

**New Jersey Department of Education  
Special Education Monitoring**

**District:** Freehold Regional

**County:** Monmouth

**Monitoring Dates:** October 16-19, 2000

**Monitoring Team:** C. Carthew, J. Marano, K. Richards, A. Popovici, and P. Fair.

**Background Information**

During the 1999-2000 school year, the Freehold Regional High School District conducted a self-assessment of policies, procedures, programs, services, and student outcomes. This self-assessment component of the monitoring process provided the Freehold Regional High School District with an opportunity to evaluate its strength and areas of need with regard to:

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

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

The Office of Special Education Programs conducted an on-site monitoring visit to verify the issues identified and address the appropriateness of the improvement plan and 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 Manalapan High School on October 10, 2000. From this initial focus group meeting, themes were identified that would later be verified during the on-site visit. In addition to these themes, information from previous monitoring activities was available to the team and helped to direct the focus of the monitoring visit.

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

**New Jersey Department of Education  
Special Education Monitoring**

study team members, including speech-language specialists. Input was also received from parents of students with disabilities. In addition, each of the district's high schools was visited and a number of both general and special education teachers from each school were interviewed.

District compliance with the requirements of the Individuals with Disabilities Education Act (IDEA) and the New Jersey Administrative Code for Special Education (N.J.A.C. 6A:14) was assessed. Areas identified by the district as compliant were reviewed to verify compliance. Systemic areas of need are identified in the findings below.

**Statement of Findings**

**I. General Provisions**

**Summary of Findings:**

The Freehold Board of Education adopted the Policies/Statement of Assurances required by the New Jersey Department of Education. The district is currently in the process of developing procedures to implement policies as required by OSEP. The district accurately identified compliance with submission of annual reports to OSEP and the provision of public documents to parents when requested.

During the self-assessment process, the district identified the need for more training for professionals and paraprofessionals.

**Areas of Need:**

**Staff Development** – During self-assessment, the district identified ongoing staff development needs in the areas of in-class support, behavior interventions, including preventative strategies, and core curriculum content standards. Both special education and regular education staff cited training needs in these areas as critical to achieving positive outcomes in the district's inclusive programs. The district's improvement plan includes staff development activities in each of these areas, however, the plan does not identify follow-up activities to evaluate the effectiveness of the training.

- The district is directed to revise its improvement plan to include follow-up activities that will be used to evaluate the effectiveness of staff development efforts.

**II. Free, Appropriate Public Education**

**Summary of Findings:**

The district accurately assessed compliance in the areas of certification, length of the school day, transfer procedures, and the provision of special education programs and related services as required by the IEP.

**New Jersey Department of Education  
Special Education Monitoring**

- During the self-assessment process, the district identified the need for: 1) an in-district extended school year (ESY) program; 2) an in-district alternative high school program; and 3) preventive counseling services. The district has developed an improvement plan that sufficiently addresses the need for an in-district alternative high school program.

Additional areas of need were identified during the on-site visit regarding level of counseling services, speech-language services, consideration of the need for extended school year, participation in nonacademic and extracurricular activities for students placed in out-of-district settings, and facilities.

**Areas of Need:**

**Extended School Year** – During self-assessment, the district indicated a need for an in-district ESY program. In addition, the district indicated that the rationale of the need for an ESY program is not consistently documented in the IEP. During the on-site monitoring, interviews with parents and school personnel as well as record review indicate that, in addition to a need for an in-district program, extended school year is not consistently considered and discussed for all students. A review of student IEPs indicates that extended school year services are provided primarily for students in out-of-district placements.

- The district is directed to revise its improvement plan to ensure that ESY programs are considered on an individual basis for all classified students and that documentation of this discussion is maintained.

**Counseling Services** – During the self-assessment process, the district identified the need to initiate preventative counseling services to students with disabilities. In addition, record review and interviews with teaching staff and CST members indicated that the determination of the level of counseling services provided is neither individually determined nor based on student need.

- The district is directed to revise its improvement plan to ensure that the provision of counseling as a related service is based on the individual needs of the student.

**Speech-Language Services** – A review of speech schedules, therapy logs, and interviews with staff and parents indicate that speech-language services routinely begin in October and, in the majority of cases, end prior to June. Interviews indicate that this shortened schedule of services occurs due to a need to complete assessments, develop schedules, and complete case management responsibilities. In addition, a review of IEPs indicates that duration of speech-language services is not consistently identified.

- The district is directed to revise its improvement plan to ensure that the duration of speech-language services is documented in IEPs and that starting and ending dates for these services are based on the individual needs of students.

**New Jersey Department of Education  
Special Education Monitoring**

**Facilities** – During on-site monitoring, a visit to Manalapan High School and an interview with the principal indicated that for at least three periods during the school day, two classes are held concurrently in the building’s media center. In addition, during these periods, other students/classes are permitted to sign up to conduct research. During a classroom visit by one of the monitors, it was observed that two classes were being conducted with an additional 30+ students using the media center for research purposes. Approval from the county office is required for dual-use of instructional space and the district was unable to demonstrate that appropriate approvals were obtained. The county office has been notified of this situation.

**III. Procedural Safeguards**

**Summary of Findings:**

The district accurately assessed compliance in the areas of the provision and training of surrogate parents, provision of the Parental Rights in Special Education (PRISE) document, independent evaluations, and the components of written notice for an initial evaluation determination.

During the self-assessment process, the district identified areas of need with regard to documentation of attempts to secure parental participation at meetings, notification of the transfer of rights at the age of majority, and the provision of written notice within 15 days of the determination. The district has developed an improvement plan that is sufficient to address the areas of parental participation and the provision of notice.

Additional areas of need were identified during the on-site visit regarding notice of a meeting, written notice, meeting participants, native language, and the provision of N.J.A.C. 1:6A (due process hearing rules).

**Areas of Need:**

**Transfer of Rights** –During the self-assessment process, the district identified concerns with the notification of transfer of rights prior to the age of majority. It was the district’s intent to include this documentation in the IEP and to develop a separate written notice. In addition, a review of the improvement plan indicates that this notification does not occur at least three years prior to the age of majority, as required.

- The district is directed to revise its improvement plan to ensure that parents and students are consistently notified at least three years before the student turns 18 that all rights transfer when the student reaches the age of majority.

**Written Notice** –During the on-site monitoring, a review of records indicated that the format for written notice used by the district does not contain the elements of written notice according to N.J.A.C. 6A: 14-2.3 (e).

**New Jersey Department of Education  
Special Education Monitoring**

- The district is directed to revise its written notice to include: an explanation of why it is taking a specific action; a description of any options the district considered and the reason why those options were rejected; and a description of any other factors that are relevant. The district is encouraged to use the letters developed by the Office of Special Education Programs.

**Notice of a Meeting** – A review of records indicated that notice of an identification meeting contains the required components. However, subsequent meeting notices, when the purpose is to review and/or revise the IEP, were missing the statement that the parents have the option to include as participants other individuals who have knowledge or special expertise regarding this student. In addition, these meeting notices did not consistently identify the participants by discipline.

- The district is directed to revise its notice of a meeting to include a statement that the parent has the right to invite a person with special expertise to the meeting and to identify the district participants by discipline. The district is encouraged to use the letters developed by the Office of Special Education Programs.

**Meeting Participants** – During on-site monitoring, a review of records and interviews with staff and parents indicate that regular and special education teachers do not consistently attend meetings and the full child study team does not attend the identification meeting.

- The district is directed to revise its improvement plan to include procedures to ensure that all the required participants attend meetings.

**Native Language** –Written notice is not consistently provided in native language. In addition, while interviews with staff indicate that interpreters are provided at meetings, parents report that interpreters do not consistently attend. Written documentation of meeting participants supports that foreign language interpreters inconsistently participate at meetings.

- The district is directed to revise its improvement plan to ensure that written notice is provided in the native language of the parent whenever feasible and that meetings are conducted in the native language of the parent whenever feasible. The plan must include a mechanism for documenting the participation of the interpreter.

**Procedural Safeguards** –Although the district documents in written notice that a copy of N.J.A.C. 1:6A (the due process hearing rules) is provided to parents, district personnel were unable to produce a copy of the rules.

- The district is directed to revise its improvement plan to ensure that N.J.A.C. 1:6A is provided as required.

**New Jersey Department of Education  
Special Education Monitoring**

**IV. Location, Referral and Identification**

**Summary of Findings**

The district accurately identified compliance with the direct referral process. The district has also established a PAC/Core team in each building.

During the self-assessment process, the district identified areas of need regarding pre-referral interventions, vision/hearing screenings and written notice timelines. The district has developed an improvement plan that is sufficient to address vision and hearing issues.

Additional areas of need were identified during the on-site visit regarding Child Find activities, identification meetings, and summer referrals.

**Areas of Need:**

**Pre-referral interventions** – During the self-assessment process, the district identified concerns with consistently maintaining written documentation (lesson plans, reports, notes, etc.) of the implementation and effectiveness of interventions by the staff of general education programs. In addition, the district indicated that there was a need to reduce the caseloads of guidance counselors and other staff involved in pre-referral interventions to allow sufficient time for providing counseling to promote social and emotional growth.

- The district is directed to revise its improvement plan to ensure that pre-referral intervention strategies are documented and evaluated for effectiveness. In addition, the plan must identify the manner in which the district will provide counseling services, when needed, as part of the pre-referral process.

**Written Notice Timelines** – During the self-assessment process, the district indicated that written notice of the proposed action of evaluation is not consistently provided to parents within 15 days. The district's improvement plan indicates that this issue will be monitored for compliance, however, specific oversight activities are not identified.

- The district is directed to revise its improvement plan to identify specific oversight activities that will ensure the provision of written notice to parents within 15 days.

**Child Find Activities** – Because the location and identification of students with disabilities is primarily conducted through the middle school sending districts, Freehold Regional High School District has not developed adequate activities in this area.

- The district is directed to revise its improvement plan to expand Child Find activities for high school students enrolled in the district.

**New Jersey Department of Education  
Special Education Monitoring**

**Identification Meetings** – During the on-site monitoring, it was noted that the district does not consistently conduct identification meetings within 20 days of referral.

- The district is directed to revise its improvement to ensure that identification meetings are conducted within 20 days of referral.

**Summer Referrals** – During on-site monitoring, record reviews and interviews with staff indicated that referrals during the summer months are not consistently addressed within required timelines. At times, these referrals are not addressed until child study team members return prior to the opening of school.

- The district is directed to revise its improvement plan to ensure that summer referrals are processed within required timelines. The plan must include a mechanism to determine appropriate staffing needs.

**V. Protection in Evaluation**

**Summary of Findings:**

The district accurately identified compliance in the areas of informed consent, conducting multi-disciplinary assessments, the use of standardized assessments, reports that are both signed and dated and the use of bilingual evaluations when need is identified.

During the self-assessment process, the district identified areas of need regarding the documentation of acceptance and rejection of reports, and speech-language evaluations. The district has developed an improvement plan that is sufficient to address these areas of need.

Additional areas of need were identified during the on-site visit regarding functional assessments.

**Areas of Need:**

**Functional Assessments** – Written reports of child study team members do not consistently include an observation of the student in other than a testing situation, particularly if the student is evaluated during the summer. In addition, reports do not consistently include an interview with the child's teacher. When the social history is not part of the evaluation plan, a parent interview is not consistently documented.

- The district is directed to revise its improvement plan to ensure evaluations consistently include an observation of the student in other than a testing situation, an interview with the child's teacher, and an interview with the parent.

**New Jersey Department of Education  
Special Education Monitoring**

**VI. Reevaluation**

**Summary of Findings:**

The district accurately identified compliance with policies and procedures to ensure that students with disabilities are evaluated every three years or sooner if conditions warrant, that planning meetings are held and parental consent is obtained.

Areas of need were identified during the on-site visit regarding the components of notice of meeting and appropriate participants at IEP meetings. These areas have been addressed in Section III – Procedural Safeguards.

**VII. Eligibility**

**Summary of Findings:**

The district accurately identified that eligibility meetings are conducted as required.

During the self-assessment process, the district identified areas of need regarding documentation of the provision of evaluation reports to parents and development of a district-wide discrepancy formula for determining a Specific Learning Disability. The district has developed an improvement plan that is sufficient to address these areas of need.

Additional areas of need were identified during the on-site visit regarding meeting notice, meeting participants and written notice of eligibility. Notice issues and meeting participants have been addressed in Section III – Procedural Safeguards.

**VIII. Individualized Education Programs**

**Summary of Findings:**

The district accurately identified compliance with implementation dates for the IEPs.

During the self-assessment process, the district identified areas of need regarding the provision of the IEP to parents and informing instructional staff of the content of IEPs, participants, annual reviews, revisions to IEPs, and IEP components. The district has developed an improvement plan that is sufficient to address the areas regarding IEP participants, revisions, and components.

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

**Areas of Need:**

**Provision of the IEP** – During the self-assessment process, the district indicated that parents do not consistently receive a copy of the IEP prior to its implementation. In



**New Jersey Department of Education  
Special Education Monitoring**

addition, the district indicated that staff members are not consistently of their instructional responsibilities as specified in student IEPs. Although the district's improvement plan indicates that a new IEP computer program will be utilized that identifies all persons responsible for IEP implementation, the plan does not identify procedures to inform district personnel of its contents.

- The district is directed to revise its improvement plan to identify the specific procedures that will be implemented to ensure that staff members with instructional responsibility for IEP implementation are consistently informed of its contents.

**Annual Reviews** – During the self-assessment process, the district indicated that annual reviews are not conducted within required timelines. The district identified excessive caseload, lack of staff, and lack of technology as impacting on these timelines. The district's improvement plan indicates that annual reviews will be conducted within timelines but does not identify procedures that will ensure implementation.

- The district is directed to revise its improvement plan to identify the procedures it will implement to ensure that annual reviews are conducted within required timelines. The plan must include an administrative oversight component to ensure full implementation of these procedures.

**Frequency, Location, and Duration of Speech Services** –During the on-site monitoring, a review of records indicated that IEPs did not consistently document the frequency, location, and duration of speech as a related service. Although the district IEP format identifies a space for this information, the inclusion of this information was either inconsistent or the information was inconsistent with the actual services being provided.

- The district is directed to revise its improvement plan to ensure that IEPs accurately document the frequency, location, and duration of speech-language services. The plan must include an oversight component to ensure the provision of services in accordance with IEPs.

## **IX. Least Restrictive Environment**

### **Summary of Findings:**

The district accurately identified compliance with participation in non-academic and extracurricular activities and provision of supplementary aids and services.

During the self-assessment process, the district identified a need for more in-district special education programs. In addition, the district has indicated that regular education is not consistently considered as a first option and there is a need for better documentation of the decision-making process. The district has developed an improvement plan that is sufficient to address these areas of need.

**New Jersey Department of Education  
Special Education Monitoring**

**X. Transition**

**Summary of Findings:**

The district accurately identified compliance with documentation of agency participation and student invitation to IEP meetings.

During the self-assessment process, the district identified concerns with documentation of the statement of transition service needs, statement of needed transition services, identification of student interests and preferences, a statement of interagency responsibilities, and identification of the post-secondary liaison. In addition, IEP goals and objectives do not consistently match the student's interests and preferences. The district has developed an improvement plan that is sufficient to address these areas of need.

**XI. Discipline**

**Summary of Findings:**

The district accurately identified compliance with implementation of the same disciplinary procedures for regular and special education students and notification to parents of the discipline code.

During the self-assessment process, the district identified concerns with notification to the case manager when disciplinary actions occur, convening an IEP meeting prior to the tenth day of removal, conducting manifestation determinations, reviewing behavior intervention plans, and consultation with special education teachers regarding extent of services. The district has developed an improvement plan that is sufficient to address these areas of need.

Additional areas of need were identified during the on-site visit regarding behavior intervention plans.

**Areas of Need:**

**Behavior Intervention Plans**—A review of records indicates that IEPs do not consistently include behavior plans for students with a history of behavior difficulties.

- The district is directed to revise its improvement plan that identifies the procedures it will implement to ensure that behavior intervention plans are developed for students with a history of behavior difficulties.

**New Jersey Department of Education  
Special Education Monitoring**

**XII. Statewide Assessment**

**Summary of Findings:**

The district accurately assessed compliance with IEP documentation of accommodations and modification for statewide assessments.

During the self-assessment process, the district identified areas of need with consistent implementation of IEP modifications and accommodations and documentation of alternative assessments. In addition, the district has identified a need to decrease the number of student exemptions from participation in statewide assessments, a need to increase the numbers of students participating in the SRA process, when appropriate, and a need for CST members to be more knowledgeable of the content of statewide assessments. The district has developed an improvement plan that is sufficient to address all but one of these areas of need.

**Areas of Need:**

**Exemptions from Statewide Assessments**—During the self-assessment process, the district identified a need to decrease the number of exemptions that are given to classified students.

- The district is directed to revise their improvement plan to ensure that classified students are not automatically exempt from the assessment process.

**XIII. Graduation**

**Summary of Findings:**

The district accurately assessed compliance with participation in graduation. Students are encouraged to participate in the graduation exercises. The district has indicated a continued commitment to encourage students with disabilities to complete their high school education.

During the self-assessment process, the district identified areas of need regarding documentation of graduation requirements in the IEP. 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 visit regarding the provision of written notice of graduation.

**Areas of Need:**

**Written Notice of Graduation**—A review of student records and interviews with staff members indicate that the district does not consistently provide written notice of graduation.

**New Jersey Department of Education  
Special Education Monitoring**

- The district is directed to revise its improvement to ensure that students receive written notice of a proposed change in placement prior to graduation.

**XIV. Programs and Services**

**Summary of Findings:**

The district accurately identified compliance with employment of appropriately certified CST members and special education service providers.

During self-assessment the district identified concerns with the high caseloads of child study team members, provision of teacher consultation time and the need for a larger pool of teachers for home instruction. The district has developed an improvement plan that is sufficient to address these areas of need.

Additional areas of need were identified during the on-site visit regarding class sizes.

**Areas of Need:**

**Class Size**—A review of class lists and classroom observations indicate that instructional group sizes for in-class support programs exceed the required ratios.

- The district is directed to revise its improvement plan to ensure that the numbers of students enrolled in in-class support classes does not exceed the maximum of nine students allowed by code. The plan must include the submission of documentation to the Office of Special Education Programs of the changes in programs for those students who are removed from oversubscribed classes.

**XV. Student Records**

**Summary of Findings**

The district accurately identified compliance with teaching staff having access to IEPs for students of whom they have instructional responsibility and procedures for maintenance and destruction of records.

Areas of need were identified during the on-site visit regarding identification of location of other student records and maintaining access sheet in files.

**Areas of Need:**

**Location of Student Records** – The central files did not consistently identify the location of other records maintained in the district.

**New Jersey Department of Education  
Special Education Monitoring**

- The district is directed to revise its improvement plan to ensure that central files identify the location of all other student records maintained by the district.

**Access Sheets for Student Records** – Access sheets were inconsistently maintained in student files.

- The district is directed to revise its improvement plan to ensure that student files contain access sheets.

**New Jersey Department of Education  
Special Education Monitoring**

**SUMMARY**

An on-site special education monitoring was conducted in the Freehold Regional High School District on October 16<sup>th</sup>, 17<sup>th</sup>, 18<sup>th</sup>, and 19<sup>th</sup>, 2000. The purpose of the monitoring was to verify the district's report of findings resulting from self-assessment and to review the district's improvement plan. As a result of the thorough and comprehensive review conducted by the district during the self-assessment process, the district was able to self-identify a number of areas that require improvement as well as develop an improvement plan that is sufficient to address most of the identified areas.

At a focus group meeting held prior to the visit, parents expressed their satisfaction with many of the district's programs and services. 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.

During the self-assessment process, the district identified areas of need regarding staff development; planning for in-district extended school year and alternative high school programs; notification of transfer of rights; pre-referral intervention strategies; timelines for the provision of written notice and conducting annual reviews; CST caseloads; documentation of transition activities, graduation requirements, and attempts to secure parent participation; components of the IEP and documentation of the placement decision-making process; and a need to increase student participation in statewide assessments.

The on-site visit identified additional areas of need within the various standards regarding procedures for notifying parents of out-of-district students regarding extracurricular activities; Child Find activities; the decision-making process for extended school year; timelines for identification meetings and completion of summer referrals; meeting participants; documentation of the location of pupil records; IEP documentation of related services; development of behavior intervention plans; and provision of written notice of graduation.

The on-site visit further determined that the district provides special education and related services as required by IEPs; employs appropriately certified personnel; utilizes appropriate transfer procedures; locates and trains surrogate parents; conducts evaluations to determine eligibility; conducts independent evaluations and bilingual evaluations as required; requests and obtains consent from parents; employs appropriate procedures for maintaining and destroying pupil records; and conducts meetings with parents as required.

Within forty-five (45) days of receipt of the monitoring report, the district is required to revise its improvement plan to address the additional areas of need and to resubmit the plan to the Office of Special Education Programs.