

New Jersey Department of Education Special Education Monitoring

District: Ewing Township School District

County: Mercer

Monitoring Dates: January 23-24, 2002

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Background Information:

During the 2000-2001 school year, the Ewing Township School District conducted a self-assessment of policies, procedures, programs, services, and student outcomes. This self-assessment component of the monitoring process provided the Ewing 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 Ewing 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 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 on January 8, 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. Interviews were conducted with the district's special education administrators, building principals, speech therapists, general education and special education teachers, and child study team members.

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District Strengths:

The district is commended for providing the following unique programs for special education students:

C.A.R.E. - The CARE program is available to assist special education students with their social and emotional development. The program provides crisis intervention and a setting where students can discuss school problems. The program proactively addresses disruptive behavior by providing students with personal focuses on behavior management strategies.

Student Success Program - This program provides at least one advocate who monitors and provides intervention services to students who have been declassified. Students in this program may also attend the after-school tutoring program to address any academic needs that may arise.

Alternative Learning Program (ALP) – This program provides an alternative for special education students who have difficulty attending the high school during the hours of the regular school day. This program affords these students with the opportunity to stay in school, receive both individual and group counseling services, as well as receive other mandated related services. The program is provided at the high school between the hours of 2:30 PM and 6:30 PM.

Inclusion Facilitator - The inclusion facilitator assists the district in developing and implementing special education and regular education programs that promote inclusion. These activities are accomplished through staff development, training strategies, and specialized instructional techniques. The inclusion facilitator also assists building principals in developing schedules to promote collaboration between special and regular education staff.

Areas demonstrating Compliance with All Standards:

Eligibility was determined to be an area of compliance by the district during self-assessment and verified 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 Policy and Procedures and dissemination of IDEA information to parents. The required Statement of Assurances and procedures have been submitted to the county office.

During the self-assessment process, the district identified the need to provide training to address the needs of parents of students with disabilities and training for all staff regarding inclusion, behavioral support/interventions, transition practices, modification and accommodation techniques, and the Core Curriculum Content Standards. The

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district has developed an improvement plan that is sufficient to address these areas of need. The district further identified the need to have a variety of educational programs and services available to students with disabilities. The district has developed an improvement plan that does not sufficiently address this area of need because it lacks procedures, in-service and an administrative oversight component to bring about the required changes. The district will revise the improvement plan to include these elements.

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

Section II: F.A.P.E.

Summary of Findings:

During self-assessment the district accurately identified themselves compliant in the areas of certification.

During the self-assessment process, the district identified concerns regarding the need to provide in-service training to assist speech/language therapists develop grades and short-term objectives or benchmarks that address all identified student needs. The district has developed an improvement plan that is sufficient to address this area of need. The district further identified concerns regarding the need to consistently provide related services. The district has developed an improvement plan that does not sufficiently address this area of need because it lacks procedures, in-service and an administrative oversight component to bring about the required changes. The district will revise the improvement plan to include these elements.

During the on-site visit additional areas of need were identified regarding goals and objectives for related services, documentation of length of school day, extended school year, transfer students, and facilities issues. The county office has been provided with information related to these facilities issues.

Areas of Need:

Goals and Objectives for Related Services - During the on-site monitoring it was determined that the district does not develop goals and objectives for all related services.

- **The district will revise the improvement plan to include procedures to ensure that goals and objectives are developed for all related services and incorporated into IEPs. The improvement plan must include an administrative oversight component to ensure the implementation of the procedures.**

Documentation of Length of School Day - During the on-site monitoring it was determined through record review and staff interviews that the district does not document the length of the school day for those students who have a shorten day.

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- **The district will revise the improvement plan to include procedures to ensure the district identifies the length of the school day for those students who have a shorten day. The improvement plan must include an administrative oversight component to ensure the implementation of the procedures.**

Extended School Year - During the on-site monitoring it was determined that although extended school year is considered/discussed at each IEP meeting, that discussion is not documented in each students' IEP.

- **The district will revise the improvement plan to include procedures to ensure the district documents the discussions related to the provision of ESY services in the IEP. The improvement plan must include an administrative oversight component to ensure the implementation of the procedures.**

Transfer Procedures - During the on-site monitoring it was determined that when students with disabilities transfer into the district and records are not immediately forwarded by the former district, school personnel place these students in regular education programs until records are received.

- **The district will revise the improvement plan to include procedures to ensure that when a student transfers into the district and records are not immediately available, the district obtains information necessary to make decisions regarding an appropriate placement for the student. The improvement plan must include an administrative oversight component to ensure the consistent implementation of this procedure.**

Section III: Procedural Safeguards

Summary of Findings:

During self-assessment the district accurately identified themselves compliant in the areas of surrogate parents, consent, independent evaluations, and 15-day timelines.

During the self-assessment process, the district identified concerns regarding notices of a meeting and written notice. The district has developed an improvement plan that is sufficient to address these areas of need. The district further identified concerns regarding translation resources for non-English speaking parents. The district has developed an improvement plan that does not sufficiently address this area of need because it lacks procedures, in-service and an administrative oversight component to bring about the required changes. The district will revise the improvement plan to include these elements.

Additional areas of need were identified during the on-site visit regarding 20-day timelines, native language and interpreters.

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Areas of Need:

20-Day Timeline - During the on-site monitoring it was determined that although the district conducts identification meetings for students eligible for special education and related services, these meetings are not conducted within the 20-day timeline and do not include the required participants.

- **The district will revise the improvement plan to include procedures to ensure that identification meetings are convened within 20 days of receipt of a written referral and include the required participants. The improvement plan must also include in-service and an administrative oversight component to ensure the consistent, compliant implementation of these procedures.**

Native Language - During the on-site monitoring it was determined that although the district provides notice of meetings to parents, the district does not provide these notices in any language other than English, even when feasible.

- **The district will revise the improvement plan to include procedures to ensure notices are provided in the parent's native language, when feasible.**

Interpreters - During the on-site monitoring it was determined that although interpreters attend meetings, their attendance is not documented.

- **The district will revise the improvement plan to include procedures to ensure that the attendance of interpreters at meetings is documented in student files.**

Section IV: Location, Referral, and Identification

Summary of Findings:

During self-assessment the district accurately identified themselves compliant in the areas of health summary, vision and hearing screenings and summer referrals.

During the self-assessment process, the district identified concerns regarding the need to identify and reduce inappropriate disparities among racial-ethnic groups in classification and placement. The district has developed an improvement plan regarding staff development, classification and placement issues related to this concern that will be reviewed for appropriateness by staff members from the Office for Civil Rights and the Office of Special Education Programs. At that time, any needed revision to the plan will be addressed.

Additional areas of need were identified during the on-site monitoring visit regarding pre-referral interventions and child find.

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Areas of Need:

Pre-Referral Interventions - During the on-site monitoring it was determined that the district does not maintain documentation of pre-referral interventions or the implementation and effectiveness of these interventions and alternative instructional strategies.

- **The district will revise the improvement plan to include procedures to ensure that it maintains documentation of sufficient interventions, their implementation and effectiveness. The improvement plan must include in-service and an administrative oversight component to ensure the consistent, compliant implementation of these procedures.**

Child Find - During the on-site monitoring it was determined that although the district has a cable channel, web site and community newspaper to implement its child find activities, these activities do not include migrant or homeless children. Additionally, it was determined that the district's child find information is not provided in any language other than English.

- **The district will revise the improvement plan to include procedures to ensure that child find activities are conducted to locate, refer and identify potentially disabled students ages 3-21, including migrant and homeless students. The plan must further ensure these activities are conducted in languages other than English. The plan must include an administrative oversight component to ensure implementation of these procedures.**

Section V: Evaluation

Summary of Findings:

During self-assessment the district accurately identified themselves compliant in the areas of consent for evaluations.

During the self-assessment process, the district identified concerns regarding development of a discrepancy model to determine whether a severe discrepancy exists between achievement and ability. The district has developed an improvement plan that does not sufficiently address this area of need because it lacks procedures, in-service and an administrative oversight component to bring about the required changes. The district will revise the improvement plan to include these elements.

Additional areas of need were identified during the on-site monitoring visit regarding functional assessments, multi-disciplinary evaluations for speech, assessments/reports, native language assessments and acceptance/rejection of reports.

Areas of Need:

Functional Assessments - During the on-site monitoring it was determined that functional assessments do not contain the required components.

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- The district will revise the improvement plan to include procedures to ensure that functional assessments contain all components as required by N.J.A.C. 6A:14-3.4(d)2. The improvement plan must include an administrative oversight component to ensure the implementation of the procedures.

Speech Report Components - During the on-site monitoring it was determined that a written statement from the student's teacher of the educational impact created by the speech problem is not included in the report.

- The district will revise the improvement plan to include procedures to ensure that speech reports include a written educational impact statement. The improvement plan must include an administrative oversight component to ensure implementation of the procedures.

Assessments/Reports - During the on-site monitoring it was determined that written reports are not dated.

- The district will revise the improvement plan to include procedures to ensure that child study team members date their reports.

Native Language Assessments - During the on-site monitoring visit it was determined that the district does not conduct assessments in the student's native language, even when feasible.

- The district will revise the improvement plan to include procedures to ensure that students are assessed in their native language when it is feasible. The improvement plan must include an administrative oversight component to ensure implementation of the procedures.

Acceptance/Rejection of Reports - During the on-site monitoring it was determined that the district does not have procedures to reject reports or accept parts of reports. Their procedures only address how they will accept a report in its entirety.

- The district will revise the improvement plan to include procedures to ensure it documents the acceptance/rejection of an entire report/assessment or any part of the report or assessment which may be provided for consideration by outside specialist, agencies or other districts. The plan must include an administrative oversight component to ensure full implementation of these procedures.

Section VI: Reevaluation

Summary of Findings:

During self-assessment the district accurately identified themselves compliant in the areas of parental consent and reevaluations completed by age five.

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During the self-assessment process, the district identified concerns regarding reevaluation timelines. The district has developed an improvement plan does not sufficiently address this area of need because it lacks procedures, in-service and an administrative oversight component to bring about the required changes. The district will revise the improvement plan to include these elements.

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

Section VIII: IEP

Summary of Findings:

During self-assessment the district accurately identified themselves compliant in the areas of implementation dates and teacher access.

During the self-assessment process, the district identified concerns regarding meeting participants, goals/objectives aligned to the Core Curriculum Content Standards, reporting of progress towards annual goals, and benchmarks/short-term objectives. The district has developed an improvement plan that does not sufficiently address these areas of need because it lacks procedures and an administrative oversight component to bring about the required changes. The district will revise the improvement plan to include these elements. The district further identified a concern regarding issues related to scheduling conflicts, block scheduling, and the ability to implement IEPs. The district has developed an improvement plan that is sufficient to address this area of need.

Additional areas of need were identified during the on-site monitoring visit regarding considerations and required statements, age of majority, annual review timeliness, 90-day time-lines, documentation of IEP/evaluations to parents, Present Levels of Educational Performance, changes in programs and teacher responsibility in implementing IEPs.

Areas of Need:

Considerations and Required Statements - During the on-site monitoring it was determined that IEPs do not contain all the required components and statements.

- **The district will revise the improvement plan to include procedures to ensure that IEPs contain all the required statements and components. It is recommended that district use the IEP format developed by the New Jersey Department of Education, Office of Special Education Programs.**

Age of Majority - During the on-site monitoring it was determined through record review that the district inconsistently notifies parents at least three years before the student reaches age 18, of the transfer of rights at the time the student attains the age of majority.

- **The district will revise the improvement plan to include procedures to ensure that parents are informed at least three years prior to the student attaining the age of majority of the transfer of rights.**

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Annual Review Timeline - During the on-site monitoring it was determined that the district does not conduct annual reviews in a timely manner.

- **The district will revise the improvement plan to include procedures to ensure that annual reviews are completed within required timelines. The improvement plan must include an administrative oversight component to ensure the implementation of the procedures.**

90-day Timeline - During the on-site monitoring it was determined through staff interviews, record review and review of the district's logs of initial evaluations that the district does not consistently meet 90-day timelines.

- **The district will revise the improvement plan to include procedures to ensure that within 90-days of receipt of parental consent for an initial evaluation, determination of eligibility for services and if eligible, development and implementation of an IEP is completed. The improvement plan must include an administrative oversight component to ensure the implementation of the procedures.**

Documentation of IEPs/Evaluation Reports to Parents - During the on-site monitoring it was determined through interviews with staff and record review that although the district provides copies of IEPs and evaluation reports to parents/adult students, the district does not document this provision.

- **The district will revise the improvement plan to include procedures to ensure the district maintains documentation of the provision of IEPs and evaluation reports to parents/adult students. The plan must include an administrative oversight component to ensure implementation of these procedures.**

Present Levels of Educational Performance (PLEP) - During the on-site monitoring it was determined through reviews of IEPs that PLEP statements did not contain required components.

- **The district will revise the improvement plan to include procedures to ensure that PLEP statements contain required components. These statements must be revised to include current and relevant information regarding how the student's disability affects the student's involvement and progress in the general education curriculum. It is recommended the district adopt the model IEP developed by the Department of Education, Office of Special Education Programs. The improvement plan must include in-service and an administrative oversight component to ensure the implementation of the procedures.**

Changes to Students' Programs - During the on-site monitoring it was determined through review of IEPs and interviews with parents that the district does not consistently conduct IEP meetings when changes need to be made to a student's program and/or services.

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- **The district will revise the improvement plan to include procedures to ensure that when changes are proposed to a student's program and/or services, the IEP team reconvenes a meeting with the required participants and provides appropriate written notice of the proposed actions. The plan must include in-service and an administrative oversight component to ensure consistent, compliant implementation of these procedures.**

Regular Education Teachers' Responsibility in Implementing IEPs - During the on-site monitoring it was determined through interviews with staff that although regular education teachers have access to students' IEPs, they are not informed of their role/responsibility in implementing these IEPs. As a result, accommodations and/or modifications are not appropriately implemented in the regular education classroom.

- **The district will revise the improvement plan to include procedures to ensure that regular education teachers are informed of their role and responsibility in implementing IEPs to further ensure the full implementation of those parts of the IEP that are the responsibility of general education instructional staff.**

Section IX: Least Restrictive Environment

Summary of Findings:

During the self-assessment process, the district identified concerns regarding the need to provide appropriate supplemental aids and services to students with disabilities who are three to twelve years of age in the regular education setting. The district has developed an improvement plan that is sufficient to address this area of need.

Additional areas of need were identified during the on-site monitoring visit regarding individualized decision-making, considerations and required statements, notification to out-of-district students and access to regular education.

Areas of Need:

Least Restrictive Environment Statements (LRE) - During the on-site monitoring it was determined that LRE statements are not individualized and do not document the individual considerations that lead to the removal of students from regular education.

- **The district will revise the improvement plan to include procedures to ensure that LRE statements include the necessary information to document the process and considerations that result in a student's removal from regular education. The improvement plan must also include in-service and an administrative oversight component to ensure the consistent, compliant implementation of the procedures.**

Notification to Out-of-District Students - During the on-site monitoring it was determined that the district does not notify students placed in out-of-district settings of non-academic/extra-curricular activities available within the district.

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- The district will revise the improvement plan to include procedures to ensure that out-of-district students are afforded the opportunity to participate in non-academic/extra-curricular activities available within the district. The improvement plan must also include in-service and an administrative oversight component to ensure the consistent, compliant implementation of the procedures.

Access To Regular Education - During the on-site monitoring it was determined through interviews with staff that access to regular education programs with supports and services is not based on the individual needs of students, but instead is based on the availability of existing program options in the district.

- The district will revise the improvement plan to include procedures to ensure that students with disabilities have the opportunity to access regular education programs through the provision of appropriate supports and services and according to their individual needs. The plan must also include specific strategies that the district will employ to increase the availability of these supports and services within the district. The plan must include in-service and an administrative oversight component to ensure consistent, compliant implementation of these procedures.

Section X: Transition to Post-School

Summary of Findings:

During the self-assessment process, the district identified concerns regarding the need to provide increased individualized career counseling for students with disabilities at the middle school level, additional training for child study team members and guidance staff regarding post secondary options and services, increased transition services at both the middle and high school level and monitoring transition services provided by outside agencies. The district has developed an improvement plan that does not sufficiently address these areas of need because it lacks procedures, in-service and an administrative oversight component to bring about the required changes. The district will revise the improvement plan to include these elements.

Additional areas of need were identified during the on-site monitoring visit regarding statement of needed transition services, statement of transition service needs and student interests and preferences.

Areas of Need:

Statement of Transition Service Needs - During the on-site monitoring visit, it was determined that students' interests, preferences and identified post-school outcomes are not consistently completed or appropriately documented in their courses of study. It was further identified that specific courses of study are not listed for the coming year as part of the student's Transition Services Needs.

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- **The district will revise its improvement plan to include procedures to ensure that for students age 14 or younger, if appropriate, the Statement of Transition Services Needs identifies interests and preferences and post-school outcomes within the courses of study. The improvement plan must include in-service and an administrative oversight component to ensure consistent, compliant implementation of these procedures.**

Statement of Needed Transition Services - During the on-site monitoring visit, it was determined that although the district has begun to utilize the recommended NJDOE IEP transition section, IEPs still do not consistently contain the requirement components for the statement. Record reviews indicated that the transition categories are either not clearly addressed or left blank. Additionally, it was determined there are inconsistencies between IEP goals and objectives and desired post-school outcomes.

- **The district will revise its improvement plan to include procedures to ensure that beginning at age 16 or younger, if appropriate, the statement of Needed Transition Services contains all required components. The plan must further ensure there is a documented relationship between goals and objectives and desired post-secondary outcomes. The improvement plan must include in-service and an administrative oversight component to ensure consistent, compliant implementation of these procedures.**

Student Interests and Preferences - During the on-site monitoring visit, it was determined that interests and preferences are not consistently documented in the IEP.

- **The district will revise its improvement plan to include procedures to ensure the district documents the student's preferences and interests in the IEP. The plan must further ensure this information is discussed at the beginning of the IEP meeting to ensure an outcome-oriented decision-making process. The improvement plan must include in-service and an administrative oversight component to ensure the consistent, compliant implementation of these procedures.**

Section X: Transition to Preschool

Summary of Findings:

During self-assessment the district accurately identified themselves compliant in the areas of implementing students' IEPs by age 3.

An area of need was identified during the on-site monitoring visit regarding transition planning meetings.

Area of Need:

Transition Planning Meetings - During the on-site monitoring it was determined through record review that child study team members do not attend transition planning

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meetings arranged by the Department of Health and Senior Services in order to ensure a smooth transition from early intervention to preschool.

- **The district will revise the improvement plan to include procedures to ensure that child study team members attend transition planning meetings. The plan must include a mechanism to document this participation as well as an administrative oversight component to ensure implementation of these procedures.**

Section XI: Discipline

Summary of Findings:

During the self-assessment process, the district identified concerns regarding the number of students suspended and placed in an alternate setting, written notification to the case manager, IEP meetings, functional behavior assessments, behavior intervention plans, manifestation determinations, suspension tracking, due process and interim alternative educational settings. The district has developed an improvement plan does not sufficiently address these areas of need because it lacks procedures, in-service and an administrative oversight component to bring about the required changes. The district will revise the improvement plan to include these elements.

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

Section XII: Statewide Assessment

Summary of Findings:

During the self-assessment process, the district identified concerns regarding the alternate assessment, SRA process, content of statewide assessments and the number of students with disabilities who participate in statewide assessment. The district has developed an improvement plan that does not sufficiently address this area of need because it lacks procedures, in-service and an administrative oversight component to bring about the required changes. The district will revise the improvement plan to include these elements.

An additional area of need was identified during the on-site monitoring visit regarding documentation of statewide assessments.

Area(s) of Need:

Statewide Assessments - During the on-site monitoring it was determined that IEPs do not contain a section to document the student's participation in statewide assessment programs, the need for individual modifications/accommodations, a rationale for exemption from participating/passing statewide assessments or how that student will be assessed.

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- **The district will revise the improvement plan to include procedures to ensure that IEPs contain required components regarding participation in the statewide assessment program. The improvement plan must include in-service and an administrative oversight component to ensure the implementation of the procedures. It is recommended that the district use the IEP format developed by the Department of Education, Office of Special Education Programs.**

Section XIII: Graduation

Summary of Findings:

During self-assessment the district accurately identified themselves compliant in the areas of student participation in graduation activities.

During the self-assessment process, the district identified concerns regarding graduation requirements for students. The district has developed an improvement plan that does not sufficiently address this area of need because it lacks procedures, in-service and an administrative oversight component to bring about the required changes. The district will revise the improvement plan to include these elements.

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

Areas of Need:

Written Notice of Graduation - During the on-site monitoring, it was determined through record review that the district does not document the provision of written notice of graduation to parents and adult students.

- **The district will revise the improvement plan to include procedures to ensure the district documents the provision of written notice of graduation to parents and adult students in student files. The improvement plan must include an administrative oversight component to ensure the implementation of the required changes.**

Section XIV: Programs and Services

Summary of Findings:

During self-assessment the district accurately identified themselves compliant in the areas of age range waivers and group sizes for speech.

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During the self-assessment process, the district identified concerns regarding insufficient staff, apportioned time for case management, consultation time for special education and regular education teachers, and class sizes. The district has developed an improvement that does not sufficiently address these areas of need because it lacks procedures, in-service and an administrative oversight component to bring about the required changes. The district will revise the improvement plan to include these elements.

An additional area of need was identified during the on-site monitoring visit regarding home instruction.

Area(s) of Need:

Home Instruction - During the on-site monitoring it was determined the district does not request or obtain approval from the county office prior to implementing a program of home instruction.

- **The district will revise the improvement plan to include procedures to ensure county office approval is received prior to implementing a program of home instruction. The plan must include an administrative oversight component to ensure implementation of these procedures.**

Section XV: Student Records

Summary of Findings:

During self-assessment the district accurately identified themselves compliant in the areas of parent access and maintenance and destruction of records.

Areas of need were identified during the on-site monitoring visit regarding access sheets and documentation of other locations of student files.

Areas of Need:

Access Sheets - During the on-site monitoring it was determined through record review that the district does not consistently maintain access sheets in student files.

- **The district will revise the improvement plan to include procedures to ensure it maintains access sheets in student files.**

Documentation of Other Locations - During the on-site monitoring it was determined that central files do not indicate the location of all student records maintained by the district. Specifically, those records that are maintained by the Student Success Committee.

- **The district will revise the improvement plan to include procedures to ensure that the location of other records maintained by the district is identified in central files.**

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Summary

On-site special education monitoring was conducted in the Ewing School District on January 22 & 23, 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. As a result of this review the district was able to identify areas of need and develop an improvement plan that with some revision, will be sufficient to bring about systemic change.

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During a focus group meeting held prior to the on-site monitoring, the twenty-five to thirty parents who attended expressed satisfaction with such issues as teacher and parent communication, transition from early intervention programs to preschool, as well as many of the district's programs and services. However, parents also raised concerns regarding wheelchair accessibility at the high school, reporting of student progress and changes in IEPs without benefit of an IEP meeting.

A standard identified as consistently compliant by the district during self-assessment and verified during the on-site monitoring visit included Eligibility.

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 information to parents, certification, surrogate parents, consent, independent evaluations, provision of written notices within timelines, reevaluations completed by June 30th for preschoolers, eligibility meetings, statement of eligibility, implementation dates, teacher access to IEPs, implementing students' IEPs by age three, out-of-district student participation in graduation, age range waivers, group sizes for speech, parent access to records and maintenance/destruction of student records.

During the self-assessment process, the district identified areas of need regarding staff/parent development the continuum, provision of related services, translation resources for non-English speaking parents, discrepancy formulas, reevaluation timelines, participants at meetings, documentation of goals/objectives in IEPs, progress reporting/benchmarks, student placement according to IEPs, discipline procedures, statewide assessment and graduation requirements.

The on-site visit identified additional areas of need within the various standards regarding, facilities, goals and objectives for related services, length of school day, extended school year, transfer procedures, 20-day timeline, notices in native language, interpreters, pre-referral interventions child find activities, components of functional assessments, assessments/reports, native language assessments, accept/rejection of reports, considerations/required statements, age of majority, annual review timeliness, 90-day timelines, documentation of provision of IEP/evaluation reports to parents, PLEP statements, changes in students' programs, regular education teachers' responsibility in implementing IEPs, LRE statement, notification to out-of-district students, access to regular education, transition services, transition planning meetings, statewide assessment, written notice of graduation, home instruction, access sheets and documentation of other locations in student files.

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.