District: Franklin Township School District County: Gloucester

Monitoring Dates: April 20 and 22, 2004

Monitoring Team: Caryl Carthew, Michael Lee and Kenneth Richards

Background Information

During the 2002-2003 school year, the Franklin 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 Franklin 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 Franklin Township School District 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 Administrative Offices on February 24, 2004. Information obtained from that meeting was used to direct the focus of the monitoring visit.

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 principals, general education and special education teachers, speech therapists, related services providers, school nurses and child study team members.

District Strengths:

The district is commended for the variety of support programs offered to students by members of the child study team. Each team member spends one period a week in classrooms with students who require assistance in the areas of coping skills, social and

organizational skills or anger management. This allows case managers to address issues within the classroom environment and to develop practical instructional strategies.

Annually, social workers conduct workshops for students who are experiencing difficulties due to divorce or separation in the family. The learning disability teacher/consultants provide on-the-spot tutoring for students experiencing difficulties with specific academic topics. School psychologists are involved in the implementation of weekly ADHD support groups for students who require assistance in understanding their disability.

The district is also commended for providing a variety of summer programs in addition to the traditional extended school year program. A seven week (70 hour) Fast ForWord program has been provided in the past as well as a seven week (53 hour) multi sensory, intensive reading camp. Participation in these programs is based on the recommendations of the speech/language specialist, classroom teacher and/or parent.

Part One Data Summary:

The district's data for the last two years indicates they are equal to the state's average of 42% for placement of students in general education programs for more than 80% of the school day. This represents a 5% increase sine 1999.

Areas Demonstrating Compliance With All Standards:

Reevaluation, Discipline, Preschool Transition and Statewide Assessment 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 the district accurately identified themselves compliant in the areas of policies, procedures and dissemination of IDEA information.

During the self-assessment process, the district identified concerns in the area of staff training. The district's improvement plan is insufficient to address the area of staff training because it lacks a component to determine the effectiveness of the training. The plan needs to be revised to include this component.

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

Section II: Free and Appropriate Public Education

Summary of Findings:

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

An area of need was identified during the on-site visit regarding related services.

Area of Need:

Related Services – Information obtained through record review and interviews determined that counseling goals and objectives are not developed when counseling is required as a related service. Instead, IEPs include general social and emotional goals.

• The district will revise its improvement plan to include activities that ensure counseling goals and objectives are specifically developed and included in the IEP. Implementation of these activities will ensure students requiring counseling as a related service will have specific and individual counseling goals and that the parent, student and counselor are informed of these specific goals. The improvement plan must include an administrative oversight component to ensure the consistent implementation of these activities.

Section III: Procedural Safeguards

Summary of Findings:

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

Areas of need were identified during the on-site visit regarding notice of meeting and written notice for students eligible for speech and language services.

Areas of Need:

Notice of Meeting – Information obtained through record review determined that notice of meeting for a initial evaluation does not inform the parent that others with expertise may be invited to a meeting.

Written Notice – Information obtained through record review determined that notice of a meeting following an initial evaluation planning meeting for students eligible for speech and language services does not consistently document a description of factors used in making decisions, options considered/rejected and why rejected and a description of other relevant factors.

 The district will revise its notice of a meeting form and its written notice forms to include all required components. It is recommended the district adopt the notice forms developed by the Office of Special Education Programs.

Section IV: Location, Identification and Referral

Summary of Findings:

During self-assessment the district accurately identified themselves compliant in the areas of child find activities, direct referrals, health summary, vision and hearing screenings and identification timelines.

During the self-assessment process, the district identified concerns in the area of the pre- referral process and pre-referral interventions. The district's improvement plan is insufficient to address these areas of concern because it lacks an administrative oversight component to ensure the consistent implementation of the procedures. The plan needs to be revised to include this component.

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

Area of Need:

Participants – Information obtained through record review determined that when a preschool age student is referred for an initial evaluation, a general education teacher is not in attendance at the identification meeting.

The district will revise its improvement plan to include activities to ensure a general education teacher is in attendance at the identification meeting and participates as a member of the identification team. Implementation of these activities will ensure all required participants are involved in the decision-making process in determining the need for an evaluation as well as the nature and scope of the evaluation. The improvement plan must include an administrative oversight component to ensure the consistent implementation of these activities.

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, standardized assessments, bilingual evaluations and functional assessments for students eligible for special education and related services.

Areas of need were identified during the on-site visit regarding acceptance and rejection of reports, functional assessments conducted for students eligible for speech and

language services and written reports for students eligible for speech and language services.

Areas of Need:

Functional Assessments – Information obtained through record review determined that functional assessments conducted for students eligible for speech and language services does not consistently include a parent interview and teacher interview.

• The district will revise its improvement plan to include activities to ensure functional assessments contain all required components. Implementation of these activities will ensure reports contain sufficient information upon which eligibility determination can be made. The plan must include an administrative oversight component to ensure the consistent implementation of the procedure.

Written Reports – Information obtained through record review determined that written reports for students eligible for speech and language services do not consistently include a statement regarding how the speech issues impact academic functioning.

• The district will revise its improvement plan to include activities to ensure written reports prepared for students eligible for speech and language services include a statement regarding how the speech issues impact the student's academic functioning. Implementation of these activities will ensure services are provided only when there is an educational impact. The plan must include an administrative oversight component to ensure the consistent implementation of the procedure.

Acceptance and Rejection of Reports – Information obtained through record review determined that acceptance or rejection of written reports and assessments and why all or part were rejected is not consistently done.

• The district will revise its improvement plan to include activities to ensure the IEP team documents the acceptance or rejection of all or parts of reports as well as the reason for any rejection of reports and assessments provided to the district. Implementation of these activities will ensure reports are reviewed and considered by the district and that the parent is aware of the reasons why the district is not accepting a report or a part of a report. The plan must include an administrative oversight component to ensure the consistent implementation of the activities.

Section VII: Eligibility

Summary of Findings:

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

An area of need was identified during the on-site visit regarding signature of agreement and disagreement.

Area of Need:

Signature of Agreement and Disagreement/Rationale – Information obtained through record review and the interview process determined that general education and special education teachers do not certify in writing their agreement or disagreement with eligibility determinations. Teachers were not aware that they were required to do so. Record review also determined that signature of agreement or disagreement is not documented by any team member for students eligible for speech and language services.

• The district will revise its improvement plan to include activities to ensure required staff certify in writing their agreement or disagreement with eligibility determinations. Implementation of these activities will ensure parents are provided with the information regarding dissenting opinions and the reason for that dissention. The plan must include an administrative oversight component to ensure the consistent implementation of the procedure.

Section VIII: Individual Education Plan

Summary of Findings:

During the self-assessment the district accurately identified themselves compliant in the areas of meetings, implementation dates, annual review timelines, goals and objectives/core curriculum content standards, IEPs to parents, 90-day timelines, and teacher access and responsibilities.

During the self-assessment process, the district identified concerns in the area of present levels of educational performance (PLEP) development. The district's improvement plan is sufficient to address this area of concern.

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

Area of Need:

Meeting Participants – Information obtained through record review determined that general education teachers do not attend annual review meetings conducted for preschool children.

 The district will revise its improvement plan to include activities to ensure general education teachers are in attendance at annual review meetings for preschool children. Implementation of these activities will ensure decisions are based on input from all required members of the team and to ensure necessary information is obtained to appropriately consider

placement options in general education settings with appropriate supports and services. The plan must include an administrative oversight component to ensure the consistent implementation of the procedure.

Section IX: Least Restrictive Environment

Summary of Findings:

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

During the self-assessment process, the district identified concerns in the areas of preschool individual decision-making, general education access and continuum. The district also identified concerns in the area of placement in early childhood programs with appropriate supplemental aids and services as the first placement option for preschoolers. In the past the district operated an inclusive preschool program which provided services to preschool disabled and general preschool students. This program was eliminated due to budgetary constraints. The district's improvement plan indicates that an inclusive preschool program will be established within the district beginning in September 2004. The district also identified concerns in the area of participation in extra curricular and non-academic activities. A lack of consistent communication between staff was identified as the barrier. The district's improvement plan is insufficient to address this area of concern because it lacks an administrative oversight component to ensure the improvement plan brings about the required corrective action. The plan needs to be revised to include this component.

An additional area of need was identified during the on-site visit regarding school age continuum and individual decision-making.

Area of Need:

Continuum and Individual Decision-Making – Information obtained through the interview process and record review determined that because the district has a limited number of in-class support classes, team members do not recommend this program even though they believe it is appropriate.

• The district will revise its improvement plan to include activities to ensure a full continuum of options is available and that placement decisions are based on the individual needs of the students and not on the availability of program options. Implementation of these activities will ensure each student receives the program within a setting that is appropriate to address the individual needs of the student. The plan must include an administrative oversight component to ensure the consistent implementation of the procedure.

Section X: Transition to Post-School

The Franklin Township School District provides service through grade six.

Section XIII: Graduation

The Franklin Township School is an elementary school district and is not required to address graduation as it pertains to secondary school requirements.

Section XIV: Programs and Services

During self-assessment the district accurately identified themselves compliant in the areas of class size, age range and home instruction.

During the self-assessment process the district identified concerns in the area of speech/language specialists not having sufficient time to effectively communicate with teachers to gather feedback and information about their students. The district's improvement plan is sufficient to address this area of concern.

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

Section XV: Student Records

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

An area of need was identified during the on-site monitoring visit regarding documentation of location of other records.

Area of Need:

Documentation of other Records – Information obtained through record review determined that central files do not document the location of other student records.

 The district will revise its improvement plan to include activities to ensure central files document the location of other student records maintained by the district. Implementation of these activities will ensure the parent and other authorized individuals are made aware that student records are maintained in other locations. The plan must include an administrative oversight component to ensure the consistent implementation of the procedure.

Summary

On-site special education monitoring was conducted in the Franklin Township School District on April 20 and 22, 2004. The purpose of the monitoring 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 comprehensive review conducted during the self-assessment process. As a result of that review the district was able to identify areas of need and develop an improvement plan that with some revision will bring about systemic change. The district is further commended for the many areas determined by the district and verified by the Office of Special Education Programs as compliant with federal and state statutes and regulations.

At a focus group meeting held prior to the monitoring visit, parents expressed satisfaction and some concern with district programs. Parents expressed satisfaction with the district's transfer procedures and indicated that students are placed in programs in a timely manner. Parents indicated that students have current IEPs and that programs are implemented as identified in the IEP. Parents expressed a high level of satisfaction with transition planning that result in the provision of services by age three. Parents expressed concern regarding the lack of an inclusive preschool program within the district. Parents stated that, from their perspective, the referral process is sometimes slow. Parents also expressed strong support for a parent support group and training in the areas of IEP development and parental rights.

Areas demonstrating compliance with all standards included Reevaluation, Discipline, Preschool transition and Statewide Assessment.

Areas identified as consistently compliant by the district during self-assessment and verified during the on-site monitoring included policies, procedures, dissemination of IDEA information, extended school year, length of school day/year, transfer students, facilities, certifications, surrogate parents, consent, meetings, notice in native language, interpreters at meetings, independent evaluations, child find activities, direct referrals, health summary, vision and hearing screenings, identification timelines, multi-disciplinary assessments, standardized assessments, bilingual evaluations, functional assessments for students eligible for special education and related services, eligibility meetings, participants, criteria, statement of eligibility, copy of evaluation reports to parents, annual review meetings, annual review timelines, core curriculum content standard, IEP to parents, 90 day timelines, teacher access, responsibilities, Oberti documentation, preschool transition planning conference, early intervention to preschool by age three, class size, age range, home instruction, parent access to records and maintenance and destruction of student records.

During the self-assessment process, the district identified areas of need regarding staff development, pre-referral process and interventions, present levels of educational performance (PLEP), preschool continuum and individual decision-making and speech/language consultation time.

The on-site visit identified additional areas of need within the various standards regarding counseling goals and objectives, written notice, identification meeting participants, functional assessments conducted for students eligible for speech and language services, written reports conducted for students eligible for speech and

language services, acceptance and rejection of reports, signature of agreement and disagreement/rationale regarding determination of eligibility, annual review meeting participants, school age continuum and individual decision-making, and documentation of location of student records.

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