



**COPY**

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GOVERNOR

March 21, 2000

Dr. Leonard D. Fitts  
Interim Superintendent  
Camden City School District  
201 N. Front Street  
Camden, NJ 08102

Dear Dr. Fitts:

For nine days in November (November 1, 3, 4, 8, 9, 10, 15, 16, & 17, 1999), the New Jersey Department of Education (NJDOE) conducted a monitoring visit to determine your district's compliance status with regard to the implementation of the Individuals with Disabilities Education Act (IDEA).

While it was determined that Camden City has some noteworthy programs, a number of areas were found to be in need of correction, and are addressed in detail in the enclosure to this letter.

The district must take action to ensure the prompt and effective correction of all areas in need. An Improvement Plan is to be developed, with specific steps and timelines that will ensure that all of the deficiencies in this report are fully corrected and that the district is in compliance. You are encouraged to contact the County Supervisor of Child Study for technical assistance in developing the improvement plan. The plan is to be submitted to the County Office for approval within 45 days of your receipt of this report.

I would like to thank you and your district staff members who participated in the monitoring process, for the cooperation demonstrated to the monitoring team. We are committed to working with you and your staff to bring Camden City into compliance with

these requirements, and will remain available to provide technical assistance throughout this process.

Sincerely,

A handwritten signature in black ink, appearing to read "Daniel R. Mastrobuono". The signature is fluid and cursive, with the first name "Daniel" being the most prominent.

Daniel R. Mastrobuono, Ed.D.  
County Superintendent of Schools

DRM:CMC

Enclosure

c: Barbara Gantwerk, Director, Office of Special Education Programs  
Caryl Carthew, Child Study Supervisor  
Arlene Roth, Camden City Task Force  
Cathleen Jenkins, Acting Director of Special Services

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

**District:** Camden City

**County:** Camden

**Monitoring Dates:** November 1, 3, 4, 8, 9, 10, 15, 16, and 17, 1999

**Monitoring Team:** C. Carthew, C. Curley, E. Lerner, J. Marano, T. Radbill, and G. Shellem.

**Background Information**

The monitoring of Camden City began in earnest on October 21<sup>st</sup>, when together, the Public schools of Camden and the NJDOE held a focus group meeting for parents at the Hatch Middle School. Though the turnout was disappointing, we did gain valuable information and insight into the task that stretched out before us. From that initial focus group meeting we identified certain themes that we would later verify during the on sight visit.

The monitoring of Camden City's special education programs in reality had begun even before the focus group meeting. Valuable information from previous federal monitoring, program review activities, complaint investigations and the 1999 OSEP transition technical assistance report were available to the team and would also help to shape the focus of our onsite visit.

Our goal was to pull together information from the focus group meeting and the previous monitoring activities, and then to verify problem areas through onsite review of student records, interviews and classroom observations and lastly, to identify systemic areas of non-compliance.

During the on-site visit, NJDOE team reviewed district documentation, including district policies and procedures, student count information, master student lists, class lists, schedules of students, teachers, and related service personnel, contracts with outside agencies, and other relevant information, including a representative sample of student records. Interviews were conducted with the district's special education director and supervisors, building principals, central office supervisors, and child study team members, including speech-language specialists. Input was also received from parents of students with disabilities. In addition, fourteen of the district's school buildings were visited and representative samples of general and special education teachers from each site were interviewed.

District compliance with the requirements of the Individuals with Disabilities Education Act (IDEA) and the New Jersey Administrative Code for Special Education (N.J.A.C. 6A: 14) was assessed. Areas of strength and areas of need were noted. Areas of potential noncompliance were investigated and analyzed to determine their nature and scope. Systemic (i.e., significant) issues of noncompliance are identified in the findings below.

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**Noteworthy Programs and Practices**

**The Junior Leadership Cadet Corp** provides students the opportunity to develop self-esteem and confidence and is available to students with disability. Staff have cited it as a valuable tool for students with disability to interact on an "equal" basis with their non-disabled peers, and on occasion rising above to a leadership position.

**Speech Camp** provides enrichment activities in an informal setting for eligible students during the summer.

**Co-Teaching** is a bright spot and could greatly decrease the number of students who are served in segregated special education settings.

**Unified Special Olympics** provides recreational activities for both students with disabilities and non disabled students and is additional opportunity for students to experience mainstreaming in an informal setting.

**Statement of Findings**

In general, our findings indicate that Camden City does not do an adequate or consistent job of documenting some of the critical decisions that form the basis of special education programming. Because of the failure to adequately document these decisions, some good efforts by district staff may go unnoticed. There is also a failure on the part of Camden City to monitor its' own system and procedures, thus incomplete forms, lack of required components and inconsistency goes unnoticed and uncorrected.

**I. General Provisions**

The district board of education provides publicly funded educational programs and services to students with disabilities.

Annually, the district submits the required reports related to: the number of students with disabilities enrolled in the district; staff (including contracted personnel) providing services to students with disabilities; and the number of students with disabilities who are exiting education. The district does not consistently make available to parents of students with disabilities and to the general public all documents relating to the eligibility of the district under Part B of the IDEA. While the district has policies in effect, because of recent changes and clarifications at the state level, the district must request the Board to adopt the policies and submit the statement of assurance as requested. Written procedures to implement special education programs are in need of review and revision as currently they are implemented inconsistently and often lack sufficient clarity to enable practitioners to fully comply. Again, the district should align its procedures with its policies and utilize the guidelines issued recently by the state. To ensure that students with disabilities and their parents are afforded procedural safeguards.

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Areas of Need:

There is a need to demonstrate a comprehensive approach for assuring that staff gain needed skills, these skills are maintained, and as changes occur, skills are brought up to date. While the district conducts numerous staff development activities throughout the year, the lack of coordination between and among departments hampers a coordinated approach throughout the district.

- The district is directed to develop an improvement plan that ensures the provision of a more coordinated, relevant set of professional development activities that will enable staff to effectively implement the strategies, techniques, and skills presented.

↓  
proced. ← topics manual

While constraints do impede efforts to maintain and acquire staff, adequate personnel to provide services to students with disabilities must be maintained. Current procedures must be reviewed and strategies to ensure that administration and the Board moves more aggressively to fill vacancies must be established.

- The district is directed to develop an improvement plan that ensures its ability to maintain sufficient staff. That plan must include strategies to ensure the timely employment of additional staff when vacancies occur.

There is a need to identify a more comprehensive and effective system to supervise staff and processes. Currently, the district is unable to ensure the implementation of compliant procedures due to its inability to adequately monitor and oversee staff and the activities performed by staff.

- The district must revise its current organizational structure to ensure a more effective system of oversight and supervision. This structure must include specific job responsibilities and must identify the chains of command and communication.

**II. Free, Appropriate Public Education**

Programs are administered, supervised and provided by appropriately certified and/or licensed professional staff members. Programs are located in facilities that have been approved by the Department of Education, and which are accessible to the disabled. The length of school day and academic year for students with disabilities is at least as long as that established for non disabled students, and transportation for students in out-of-district placements is provided consistent with the school calendar of the receiving school. Physical education (regular, modified or adaptive) is provided for all students with disabilities, including those students in separate facilities. The district does not however, consistently provide appropriate special education and related services to students with disabilities age three through twenty-one at public expense, under public supervision and with no charge to the parent.

The utilization of Co-Teaching in the district is a bright spot, although it's implementation is fraught with inconsistencies and numerous procedural violations. This program has the potential to greatly decrease the number of students who are served in segregated special education

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settings. School level monitoring of its implementation is crucial to ensure that the goals of Co-Teaching are achieved. Several schools have eliminated options and implemented an all or nothing approach to Co-Teaching. Several teachers who felt students could benefit from these options were told not to discuss or include this option in the IEP. The district must continue to develop this approach and review and revise planning, procedures, training, and implementation to ensure appropriate utilization of this placement option. The district ensures that hearing aids worn by deaf and hard of hearing students in school are functioning properly.

Areas of Need:

Student services - Students were not being provided services as indicated in their IEPs. At several schools, IEPs indicated services were not being delivered because of staffing issues. The administration and Board of Education must act aggressively to fill vacant positions and to accommodate employees on medical LOA so students received IEP specified services.

- The district is directed to develop an improvement plan that ensures the provision of services required by IEPs in the event that staffing vacancies occur.

*redeploying  
staff  
per diem  
pay*

Transfer services - Services to transfer students were untimely, hampered by cumbersome procedures, and provided without written notice. When a student with a disability transfers into the district, the district does not consistently conduct an immediate review of the evaluation information and the IEP. As a result, IEPs are not implemented as written, and/or interim IEPs are not developed. Entry dates have not always been documented, and in those cases where records from the previous school district are incomplete or unavailable, transfer students are not always placed into interim educational programs consistent with the available information, and IEPs are not developed and/or revised without delay. Appropriate written notice of the decision of the district is not provided to parents.

- The district is directed to develop an improvement plan that ensures compliance with code mandated procedures. The plan must include procedures for an immediate review of the IEP, implementation of that IEP or an interim IEP in the event a program/placement dispute arises, and the provision of notice to the parent regarding the proposed interim placement.

*home  
school*

Extended School Year - The district does not ensure consistently that a free, appropriate public education is available to all students with disabilities between the ages of three and twenty-one, specifically with regard to an extended school year. Although the district offers various summer enrichment programs, as well as a summer camp for preschool children with disabilities, extended school year programs are not considered for all students with disabilities regardless of disability category or placement. Student records lacked documentation of individualized determinations regarding the need for an extended school year program, and interviews confirmed that extended school year programs were discussed and provided mainly for those students with disabilities who were placed in out-of-district programs.

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- The district is directed to develop an improvement plan that ensures ESY programs are considered for all classified students and that those considerations are appropriately documented in each IEP.

Provision of Programs and Services – Related Services. The district does not consistently ensure that educational programs and related services are provided to meet the individual needs of students with disabilities, specifically with regard to the provision of speech-language services and guidance counseling. Services were provided on a standard basis, rather than on an individualized basis according to student need. Interviews indicated that these services did not usually begin until one month after the start of the school year, due to the amount of time needed for scheduling and preparation. In addition, Individualized Education Programs (IEPs) indicated that students with disabilities received ‘guidance counseling’ as a related service, and its provision was too often a standard of one time per week for thirty minutes per session.

- The district is directed to develop an improvement plan that ensures that related services are individually determined and provided in accordance with the timelines established in the IEP.

**III. Procedural Safeguards**

In general, there was a general lack of consistency and demonstration that staff used or understood the purpose of the procedural safeguards. Written notice was often incomplete or inadequate. Interviews and record review supported the lack of school level oversight to the provision of procedural safeguards to ensure correct letters were used, appropriate personnel attended meetings, and timelines were maintained.

There are policies and procedures in place regarding the provision of an independent evaluation. This issue was the subject of a complaint investigation during the 1998-99 school year and a current Corrective Action Plan is in place. During the current school year, the district has indicated that no new independent evaluations have been requested.

Camden is a city of diverse cultures and while policies and procedures are in place to provide written notice to parents in their native languages, better response to non-English speaking parents is needed. Notices of meetings, though provided to parents, were neither provided consistently nor provided consistently in the native language of the parent. In addition, interviews indicate that the district considers the IEP to be written notice, however, no IEP’s were provided in languages other than English.

While the district has situations that involve foster parents, there are no cases requiring surrogate parents.

Areas of Need:

The district does not consistently obtain consent prior to conducting any initial evaluation, implementing the initial IEP, conducting any reevaluation, and releasing student records. In

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addition, the district does not implement, without undue delay, the action for which consent was granted.

- The district is directed to develop an improvement plan that ensures it obtains consent prior to conducting initial evaluations, prior to conducting additional assessments for a reevaluation, prior to implementing an initial IEP, and prior to releasing student records. The plan must also include a component that ensures the immediate implementation of the action for which consent was obtained.

The district has not implemented a process to inform the parent and student that all rights will transfer to the student on reaching the age of majority, at least one year before the student reaches age eighteen.

- The district is directed to develop an improvement plan that ensures that parents and students are appropriately notified in a timely manner that all rights transfer when the student reaches the age of 18.

Parents and adult students are sent written notice of a meeting early enough to ensure they will have an opportunity to attend, however, meetings are not scheduled at a mutually agreeable time and place. Parental turnout for meetings is low, and the district does not document that it employs a number of strategies to ensure parental participation at meetings.

- The district is directed to develop an improvement plan that ensures the appropriate documentation of all attempts to afford parents the opportunity to participate at meetings.

Written notice is not consistently provided when required, nor does it reflect the required components.

- The district is directed to develop an improvement plan that ensures notice is provided whenever required by code. The district must also revise its notices to ensure they contain all required components.

Notices of meetings are not consistently provided in the native language of the parent. While the district considers the IEP to be written notice, no IEPs were provided in languages other than English.

- The district is directed to develop an improvement plan that ensures it provides notice and copies of IEPs in the native language of the parent whenever feasible.

**IV. Location, Referral and Identification**

The district has written procedures for students ages three through twenty-one, including students attending nonpublic schools who reside within the district to locate, refer and evaluate students, however these procedures are inadequate, or not implemented on a consistent basis.



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A clear delineation of procedures and an understanding of those procedures by staff was absent as indicated both in record review and interviews. There was a lack of clear documentation of identification/evaluation meeting. Not all required staff attended meetings. Meetings were held without parental participation and without adequate documentation of attempts to involve parents. Regular education interventions were only spottily documented; despite procedures in both PAC and special education to do so. The district has the opportunity to review and revise its policies and procedures using the guidelines provided by OSEP; the district must carefully review its procedures and devise and develop a smooth interface between regular and special education.

Areas of Need:

The district does not consistently convene identification meetings with all required participants within 20 days of receipt of the referral. Parents are provided with inadequate notice of the meeting and attempts to involve parents are insufficient. The process, which includes the review of existing evaluation data and the determination of whether an evaluation is warranted, is inadequately documented. Written notice of the evaluation determination is not consistently provided to the parent within 15 days of the meeting with all required components.

- The district is directed to develop an improvement plan that ensures the convening of an appropriate team of individuals to conduct an identification meeting within 20 days of receipt of a request for an evaluation, to review all available data and determine the need for an evaluation.

Although the district's written procedures indicate that interventions in the regular education program are not a prerequisite to evaluation, interviews indicated that direct referrals to the child study team are accepted only from parents and outside agencies. In addition, some parent referrals are first directed through the Pupil Assistance Committees. There were inconsistencies in PAC procedures from building to building.

- The district is directed to develop an improvement plan that ensures, on a consistent basis, the opportunity for district personnel, agencies, and parents to directly refer a child to the child study team.

The district has an established system of regular education intervention, however, written documentation of the implementation and effectiveness of the interventions was not always evident.

- The district is directed to develop an improvement plan that ensures the documentation of interventions in the general education setting as well as the effectiveness of those interventions.

Referrals that are received by the district during the summer months are often delayed. Interviews indicate that personnel are not consistently available.

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- The district is directed to develop an improvement plan that ensures compliance with all referral and evaluation timelines required by code throughout the year, including summer months. The plan must include a component that identifies how staffing needs will be met during the summer in the event vacancies cannot be filled.

The district has procedures in place to provide written notice of the results of the identification meetings; however, the notice does not contain all the required components. Evaluation plans do not adequately address the reasons for referral and the results of the review of available data. The notice also does not contain a statement that the student has been identified as potentially disabled. In addition, documentation of meeting participants is often not available.

- Corrective action is addressed in Section III Procedural Safeguards.

Audiometric and vision screening has not consistently been conducted for every student referred for a special education evaluation, especially, for preschool age children.

- The district is directed to develop an improvement plan that ensures that audiometric and vision screenings are conducted for all students initially referred for an evaluation.

**V. Protection in Evaluation and Evaluation Procedures**

The district ensures that evaluation procedures are technically sound, are neither culturally nor racially discriminatory, and are administered by trained personnel.

The district has procedures in place to ensure that students with disabilities receive a comprehensive evaluation.

However, the district does not consistently ensure that appropriate evaluation procedures are followed to determine students' eligibility for special education and related services, in the following areas:

Areas of Need:

Although functional assessments have been conducted, they have not consistently included structured observations.

- The district is directed to develop an improvement plan that ensures observations are conducted and documented as part of functional assessments.

The individuals who conducted the assessments did not consistently sign written reports. In addition, written reports of the results of the assessments have not consistently included:

- a) An analysis of the instructional implications appropriate to the professional discipline of the evaluator, and

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- b) A statement regarding relevant behavior of the student (either reported or observed), and the relationship of that behavior to the student's academic functioning.
- The district is directed to develop an improvement plan that ensures that all written assessment reports contain the components required by code including the signature(s) of the person(s) completing the report.

Acceptance or rejection of reports and assessments submitted to the IEP team for consideration has not consistently been noted in writing.

- The district is directed to develop an improvement plan that ensures that reports submitted to the district for consideration during the evaluation process are either accepted or rejected. Documentation of either action must be maintained.

**VI. Reevaluation**

The district has policies and procedures to ensure that students with disabilities are evaluated every three years or sooner if conditions warrant. However, documentation did not contain information in sufficient detail to satisfy the requirements for notice.

Areas of Need:

Although a multi-disciplinary reevaluation is conducted within three years of the previous classification, there was inconsistent documentation in the student records to confirm that the IEP team reviews existing data to decide whether additional data are needed to determine continued eligibility and subsequent programmatic information. In addition, documentation in files and interviews confirmed that staff had not assimilated the regulatory changes as they pertain to reevaluation, thus appropriate personnel were often not in attendance.

- The district is directed to develop an improvement plan that ensures the convening of an appropriately configured IEP team at meetings. The plan must also include a component that indicates how the district will document the review of existing data and the decisions made subsequent to that review.

**VII. Eligibility**

The district does not consistently ensure or appropriately document that a student is determined eligible for special education and related services (or eligible for speech-language services) at a meeting with the required participants.

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Areas of Need:

Although records indicate that eligibility meetings are conducted, the records lacked consistent documentation that notice of the meeting is provided. In addition, notices that were available did not include PRISE when the purpose of the meeting was also to develop an IEP. There was no consistent documentation in the student records to confirm that a copy of the evaluation report(s) is given to the parent or adult student.

- Corrective action is addressed both in Section III Procedural Safeguards and the directive below.

Documentation of eligibility is not consistently provided within the required 15-day timeline. District procedures indicate that this is to be documented through the IEP, although this information is often left blank. There is no consistent documentation as to how students meet the appropriate criteria for eligibility. There was no evidence of a collaborative summary identifying the results and recommendations of evaluations.

- The district is directed to develop an improvement plan that ensures parents are provided with a copy of the evaluation reports and the statement of eligibility within 15 days of the eligibility meeting.

There is no clear relationship between evaluation findings and proposed educational program established in the available documentation. Many of the required IEP components are missing or inadequately addressed. Inconsistencies identified in student records and confirmed through interviews raised questions as to whether staff understood why they were completing certain sections of the form.

- Corrective action is addressed in Section VIII IEP.

**VIII. Individualized Education Programs**

The district does not adequately ensure that IEPs are implemented and in effect as required. Nor does the district ensure that IEPs are reviewed at least annually. Parents are not provided copies of IEPs as indicated by student records and supported by interviews. The district does not consistently ensure that the appropriate team members conduct an IEP meeting to develop, review and if necessary revise the IEP, specifically with regard to the attendance of general and special education teachers. The IEP documentation does not clearly indicate if CST member is assuming more than one role in the meeting.

In addition, the district does not consistently ensure that IEPs are developed with the appropriate considerations and contain the required statements. The district does not document efforts to ensure parental participation. For the most, part annual reviews were completed in a timely fashion. However, there were several instances when revisions were made without convening an IEP meeting. The district's IEP document fails to comply with required components and staff fails to adequately complete the form. It is recommended that the district use the OSEP

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suggested IEP format and focus effort on training staff in the appropriate process for making IEP decision.

While IEPs are generally developed prior to the beginning of the school year, identified services are not consistently provided to students. Because of this failure to adequately document these decisions some good efforts by district staff may go unnoticed. There is also a failure on the part of Camden City to monitor its own system and procedures, thus incomplete forms, lack of required components and inconsistency goes unnoticed and uncorrected.

Areas of Need:

General and special education teachers provide written input for consideration at IEP meetings, but they are not consistently in attendance at these meetings.

- The district is directed to develop an improvement plan that ensures the convening of an appropriate team at all IEP meetings.

IEPs did not consistently document consideration of the following:

- a) The strengths of the student and the concerns of the parents for enhancing the education of their child;
- b) The communication needs of the student; and
- c) Whether the student requires assistive technology devices and services; and
- d) In the case of a student whose behavior impedes his or her learning or that of others, strategies (including positive behavioral interventions and supports) to address that behavior. Behavioral Intervention Plans were not evident for students identified as having behavioral issues.

- The district is directed to develop an improvement plan that ensures IEP contain all of the components and statements required by code. It is recommended that the district use the state developed IEP form and provide technical assistance to its staff regarding the manner in which the form needs to be completed.

IEPs did not consistently include the following required components:

- a) The special education and related services and supplementary aids and services that will be provided for the student, or a statement of the program modifications or supports that will be provided for school personnel on behalf of the student;
- b) The transition service needs and/or needed transition services for the student, including interagency responsibilities or linkages, when appropriate; and
- c) The person(s) responsible to serve as a liaison to post-secondary resources and make referrals to the resources as appropriate.
- d) Written notice is not consistently provided nor does it contain all required elements

- The district is directed to develop an improvement plan that ensures that IEPs include all required components.

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**IX. Least Restrictive Environment**

The district's profile shows improvement and movement towards education in less restrictive environments. However, placement decisions are still inappropriately based on category, attitude, and lack of training of regular education teacher. As was indicated early, Co-Teaching can be an important catalyst as a tool for training regular education teachers and as an effect less restrictive placement option if used appropriately.

As a result of this review, it was determined that the district still has not consistently ensured that to the maximum extent appropriate, students with disabilities age three to twenty-one are educated with students who are not disabled.

Areas of Need:

Placement in the least restrictive environment is not consistently ensured due to limitations in the continuum of alternative placements available. Specifically, in-class support is provided only sporadic and there is much confusion regarding the requirements for various placement options along the continuum. When determining the educational placement of each student with a disability, the IEP team did not consistently document that consideration was given at each IEP meeting to:

- a) Whether the student can be educated satisfactorily in a regular classroom with supplementary aids and services, including preschool children with disabilities;
- b) A comparison of the benefits provided in a regular class and the benefits provided in a special education class; and
- c) The potentially beneficial or harmful effects which a placement may have on the student with disabilities or the others in the class.

- The district needs to more effectively implement the CAP developed in response to Program Review findings for the 1998-1999 school year.

**X. Transition**

**Transition from School to Post-School**

In July 1999, NJDOE representatives visited the district and identified deficiencies in the area of post-secondary transition, and provided technical assistance for improvement. Issues included: documentation of student invitation to the IEP meeting; documentation of the process used to determine student interests and preferences; IEP documentation of: the statement of transition service needs, the statement of needed transition services, justification for not providing transition services, and alternate strategies for agency failure to provide transition services; agency invitation to meetings for in-district students; increased internal procedures to ensure the involvement and participation of identified agencies when they fail to send a representative to the meeting; re-wording of the required transfer of rights and parent notification.

The district is in the process of implementing the recommendations for improvement found in the report issued previously by OSEP. The district needs to follow the areas identified in that

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report as the critical areas in developing their CAP. Staffing issues were raised during interviews and the district needs to carefully consider this issue as it develops its CAP. During our visit we confirmed continuing problems in the following areas. The district should strongly consider use of the state developed IEP form.

Areas of Need:

Transition requirements are not being met consistently.

- a) Students are not consistently being invited to IEP meetings when transition is to be discussed. Often, when they are invited, they are invited orally on the day of the IEP meeting. This was also the case for students 18 years or older.
  - b) Invitation to the meeting should be explained to students. Activities should be implemented to ensure that students are prepared for an active role in the transition process. These activities should include a process that involves activities, assessments, and determination of students' interests and preferences that can then become the focus of the meeting.
  - c) There is insufficient and incomplete documentation that students, 14 and older are interviewed prior to meetings. Sample IEPs need to be more descriptive in the area of students' interests and preferences.
  - d) The Statement of Transition Services needs clearer documentation of required content. Course of study information should include dates when courses will be taken, consider student interests when considering interests and preferences, courses identified for each student should relate to identified and desired post-school outcomes.
  - e) The Statement of Needed Transition Services had several required sections missing. Reviewed files did not contain a clear relationship between goals and objectives and post school outcomes. While many activities were checked off, there was no indication of where activities would take place.
  - f) There was no relationship between goals and objectives, the courses of study and transition planning.
  - g) There was no documentation that students, 14 years and older, participated in IEP transition planning.
  - h) There is a disparity of program offerings between Woodrow Wilson and Camden High
  - i) Children with disabilities had little or no opportunity for community or employment experiences.
  - j) The child study team has expressed concerns that career exploration and career preparation are needed program development areas.
  - k) Team indicated that it is not realistic to be expected to write compliant IEPs if there are no programs and services.
  - l) The district efforts to ensure involvement by outside agencies is inadequate, and little documentation of efforts described in interviews was found during record review.
- The district is directed to develop an improvement plan that includes procedures to correct areas of noncompliance. These areas include: documentation of student invitations to transition meetings; development of IEPs that include all required transition statements and components; provision of access to all classified students, as determined appropriate by the IEP team, to programs and services in both high

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schools; the expansion of educational, community, and employment options for students with disabilities; and the increased effort to ensure the participation of outside agencies at transition meetings.

**Transition to Preschool**

A child study team member of the district does participate in the preschool transition planning conference arranged by the Department of Health and Senior Services, to help facilitate the transition from early intervention to preschool. The majority of preschoolers with disabilities do have their IEPs implemented prior to the age of three. There is not, however as smooth a transition from Early Intervention into preschool as one would like.

Areas of Need:

Many of the procedural difficulties that exist in the district process for location, referral, and evaluation are apparent in this process as well.

- This CAP is already addressed in Section IV above.

**XI. Discipline**

The district does not consistently ensure that appropriate disciplinary measures are implemented for all students with disabilities when disciplinary action is required.

There are major problems in the manner in which the district handles disciplinary matters. Key individuals have not assimilated the concepts; and the procedures are poorly understood and implemented.

- The district is directed to develop an improvement plan that ensures that discipline requirements are understood and implemented by all district personnel who actively participate in disciplining students with disabilities. The plan must include professional development and an oversight system to ensure the implementation of these procedures on a district-wide level.

**XII. Statewide Assessment**

The district has begun to ensure that students with disabilities participate in Statewide assessments, however, many administrators and teachers do not yet fully understand the reason and implementation has been inconsistent.

- The district is directed to develop an improvement plan that ensures the consistent implementation of procedures regarding the participation of disabled students in state-wide assessments. This plan must include professional development to ensure the consistent implementation of these procedures on a district-wide level.



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**XIII. Graduation**

The IEP of a student with a disability who enters a high school program does not fully address the student's graduation requirements or contain appropriate statements and rationales for exemptions. If a student attends a school other than that of the district, the student has the choice of receiving the diploma of the school attended or the diploma of the district of residence. Students who meet the standards for graduation requirements have the opportunity to participate in graduation exercises and related activities on a nondiscriminatory basis.

- This CAP is already addressed in IEP section.

**XIV. Programs and Services**

The district does not ensure consistently that programs and services are provided according to the IEP or State requirements. The district's internal monitoring system for ensuring that student needs are served according to the IEP and that service providers provide services as indicated in the IEP is inadequate. School level oversight is in many cases non-existent. Administration and the Board have allowed vacancies to go unfilled far too long. Although administration was aware of problems confronting their recruitment efforts, little creativity has been evidenced to correct the problem. A comprehensive review and revision of its policies, procedures, and practices in this area prior to the development and the CAP will be required for the district to come into compliance.

- This CAP is already addressed in IEP section.

**XV. Student Records**

The district permits the parent and adult student to inspect and review any student records related to that student which have been collected, maintained or used by the district. Parental or adult student inspection and review of student records is permitted without unnecessary delay and before any meeting regarding the IEP.

Areas of Need:

The district does not consistently maintain a record of the parties other than parents, students or other individuals who are assigned educational responsibility who obtained access to a student's record.

- The district is directed to develop an improvement plan that ensures the appropriate documentation of access by individuals who do not have assigned education responsibility.