement plan does not include activities to address this area of need.

### Areas of Needs:

**Documentation of graduation requirements in IEPs** – The district self-assessment indicated that IEPs do not include documentation of graduation requirements. However, the improvement plan does not include an activity to address this area of need.

- **The district will revise its improvement plan to ensure that IEPs include the description of graduation requirements for all students with disabilities.**

## Section XIV: Programs and Services

### Summary of Findings:

During the self-assessment process, the district identified that resource program class sizes were oversubscribed. The district's improvement plan is sufficient to address this area of need. The district also identified a need to afford team members more time to complete case management activities. However, the district's improvement plan does not include an activity to address this area of need.

An additional area of need was identified during the on-site visit regarding the submission of home instruction requests to the county office.

### Areas of Need:

**Time for Case Management Duties** – During the self-assessment process, the district identified that child study team members did not have sufficient time to attend to their assigned case management responsibilities. The district reported that this was due to the involvement of team members in a variety of non-special education activities.

- **The district will revise its improvement plan to ensure that child study team members have sufficient time to complete their assigned case management**

**responsibilities. The plan will include a method by which team member assignments will be evaluated and modified to allow full implementation of these procedures.**

**Approvals for home instruction** – During the on-site monitoring visit, a review of records determined that students had been placed on home instruction during the school year. However, the Essex County Office of Education had neither received nor approved any requests.

- **The district will revise its improvement plan to ensure that requests for home instruction are submitted to and approved by the county office prior to the implementation of those services.**

## **Section XV: Student Records**

### **Summary of Findings:**

During the self-assessment process, the district identified areas of need related to access to records. The district has developed an improvement plan that is sufficient to address these areas of need.

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

### **Area(s) of Need:**

**Documentation of other locations** - The cumulative records did not identify the location of other records maintained by the district.

- **The district will revise its improvement plan to ensure that cumulative records identify the location of other records maintained by the district.**

## **Summary**

This on-site monitoring visit was conducted in the Bloomfield School District from January 29 - February 2, 2001, after a public focus group meeting. The purpose of the monitoring visit was to verify the district's report of self-assessment findings and assess the appropriateness of the resulting improvement plan. The district should be commended for its comprehensive approach to the self-assessment process that has resulted in the district being able to self-identify nearly all areas of need as well as develop a comprehensive improvement plan to facilitate systemic changes.

As reflected in the self-assessment, the district identified areas of need pertaining to staff development; policies and procedures; timelines; facilities; child find; extended school year; related services; functional assessments; transition services (age 16 and under); the referral process; eligibility meetings; IEP documentation; discipline procedures; statewide assessment; graduation participation; and class size.

In addition to the areas of need identified during the self-assessment process, the on-site monitoring team identified other areas related to, direct referrals by teachers; planning meetings; individual decision-making process; transfer students; participation in EIP transition planning meetings; and home instruction approvals.

Within forty-five (45) days of receipt of this monitoring report, the district will revise and resubmit the improvement plan to the Office of Special Education Programs.