

**THE NEW JERSEY DEPARTMENT OF EDUCATION  
SPECIAL EDUCATION MONITORING**

**District:** Clementon Borough School District

**Monitoring Dates:** April 27, 28, 2004

**Monitoring Team:** Ken Richards and Patricia Fair

***Background Information:***

During the 2002 - 2003 school year, the Clementon Borough School District conducted a self-assessment of policies, procedures, programs, services and student outcomes. This self-assessment component of the monitoring process provided the Clementon Borough School District with an opportunity to evaluate its strengths and areas of need with regard to:

- The provision of a free and 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 Clementon Borough School District developed an improvement plan to address the 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 Clementon Borough Elementary School on April 20, 2004. Information obtained from the meeting was used to direct the focus of the monitoring visit.

During the on-site visit, the NJDOE team reviewed district documentation, 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, and child study team members.

**District Strengths:**

The district provides preventative programs which include regular four-year-old preschool, full-day kindergarten, Reading Recovery, Fast ForWord, after-school tutoring groups, homework club and cross-age mentoring programs that are available to all students. In addition, Conflict Resolution has been a recent focus for training of both

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staff and students and peer mediation programs include all students at participating grade levels.

**Part One Data Summary:**

A review of district data indicates that for the past three years, the district is placing fewer students in general education settings for more than 80% of the day. The on-site monitoring identified this as an area of need because the district does not consider educating many of their students in general education settings as the first option. Additionally, the district reported a high rate of students placed in out-of district settings - 16.3% as compared to the state average of 9.1%. They indicated that these students transferred into the district from other districts and are already placed in private and public segregated settings. Here again, the district has not taken any action to address this need by creating in-district programs to address the needs of these out-of-district students.

***Areas Demonstrating Compliance with all Standards:***

**Reevaluation, Statewide Assessments, Graduation Requirements, Programs and Services and Student Records** were determined to be areas of compliance by the district during self-assessment and by the Office of Special Education Programs during the on-site visit.

***Section I. General Provision***

**Summary of Findings:**

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

During the self-assessment process, the district identified a need for additional staff training. The district's improvement plan is sufficient to address this area of need.

No addition areas of need were identified during on-site monitoring.

***Section II. F.A.P.E.***

**Summary of Findings:**

During self-assessment the district accurately identified themselves compliant in the areas of provision of programs, length of school day and year, transfer students, facilities and certifications.

During the self-assessment process, the district identified concerns in the area of provision of speech and language services. The district had corrected provision of related services prior to the on-site monitoring.

Additional areas of need were identified during on-site visit regarding extended school year and frequency, location, and duration of services.

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**Areas of Need:**

**Extended School Year** – During the on-site visit it was determined through record review and staff interviews that extended school year services are not consistently considered for all students.

- **The district will revise its improvement plan to include activities to ensure that extended school year is considered for all students. The implementation of these activities will result in the discussion of the need for extended school year services for all students and for the provision of services for those students with issues related to regression/recoupment. The improvement plan must include an administrative oversight component to ensure the consistent implementation of these activities.**

**Frequency, Location, and Duration and Description of Programs** – During the on-site visit it was determined through record review that frequency, location, duration and descriptions of programs are inconsistently documented in IEPs. IEPs indicated ranges of time but did not describe the instruction that was to be provided, the frequency of the programs, or the location.

- **The district will revise its improvement plan to include activities to ensure that IEPs indicate the program to be provided and the specific frequency and duration and location of the program. This will ensure that student's receive the programs and services agreed to by the members of the IEP team. The improvement plan must include an administrative oversight component to ensure the consistent implementation of these activities.**

***Section III. Procedural Safeguards***

**Summary of Findings**

During self-assessment the district accurately identified themselves compliant in the areas of consent, notice in native language, interpreters at meetings and independent evaluations.

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

Additional areas of need were identified during the on-site visit regarding notice of a meeting and written notice.

**Areas of Need:**

**Notice of a meeting** – During the on-site visit it was determined through record review and staff interviews that when it is determined that a student is found eligible for special education and related services or eligible for speech and language services the district proceeds to the development of the IEP without informing the parent in the notice of a meeting that this will occur.

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- **The district will revise its notice of a meeting to ensure it informs parents that if the student is found eligible for special education and related service or eligible for speech and language services they will proceed to the development of an IEP. This will result in parents receiving proper notification of the purpose of the meeting. It is recommended the district adopt the notice forms developed by the Office of Special Education Programs.**

**Written Notice** – During the on-site visit it was determined through record review that written notice does not contain placement options considered and rejected.

- **The district will revise its written notices to ensure they contain all required components. This will ensure that parents are fully informed of actions proposed or denied by the district. It is recommended the district adopt the notice forms developed by the Office of Special Education Programs.**

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

**Summary of Findings:**

During self-assessment the district accurately identified themselves compliant in the areas of referral process, pre-referral interventions, direct referrals, identification meeting timelines and participants.

During the self-assessment process, the district identified concerns in the areas of child find, health summary, and vision and hearing screenings. **The district's improvement plan is insufficient to address the areas of health summary and vision and hearing screenings because although the plan indicated that forms would be revised to include vision and hearing and health summaries and staff would be in-serviced on the new forms, there is no administrative oversight to ensure the activities will occur. The plan needs to be revised to include this component.** The district corrected child find procedures prior to the on-site visit.

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

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

**Summary of Findings:**

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

An area of need was identified during the on-site visit regarding acceptance/rejection of outside reports.

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**Areas of Needs:**

**Accept and rejection of outside reports** – During the on-site visit it was determined through record review that the district does not document the acceptance and rejection of outside reports. As such it could not be verified that these reports were in fact considered by the district.

- **The district will revise its improvement plan to include activities to ensure that the district conducts a review of reports/information submitted by the parent and documents the acceptance/rejection of the entire report or assessment or any part of the assessment. This will ensure reports are considered by the district and will inform parents of the reasons for rejection of the whole or part of the report in the event there is a rejection. The plan must include an administrative oversight component to ensure the consistent implementation of the procedures.**

***Section VII. Eligibility***

**Summary of Findings:**

During self-assessment the district accurately identified themselves compliant in the areas of meeting/participants, criteria, statement of eligibility, signatures of agreement/disagreement rationale.

An area of need was identified during the on-site visit regarding the provision of a copy of evaluation reports 10 days prior to the eligibility meeting.

**Areas of Need:**

**Copy of Evaluation Reports to Parents** – During the on-site visit it was determined through record review that parents of students eligible for speech and language services were not consistently provided with copies of evaluation reports 10 days prior to the eligibility meeting.

- **The district will revise its improvement plan to include activities to ensure the district provides copies of evaluation reports 10 days prior to the eligibility meeting. This will ensure that parents have the opportunity to consider the information that will be used in determining eligibility. The plan must include an administrative oversight component to ensure consistent compliant implementation of the plan.**

***Section VIII. IEP***

**Summary of Findings:**

During self-assessment the district accurately identified themselves compliant in the areas of considerations and required statements, present level of education performance, goals and objectives aligned with Core Curriculum Content Standards, age

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of majority, implementation dates, annual review timelines, IEPs to parents, 90-day timelines and teacher access/responsibility.

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

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

**Section IX. Least Restrictive Environment**

**Summary of Findings:**

During the self-assessment process, the district identified concerns in the area of participation of out-of-district students in nonacademic and extracurricular activities. The district identified that there is no procedure for informing families who have children placed in out-of-district placement who may not have other children in the school about participation in nonacademic and extracurricular activities. The district's improvement is sufficient to address this area of need.

Additional areas of need were identified during the on-site visit regarding continuum and individual decision-making.

**Areas of Need:**

**Continuum and Individual Decision Making** – During the on-site visit it was determined through record review and staff interviews that the district has experienced a high rate of transfer students into the district. The majority of these students are already placed in out- of-district programs. Because the district has not developed programs to address the educational and behavioral needs of these students, other options cannot be considered by the members of the IEP team. Additionally, it was determined that because the district has typically placed its students in pull-out resource center programs through the third grade and then changed the program to an in-class model at the fourth grade, any other option for the lower grade students is not given adequate consideration. As such, the use of supports and services in the general education setting is not considered as a first option.

- **The district will revise its improvement plan to include activities to ensure that a continuum of program options is available to meet the changing needs of the district. These activities must include a needs assessment to identify the types of supports and services that are necessary to more effectively address the academic and behavioral needs of the students in the least restrictive environment. Implementation of these activities will ensure that general education settings with appropriate supports and services are considered as the first option and that the decision-making process that led to the removal from the general education setting is clearly documented. The improvement plan must include staff development and an administrative oversight component to ensure the consistent implementation of these activities.**

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**Section X. Transition to Preschool**

**Summary of Findings:**

During the self-assessment the district accurately identified themselves compliant in the areas of preschool transition planning conferences and placement into preschool disabled programs by age 3.

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

**Section X. Transition to Post School**

**Summary of Findings**

During the self-assessment process, the district identified areas of need regarding age 14 transition service needs, students' interests and preferences, courses of study, and annual goals and benchmarks related to the student's desired outcomes. The district's improvement plan is sufficient to address these areas of needs.

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

**Section XI. Discipline**

**Summary of Findings:**

During self-assessment the district accurately identified themselves compliant in the areas of procedural safeguards, documentation to case managers, suspension tracking and interim alternative educational settings.

Areas of need were identified during on-site visit regarding functional behavioral assessments/behavioral intervention plans and manifestation determination meetings.

**Areas of Need:**

**Functional Behavioral Assessments and Behavioral Intervention Plans** – During the on-site visit it was determined through record review and staff interviews that the child study team is not conducting functional behavioral assessments and behavioral intervention plans for those students who require plans to address their behavioral needs.

- **The district will revise its improvement plan to include activities to ensure the identification of students who require a behavior intervention plan as well as the timely evaluation of those needs and the timely development and implementation of the plan. Implementation of these activities will ensure students are afforded the opportunity to have their behavioral needs met and to improve their ability to decrease the number of disciplinary actions. The improvement plan must include an administrative oversight component to ensure the consistent implementation of these activities.**

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**Manifestation Determination Meetings** – During the on-site visit it was determined through record review and staff interviews that the child study team does not conduct manifestation determination meetings when there is a change in placement resulting from disciplinary actions.

- **The district will revise its improvement plan to include activities to ensure that manifestation determination meetings are conducted prior to the 11<sup>th</sup> day of removal. This will ensure that appropriate decisions are made regarding student placement options and the provision of services during the period of time the student is removed. The improvement plan must include an administrative oversight component to ensure the consistent implementation of these activities.**



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**SUMMARY**

An on-site special education monitoring was conducted in the Clementon School District on April 27 & 28, 2004. The purpose of the monitoring was to verify the district's report of findings resulting from self-assessment and to review the district's improvement plan. The district is commended for the comprehensive review conducted during the self-assessment process. As a result of that review the district was able to identify areas of need and develop an improvement plan that with some revision will bring about systemic change. The district is further commended for the many areas determined by the district and verified by the Office of Special Education Programs as compliant with federal and state statutes and regulations.

A review of district data indicated a significant number of students are placed in out-of-district settings. On-site verification identified lack of continuum of in-district program options to meet the needs of these students.

A focus group meeting was held prior to the monitoring visit and although only two parents attended, they expressed their satisfaction with many of the district's programs and services. They were very pleased with the accessibility of the child study team, general education teacher's knowledge of the IEP, general education and special education teacher accessibility and their child's access to general education.

Standards identified as consistently compliant by the district during self-assessment and verified during the on-site monitoring visit included Reevaluation, Statewide Assessments, Graduation Requirements, Programs and Services and Student Records.

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, provision of programs, length of school day and year, transfer students, facilities, certifications, consent, notice in native language, interpreters at meetings and independent evaluations, referral process, pre-referral interventions, direct referral, identification meeting timelines, participants, multi-disciplinary evaluations, standardized assessments, functional assessments, written reports, bilingual evaluations, meeting participants, criteria, statement of eligibility, signatures of agreement disagreement rationale, consideration required statements, present level of education performance, goals and objectives aligned with core curricular content standards, age of majority, implementation dates, annual review timelines, IEPs to parents, 90-day timelines, teacher access/ responsibility, preschool transition planning conferences, early intervention to preschool disabled by age 3, procedural safeguards, documentation to case managers, suspension tracking, and interim alternative education settings.

During the self-assessment process, the district identified areas of need regarding provision of speech and language services, surrogate parents, child find, health summary, vision and hearing screenings, participants, participation of out-of-district students in nonacademic and extracurricular activities, age 14 transition service needs, students interests and preferences, and annual goals and benchmarks related to the student's desired outcomes.

The on-site visit identified additional areas of need within the various standards regarding extended school year, frequency, location, duration and description of

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programs, notice of a meeting, written notice, accept and rejection of outside reports, copy of evaluation reports to parents 10 days prior to the eligibility meeting, continuum, individual decision-making, functional behavioral assessments, behavioral intervention plans and manifestation determination meetings.

Within forty-five days (45) days of receipt of the monitoring report, the Clementon Borough School District will revise the improvement plan to the Office of Special Education Programs to address those areas that require revisions.