

New Jersey Department of Education Special Education Monitoring

District: Deptford Township School District

County: Gloucester

Monitoring Dates: February 19-22, 2002

Monitoring Team: Patricia Fair, Mary Heade, Jane Marano, Arlene Popovici, and Kenneth Richards

Background Information

During the 2000 – 2001 school year, the Deptford Township School District conducted a self-assessment of special education policies, procedures, programs, services, and student outcomes. This self-assessment component of the monitoring process provided the Deptford Township School District 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 Deptford Township School District developed an improvement plan to address identified areas of need.

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

As the first step in the on-site monitoring process, the NJDOE held a focus group meeting for parents and community members at the Deptford Township High School on February 11, 2002. Information obtained from that meeting was used to direct the focus of the monitoring visit.

During the on-site, 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. The monitoring team conducted on-site observations of the district's special education programs. Interviews were conducted with the district's special education administrator, building principals, general education, and special education teachers, child study team members, and speech therapists. Parents of students with disabilities were interviewed by telephone.

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DISTRICT STRENGTHS:

This year the district initiated a half-day four-year-old program and a full day kindergarten program for all children in the school district. As a result of this initiative, most of the district's preschool children with disabilities are placed in regular education programs.

The district has been providing vocational services and job placement opportunities to students with moderate to severe cognitive disabilities at the New Sharon School for more than twenty-five years. Students from outside of the Deptford Township School District - Camden and Salem counties – also attend this program because of the vocational/life skills activities in the least restrictive environment.

Area Demonstrating Compliance with All Standards:

Discipline was determined to be an area of compliance by the district during self-assessment and by the Office of Special Education Programs during the on-site visit.

SECTION I. GENERAL PROVISIONS

Summary of Findings:

During self-assessment the district accurately identified themselves compliant in the areas of special education policies and procedures and dissemination of public information.

An area of need was identified during the on-site visit regarding professional development.

Area of Need:

Professional Development – During the on-site monitoring, it was determined through interviews that the district does not provide sufficient professional development opportunities to meet the needs of the instructional staff in the area of special education.

- **The district will revise their improvement plan to include procedures to ensure the provision of professional development opportunities in the area of special education. The plan must include a needs assessment and a component to assess the effectiveness of the training.**

SECTION II. FREE APPROPRIATE PUBLIC EDUCATION (FAPE)

Summary of Findings:

During self-assessment the district accurately identified themselves compliant in the areas of related services, length of school day and year, and certifications.

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During the self-assessment process, the district identified concerns regarding extended school year. The district has developed an improvement plan that does not sufficiently address this area of need because it lacks in-service, an administrative oversight component and a reasonable timeline to ensure the consistent, compliant, and timely implementation of the procedures. The plan must be revised to include these elements.

Additional areas of need were identified during the on-site visit regarding transfer students and appropriate facilities for instruction. Facilities issues have been provided to the county office.

Area of Need:

Transfer Students – During the on-site visit, it was determined through staff interviews and record review that when a student with disabilities transfers into the district, the full child study team does not conduct an immediate review of the evaluation materials and IEP.

- **The district will revise its improvement plan to include procedures to ensure that when a student with disabilities transfers into the district the full child study conducts an immediate review of the evaluation materials and IEP to determine the appropriate program for the student. The improvement plan must include in-service and an administrative oversight component to ensure the consistent, compliant implementation of the procedures.**

SECTION III. PROCEDURAL SAFEGUARDS

Summary of Findings:

During self-assessment, the district accurately identified themselves compliant in the areas of provision of consent, meetings, native language, independent evaluations, and the provision of special education rules (N.J.A.C. 6A: 14) and due process hearing rules (N.J.A.C. 1:6A).

During the self-assessment process, the district identified concerns in the areas of surrogate parents, notices of all meetings, written notice, and the provision of the short procedural safeguard statement. The district has developed an improvement plan that does not sufficiently address notices of meetings and written notice because it lacks in-service and an administrative oversight component to ensure the consistent, compliant implementation of the procedures. The district has developed an improvement plan that does not sufficiently address the area of surrogate parents because it lacks in-service and a reasonable timeline to ensure the consistent, timely implementation of the procedures. The improvement plan needs to be revised to include these elements.

An additional area of need was identified during the on-site visit regarding the provision of Parental Rights in Special Education (PRISE).

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Areas of Need:

Provision of PRISE - During the on-site visit, it was determined through interviews with staff and parents and record review that PRISE is not provided with notice of a meeting. Instead, PRISE is given with prior written notice.

- **The district will revise its improvement plan to include procedures to ensure the provision of PRISE with notice of a meeting. The improvement plan must include an administrative oversight component to ensure the implementation of the procedure.**

SECTION IV. LOCATION, REFERRAL, IDENTIFICATION

Summary of Findings:

During self-assessment the district accurately identified themselves compliant in the areas of referral process, direct referrals from parents and staff, summer referrals, health summary, vision/hearing screenings, and identification meetings (participants and timelines) for students ages 5-21.

During the self-assessment process, the district identified concerns in the area of child find activities. The district has developed an improvement plan that does not sufficiently address this issue because it lacks a procedure, an administrative oversight component, and a reasonable timeline to ensure the consistent, compliant and timely implementation of the procedures. The plan needs to be revised to include these elements. Additionally, the district has participated in technical assistance sessions regarding the issue of an overrepresentation of minority students in special education. Staff from the Office for Civil Rights and the Office of Special Education Programs will determine the appropriateness of that plan and advise the district of any additional requirements.

An additional area of need was identified during the on-site monitoring regarding identification meetings for preschool students.

Area of Need:

Preschool Identification Meetings – During the on-site monitoring it was determined that identification meetings are not consistently held for students age 3-5. Additionally, when meetings are conducted, regular education teacher do not consistently participate.

- **The district will revise its improvement plan to include procedures to ensure the district convenes an identification meeting that includes a regular education teacher for preschool aged students who are referred for evaluation. The improvement plan must include an administrative oversight component to ensure the implementation of the procedure.**

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SECTION V. EVALUATION

Summary of Findings:

During self-assessment the district accurately identified themselves compliant in the areas of multi-disciplinary evaluations, standardized assessments, bilingual evaluations, functional assessments for students eligible for special education, and written reports for students eligible for special education and related services.

During the self-assessment process, the district identified concerns in the areas of functional assessments and written reports for students eligible for speech/language services and documentation of acceptance and rejection of reports for transfer students. The district has developed an improvement plan that does not sufficiently address functional assessments because it lacks procedures and an administrative oversight component to bring about required changes. The district has developed an improvement plan that does not sufficiently address written reports and documentation of acceptance and rejection of reports because it lacks in-service and an administrative oversight component to ensure the consistent, compliant implementation of the procedures. The improvement plan needs to be revised to include these components.

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

SECTION VI. REEVALUATION

Summary of Findings:

During self-assessment the district accurately identified themselves compliant in the areas of planning meetings, participants at planning meetings, and conducting reevaluations by June 30th of a student's last year in a program for preschool students with disabilities.

During the self-assessment process, the district identified concerns in the area of the three-year timelines. The district has developed an improvement plan that does not sufficiently address this area of need because it lacks in-service and an administrative oversight component to ensure the consistent, compliant implementation of the procedures. The plan needs to be revised to include these components.

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

Reevaluation – During the on-site visit, it was determined through interviews and record review, that at the annual review meeting for those students who will require a reevaluation by the following school year, the district conducts a reevaluation planning meeting, reviews data, and, if necessary, obtains consent to conduct assessments. However, that evaluation is not implemented until the following school year. Because there is a significant gap between the review of data and the date of implementation of the decisions made as a result of that review, the data are no longer current. As such, the decisions made at the time of the review may no longer be valid.

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- **The district will revise its improvement plan to include procedures to ensure that at the reevaluation planning meeting, the district conducts a review of existing data and makes decisions based on that data that are implemented without undue delay. The improvement plan must include in-service and an administrative oversight component to ensure the consistent, compliant implementation of the procedures.**

SECTION VII. ELIGIBILITY

Summary of Findings:

During self-assessment the district accurately identified themselves compliant in the area of eligibility meetings (including participants), documentation of eligibility, and provision of evaluation reports to parents.

During the self-assessment process, the district identified concerns regarding criteria (for communication impaired and specific learning disability). The district has developed an improvement plan that does not sufficiently address this issue because it lacks procedures, in-service and an administrative oversight component to bring about the required changes. The improvement plan needs to be revised to include these components.

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 area of implementation, timelines (annual review and 90-day), provision of opportunity to observe proposed placement, and teachers having knowledge of and access to the IEPs.

During the self-assessment process, the district identified concerns regarding participants at IEP meetings, documentation of considerations, required statements and IEP components, age of majority, and IEP team meeting prior to making changes in students' programs and services. The district has developed an improvement plan that sufficiently addresses annual reviews. The district has submitted an improvement plan that is insufficient to address the other areas because it lacks procedures, in-service and administrative oversight to bring about the required changes. The improvement plan needs to be revised to include these components.

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

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SECTION VIII. LEAST RESTRICTIVE ENVIRONMENT

Summary of Findings:

During self-assessment the district accurately identified themselves compliant in the areas of individualized decision-making, regular education access, and continuum of placement options.

During the self-assessment process, the district identified concerns in the areas of participation in nonacademic and extracurricular activities, and instruction in the core curriculum content standards regardless of placement. The district did not develop an improvement plan for these issues. The improvement plan must be revised to include procedures, in-service and an administrative oversight component to bring about the required changes.

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 identified concerns regarding student and agency invitations, student attendance at IEP meetings, provision and monitoring of transition services by outside agencies, agency participation at IEP meetings, statement of transition service needs, statement of needed transition services, interests/preferences and courses of study. The district has developed an improvement plan that does not sufficiently address these issues because it lacks procedures, in-service, an administrative oversight component, and a reasonable timeline to bring about the required changes in a timely manner. The plan needs to be revised to include these elements.

Additional areas of need were identified during the on-site visit regarding transition service needs, post secondary liaison and agency participation.

Areas of Need:

Transition Service Needs - During the on-site visit, it was determined through record review that transition service needs are not identified in IEPs of students who will turn fourteen prior to the end date of the existing IEP.

- **The district will revise its improvement plan to include procedures to ensure transition service needs are documented in IEPs for those students who will turn fourteen prior to the end date of the existing IEP. The plan must include an administrative oversight component to ensure the implementation of the procedures.**

Post Secondary Liaison - During the on-site visit, it was determined through record review that the liaison to post secondary resources is not consistently identified and documented in the IEP.

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- **The district will revise its improvement plan to include procedures to ensure IEPs document the post-secondary liaison. The plan must include an administrative oversight component to ensure the implementation of the procedures.**

Agency Participation – During the on-site visit a review of records indicated that when agencies are invited to send a representative to meetings and these representatives do not attend, the district does not consistently document the steps it has taken to obtain their participation in the planning of transition services.

- **The district will revise its improvement plan to include procedures to ensure the district documents the multiple attempts it makes to obtain agency participation at meetings where transition planning will occur. The plan must include an administrative oversight component to ensure implementation of the procedures.**

TRANSITION TO PRESCHOOL

Summary of Findings:

During self-assessment, the district determined themselves compliant in all areas of transition from EIP to preschool.

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

SECTION XII: STATEWIDE ASSESSMENT

Summary of Findings:

During self-assessment the district accurately identified themselves compliant in the areas of participation, provision of approved accommodations/modifications, IEP documentation, and provision of alternative assessments.

During the self-assessment process, the district identified concerns in the area of participation in the Special Review Assessment. The district has developed an improvement plan that does not sufficiently address this area because it lacks in-service, an administrative oversight component, and a reasonable timeline to ensure the consistent, compliant, timely implementation of the procedures. The improvement plan needs to be revised to include these components.

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

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SECTION XIII: GRADUATION

Summary of Findings:

During self-assessment the district accurately identified themselves compliant in the areas of graduation requirements in IEPs, provision of high school diploma, and participation in graduation activities.

An area of need was identified during the on-site visit regarding the provision of written notice.

Areas of Need:

Written Notice of Change in Placement for Graduation - During the on-site visit, record review and interviews with staff determined that adult students and parents do not receive written notice informing them that graduation with a state endorsed diploma is a change in placement.

- **The district will revise its improvement plan to include procedures to ensure the district provides written notice of graduation to parents and adult students. The plan must include an administrative oversight component to ensure the consistent implementation of the procedures.**

SECTION XIV. PROGRAMS AND SERVICES

Summary of Findings:

During self-assessment the district accurately identified themselves compliant in the areas of age range, group size for speech, home instruction, related service schedules, and consultation time for resource teachers.

During the self-assessment process, the district identified concerns in the areas of group size for resource programs, class size for autism program, supplementary instruction, description for special education classes, and a description for team teaching. The district's improvement plan sufficiently addresses the development of descriptions of special education classes and the team teaching model. The district's improvement plan does not sufficiently address group size for resource programs and the autistic program because it lacks procedures, an administrative oversight component and a reasonable timeline to bring about the required changes in a timely manner. The improvement plan needs to be revised to include these components.

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

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SECTION XV. STUDENT RECORDS

Summary of Findings:

During self-assessment the district accurately identified themselves compliant in the areas of parent/adult student access to records and procedures for maintenance and destruction of pupil records.

Areas of need were identified during the on-site visit regarding documentation of access to student records and documentation of locations of records.

Areas of Need:

Documentation of Access - During the on-site visit it was determined that speech files do not have access sheets.

- **The district will revise its improvement plan to include procedures to ensure speech files contain access sheets. The plan must include an administrative oversight component to ensure the implementation of the procedures.**

Documentation of Location of Student Records – During the on-site monitoring it was determined that central files do not document the location of other files maintained by the district.

- **The district will revise its improvement plan to include procedures to ensure central files identify the location of other records maintained by the district.**

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Summary

On-site special education monitoring was conducted in the Deptford Township School District on February 19 - 22, 2002. 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 this review the district was able to identify nearly all areas of need and develop an improvement plan that with some revision, will be sufficient to bring about systemic change. The district is further commended for the 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.

At a focus group meeting held prior to the monitoring visit, parents expressed positive comments about the district's preschool special education services, such as use of a daily communication book, the smooth transition from early intervention programs, and implementation of preschool services by the child's third birthday. Many of the concerns raised by the parents during the focus group meeting had already been identified by the district during the self-assessment process. These issues included the lack of participation by students who are placed in out-of-district programs in nonacademic and extracurricular activities in the district, the lack of participation of students age 14 and above in their transition IEP meeting, and the lack of discussion regarding the need for extended school year services.

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 public IDEA information, provision of related services, length of school day and year, certifications, provision of consent, meetings, native language, independent evaluations, provision of special education rules and due process rules, referral process, direct referral from parents and staff, summer referrals, health summary, vision and hearing screenings, identification meetings (participants and timelines) for students ages 5-21, multi-disciplinary evaluations, standardized assessments, provision of bilingual evaluations, functional assessment for students eligible for special education and related services, written reports for students eligible for special education and related services, reevaluations planning meeting/participants, conducting reevaluation by June 30th of last year in preschool special education program, documentation of eligibility, provision of evaluation reports, IEP implementation, timelines (annual review & 90 days), provision of opportunity to observe proposed placement, teachers having knowledge/access to the IEP, individualized decision making, regular education access, continuum of placement options, preschool transition, discipline, participation in statewide assessment, provision of approved accommodations/modifications, IEP documentation, provision of alternative assessments, graduation requirements in students' IEPs, provision of high school diploma, participation in graduation activities, age range, group size for speech, home instruction, related services schedules, consultation time for resource teachers, access to student records, and procedures for the maintenance/ destruction of student records.

During the self-assessment process, the district identified areas of need regarding, extended school year, surrogate parents, notices of meetings, written notices, provision of the short procedural safeguard statement, child find, functional assessments for

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students eligible for speech/language services, written reports for students eligible for speech/language services, documentation of acceptance/rejection of reports, reevaluation timelines, criteria for communication impaired and specific learning disability, participants at IEP meetings, documentation of considerations, required statements, IEP components, age of majority, IEP meeting prior to changes, participation in nonacademic/extracurricular activities, instruction in the core curriculum content standards, transition to post-school, participation in SRA, group size for resource programs, class size for autism class, supplementary instruction, description of special education classes, and description of team teaching.

The on-site visit identified additional areas of need within the various standards regarding professional development, transfer students, provision of PRISE, reevaluation planning meetings, preschool identification meetings, transition service needs, post secondary liaison, agency participation, written notice of change in placement for graduation, documentation of access, and documentation of location of student records.

Within forty-five days of receipt of the monitoring report, the district will revise and resubmit the improvement plan to the Office of Special Education Programs to address the areas of need identified during the on-site visit and those areas that require revisions to the improvement plan.