

New Jersey Department of Education Special Education Monitoring

District: Cumberland County Technical Education Center **County:** Cumberland

Monitoring Dates: November 25, 2003

Monitoring Team: Caryl Carthew and Patricia Fair

Background Information:

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

- The provision of a free, appropriate public education (FAPE) for students with disabilities in the least restrictive environment;
- The protection of procedural safeguards for students and their families;
- The development and implementation of policies and procedures resulting in procedural compliance; and,
- The organization and delivery of programs and services resulting in positive student outcomes.

The self-assessment was designed to identify areas of strength, promising practices, areas that need improvement and areas that may be noncompliant with state and federal requirements. The Cumberland County Vocational School developed an improvement plan to address identified areas of need.

The Office of Special Education Programs (OSEP) conducted an on-site monitoring to verify the self-assessment findings, to assess the appropriateness of the improvement plan, and to determine the progress in implementing the plan.

As the first step in the on-site monitoring process, the New Jersey Department of Education (NJDOE) held a focus group meeting for parents and community members at the Cumberland County Vocational School on October 22, 2003. Information obtained from that meeting was used to direct the focus of the monitoring visit. One parent was in attendance at the meeting and expressed satisfaction with the varied programs and services offered to the full-time students.

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

District Strengths:

The district is commended for the commitment by administration and staff to provide a comprehensive school experience for students enrolled in the Students Training in

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Vocational Education (STRIVE) program. This program combines academic, social and family living skills with pre-vocational training, including off-site, on-the-job training. In addition to receiving academic instruction and related services, students in the STRIVE program have the opportunity, based on reaching appropriate goals, to work in varied real-life work experiences. In addition to providing these job-related experiences, the students have the opportunity to attend activities outside the school, including trips to New York City and Philadelphia, that serve to improve socialization skills. The district also supports student participation in Special Olympics. For one student who was competing in the games, the school constructed an on-site bocce ball court to allow the student to practice and prepare for the competition. It is evident that staff at the school are willing to commit time and resources well beyond the school day to benefit the students in the STRIVE program.

The district provides a community-based extended school year program for students enrolled in the STRIVE program. Each year's program is coordinated around a single theme and includes a number of community-based experiences. Some of these work sites include local community agencies, banks, post offices, and local businesses. In addition, the program includes educational and related services.

The district also allows students in the STRIVE program to participate in the Globe Program. This is a worldwide hands-on school-based education and science program. Students have the opportunity to learn by taking measurements in the fields of atmosphere, hydrology, soils, and land cover. This data is reported via the Internet and can be used to collaborate with other students, teachers, and scientists around the world.

Part One Data Summary:

The data submitted by the Cumberland County Technical Education Center as a result of the self-assessment process indicated that 100% of the 36 full-time classified students are placed in a self-contained setting. Although shared-time students have more opportunities to participate in regular education vocational programs, the full-time students are self-contained for all subjects. This was identified as an area of concern during self-assessment and has been addressed in the district's improvement plan.

Areas Demonstrating Compliance With All Standards:

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

Section I: General Provisions

Summary of Findings:

During the self-assessment process, the district identified concerns in the area of professional and parent development. The district's improvement plan is sufficient to address these issues. The district further identified concerns in the areas of policies and procedures and dissemination of IDEA information. **The district's improvement plan is insufficient to address these areas because it does not include timelines for completion, person(s) responsible for implementation, documentation of**

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compliance, or oversight activities to ensure implementation of procedures. The plan needs to be revised to include these components.

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

Section II: Free, Appropriate Public Education (FAPE)

Summary of Findings:

During self-assessment the district accurately identified themselves compliant in the areas of extended school year, adaptive PE, length of school day/year, oversight of IEP implementation, and facilities.

During the self-assessment process, the district identified concerns in the areas of procedures for maintaining hearing aids, certification, and procedures for processing transfers. The district's improvement plan is sufficient to address these issues.

An additional area of need was identified during the on-site visit regarding IEP documentation of frequency, location, and duration of related services.

Area(s) of Need:

Frequency, Location, and Duration of Related Services - During the on-site monitoring it was determined that the district's IEP format does not include information on the location of related services. Although the speech therapist attaches a separate report to the IEP which includes this information, the other related services (counseling, occupational therapy, and physical therapy) do not identify whether services will be provided in an in-class or pull-out setting. In addition, the frequency and duration of counseling services is not consistently identified.

- **The district will revise the improvement plan to include activities to ensure the child study team members identify frequency, location, and duration for all related services. The implementation of these activities will ensure parents are fully informed of the amount of time the student will be removed from the educational program. The improvement plan must include an administrative oversight component to ensure the consistent implementation of the plan.**

Section III: Procedural Safeguards

Summary of Findings:

During self-assessment the district accurately identified themselves compliant in the areas of consent, surrogate parents, notice of a meeting, written notice, notice timelines, meetings, and independent evaluations.

During the self-assessment process, the district identified concerns in the area of documentation of attempts to secure parent participation at meetings. On-site monitoring activities determined that the district has implemented activities to bring about correction

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in this area. The district further identified concerns regarding native language. **The district's improvement plan is insufficient to address this issue because although it was identified as an area of need, no activities were submitted with the plan. The plan needs to be revised to include these activities, as well as an administrative oversight component to ensure consistent implementation of new procedures.**

An additional area of need was identified during the on-site visit regarding content of notice of a meeting.

Area(s) of Need:

Notice of a Meeting – During the on-site monitoring it was determined that the district does not inform the parent of their right to bring someone with special expertise to a meeting when the purpose will or may include review, revision or development of an IEP.

- **The district will revise its notices of a meeting to ensure they include all required components. It is recommended that the district adopt the notices developed by the Office of Special Education Programs. Implementation of these activities will result in parents being fully informed regarding their rights relative to participation in meetings.**

Section IV: Location, Referral and Identification

Summary of Findings:

During self-assessment the district accurately identified themselves compliant in the area of procedures for identifying at-risk students to the district of residence. This district does not have a full-time regular education population; therefore, any referrals for identification of students in the part-time program would be made to the student's district of residence.

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

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 assessments, use of standardized assessments, components of functional assessments, and bilingual evaluations.

During the self-assessment process, the district identified concerns in the area of documentation of acceptance and/or rejection of outside evaluations. The district's improvement plan is sufficient to address this issue.

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

Area(s) of Need:

Evaluation Reports - During the on-site monitoring it was determined that the summaries of learning evaluations include an eligibility statement. As a result, the required participants do not have the opportunity to collaborate on a decision regarding eligibility.

- **The district will immediately cease this practice. The district will revise the improvement plan to include administrative oversight activities to ensure this practice does not continue. Implementation of these activities will ensure all required meeting participants having input regarding eligibility determinations.**

Section VI: Reevaluation

Summary of Finding:

During self-assessment the district accurately identified themselves compliant in the area of conducting planning meetings with required participants.

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

An additional area of need was identified during the on-site visit regarding reevaluation procedures for new applicants.

Area(s) of Need:

Reevaluation Procedures - During on-site monitoring it was determined that current procedures for processing applicants for the STRIVE program include a review of the student's triennial date. If this date has expired or will expire in the first year the student attends the STRIVE program, the district of residence is asked to complete the reevaluation process. As a result, reevaluations are completed by the district of residence even though Cumberland County Technical Education Center serves as the local education agency (LEA) for these full-time students.

- **The district will revise the improvement plan to include activities to ensure reevaluations are conducted by the responsible LEA. The implementation of these activities will result in decisions regarding evaluation and eligibility being made by the agency that has direct responsibility for the provision of programs and services. The improvement plan must include an administrative oversight component to ensure implementation of the plan.**

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Section VII: Eligibility

Summary of Findings:

During self-assessment the district accurately identified themselves compliant in the areas of conducting eligibility meetings with required participants, application of eligibility criteria, and documentation of eligibility.

During the self-assessment process, the district identified concerns in the area of provision of evaluation reports to parents 10 days prior to the eligibility meeting. On-site monitoring activities determined that the district has implemented activities to bring about correction in this area. The district further identified concerns regarding documentation of the agreement and/or disagreement with the classification decision. **The district's improvement plan is insufficient to address this issue because it does not identify administrative oversight activities that will ensure the consistent implementation of new procedures. The plan needs to be revised to include this component.**

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

Section VIII: Individualized Education Program (IEP)

Summary of Findings:

During self-assessment the district accurately identified themselves compliant in the areas of IEP meeting participants, procedures for revising IEPs, age of majority, and teacher knowledge/access to IEPs.

During the self-assessment process, the district identified concerns in the areas of IEP implementation dates and annual review timelines. The district's improvement plan is sufficient to address these issues. The district further identified concerns regarding IEP required components, goals and objectives for related services, and ensuring that IEPs are current prior to providing services. **The district's improvement plan is insufficient to address these areas because it does not identify administrative oversight activities that will ensure the consistent implementation of new procedures. In addition, while the plan regarding current IEPs indicates that data will be requested from the sending districts, it does not identify what steps the district will take to ensure that current IEPs are developed should the data from the sending district not be provided. The plan needs to be revised to include these components.**

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

Section IX: Least Restrictive Environment (LRE)

Summary of Findings:

During self-assessment the district accurately identified themselves compliant in the areas of individualized decision-making, documentation of the Oberti considerations in

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the IEP, provision of supplemental aids and services, and participation in nonacademic and extracurricular activities.

During the self-assessment process, the district identified concerns in the areas of continuum of services and participation of classified students with their non-disabled peers. The district's improvement plan is sufficient to address these issues. On-site monitoring activities determined that the district has begun to implement activities to bring about correction in this area.

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

Section X: Transition to Post-School

Summary of Findings:

During self-assessment the district accurately identified themselves compliant in the areas of agency invitations and involvement in transition planning and including statements of needed transition services in the IEP.

During the self-assessment process, the district identified concerns in the areas of procedures for tracking post-secondary outcomes. The district's improvement plan is sufficient to address this issue. The district further identified concerns regarding student invitations to planning meetings. On-site monitoring activities determined that the district has implemented activities to bring about correction in this area. In addition, the district identified concerns regarding procedures for conducting individual vocational assessments, providing access to the same guidance activities as non-disabled students, and a need for more job training opportunities. **The district's improvement plan is insufficient to address the issue of individual vocational assessments because it lacks activities to ensure that parental consent is obtained prior to conducting those assessments. In addition, the plan is insufficient to address the issues of access to guidance activities and development of job training/job coaching experiences because it does not identify timelines for completion, person(s) responsible for implementation, documentation of compliance, and administrative oversight activities to ensure consistent implementation of procedures. The plan needs to be revised to include these components.**

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

Section XI: Discipline

Summary of Findings:

During self-assessment the district accurately identified themselves compliant in the areas of discipline procedures, notification of removals to case managers, suspension tracking, development of behavior intervention plans, conducting functional behavior assessments, and conducting manifestation determinations.

During the self-assessment process, the district identified concerns in the areas of documentation of consultation on the extent of services provided to students when

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removals for discipline do not constitute a change in placement. On-site monitoring activities determined that the district has implemented activities to bring about correction in this area. The district further identified concerns regarding placement in an interim alternative education setting and procedures for requesting due process when a student represents a danger to himself or others. **The district's improvement plan is insufficient to address these areas because it does not identify administrative oversight activities to ensure that procedures are consistently implemented. The plan needs to be revised to include this component.**

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

Section XIII: Graduation

Summary of Findings:

During self-assessment the district accurately identified themselves compliant in the areas of IEP requirements, diploma, and participation in graduation exercises.

During the self-assessment process, the district identified concerns in the area of written notice of graduation. **The district's improvement plan is insufficient to address this area because it does not identify administrative oversight activities that will ensure the consistent implementation of procedures. The plan needs to be revised to include this component.**

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

Section XIV: Programs and Services

Summary of Findings:

During self-assessment the district accurately identified themselves compliant in the areas of class size, group size for speech therapy, and homebound instruction.

During the self-assessment process, the district identified concerns in the area of age range for self-contained classes. On-site monitoring activities determined that the district has implemented activities to bring about correction in this area. Of the four self-contained classes, one class exceeds the allowed age range by 5 months, but the district has requested a waiver for this situation from the County Office of Education.

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

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Summary

On-site special education monitoring was conducted in the Cumberland County Vocational School on November 25, 2003. The purpose of the monitoring visit was to verify the district's report of findings resulting from their self-assessment and to review the district's improvement plan. The district is commended for the exceptionally comprehensive review conducted during the self-assessment process. As a result of that review the district was able to identify nearly all areas of need and develop an improvement plan that with some revision will bring about systemic change. The district is further commended for the prompt implementation of corrective action to address the areas of need identified during the self-assessment process. As a result, a number of those identified areas were corrected prior to the on-site visit. Additionally, the district is commended for the many areas that were determined by the district and verified by the Office of Special Education Programs as compliant with federal and state statutes and regulations. Further, the district is commended for its commitment to providing a comprehensive program for students enrolled in the STRIVE program, including varied job-training and life-skills experiences.

A review of data indicated an area of concern regarding placement in the least restrictive environment and has addressed this need in the improvement plan.

A focus group meeting was held prior to the monitoring visit. Only one parent was in attendance. This parent expressed her satisfaction with the district's programs and services.

Areas identified as consistently compliant by the district during self-assessment and verified during the on-site monitoring visit included extended school year, provision of related services, length of school day/year, facilities, certification, surrogate parents, consent, prior written notice, independent evaluations, eligibility determination, IEP development, IEP documentation, IEP revisions, age of majority, participation in nonacademic and extracurricular activities, statewide assessments, participation in graduation activities, provision of programs and services, and procedures for maintenance and destruction of pupil records.

During the self-assessment process, the district identified areas of need regarding professional development, parent training, policies and procedures, dissemination of IDEA information, procedures for maintaining hearing aids, transfers, documentation of attempts to secure parent participation at meetings, native language, Child Find, documentation of acceptance and/or rejection of outside evaluations, reevaluation and annual review timelines, provision of evaluation reports to parents, documentation of agreement or disagreement with the eligibility determination, IEP components, implementation dates on IEPs, least restrictive environment and continuum of services, transition planning, services for students who have been suspended and/or expelled, placements in interim alternative education settings, written notice of graduation, and age range for self-contained classes.

The on-site visit identified additional areas of need within the various standards regarding related services, notice of a meeting, written reports, and reevaluation procedures for new applicants.

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