**District:** Gateway Regional School District **County:** Gloucester

Monitoring Dates: October 14, 15 and 16, 2003

Monitoring Team: Jane Marano, Kenneth Richards and Michael J. Lee

## Background Information:

During the 2002-2003 school year, the **Gateway Regional School District** conducted a self-assessment of policies, procedures, programs, services, and student outcomes. This self-assessment component of the monitoring process provided the Gateway Regional School District with an opportunity to evaluate its performance 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 permit the district the opportunity to identify its areas of strength and promising practices, as well as areas needing improvement and areas that may be noncompliant with state and federal requirements. The Gateway Regional 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 Gateway Regional High School on the evening of September 24, 2003. Information obtained from that meeting was used to direct the focus of the monitoring visit.

During the on-site visit, the OSEP team reviewed district documents, 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 administrator, building principals and vice principals, guidance personnel, general education and special education teachers, related services providers, the school nurse, and child study team members.

## District Strengths:

The Gateway Regional School District is commended for establishing the Gateway Group, a consortium of the four (Kindergarten to 6<sup>th</sup> grade) sending schools from the nearby municipalities and its own (7<sup>th</sup> to 12<sup>th</sup> grade) receiving high school. This group meets regularly to address the needs of its students by sharing the available

professional services, coordinating training activities and strategies, planning for the continuum of programs, and discussing and problem-solving common issues.

The district is commended for the large number of innovative programs provided to students, and, for some, provided by students. The district offers an academic support group during the school year for students who are in jeopardy of failing and would not be able to retake a course over the summer. This program provides not only instructional assistance but also training in how to study for a test, to manage anxiety and social fears, and to build more effective organizational skills. The district's Bridge Program offers hospital-based crisis resolution and social problem solving, where students are trained to work with other students. Through the Reaching Everyone By Exposing Lies (REBEL) program, high school students visit the four sending elementary schools and facilitate dialog with students concerning anti-smoking and anti-drug-and-alcohol issues.

The district is also commended for the six-month orientation program, coordinated by the middle school guidance counselor, which prepares the incoming seventh graders for the transition to high school. Further, the district provides a wide variety of clubs and activities open to all students, including those with disabilities. The district newsletters, Gator Review and The Gator Gazette, serve to reach out to both in-district and out-of-district students and highlight these and other programs and events.

The district operates the PowerSchool program which not only enables parents to electronically access information regarding their children's grades and attendance, via real-time and password-protected means, but also maximizes data collection and tracking for school administrators. In addition, parents, teachers and child study team members are able to effectively communicate through email, allowing an enhanced and more immediate manner of communication. Teachers, utilizing iBook laptop computers, are provided with wireless infrastructure supports leading to enhanced instruction and classroom presentations.

The district is also recognized for its supported and replacement programs and the cooperative relationships between the special education teachers and the general education staff as well as for its transition curriculum and preparation activities for students as they ready themselves for post-graduation life. These activities include the cooperative arrangements established with the Ability Center and Camwerks.

## Data Summary:

The Gateway Regional School District's percentage of special education students to its resident enrollment numbers has been 17.8%, 19.1%, 20.1% and 21.4%, for the past four years. The district indicated a significant number of students are entering Gateway classrooms already classified. However, upon reevaluation, the district continues to find nearly all students eligible for programming and services. The district has identified a need in its improvement plan to assess this situation, within Gateway's school and with the four sending schools, in greater detail. The district's plan indicates strategies to expand general education resources, to enhance pre-referral interventions, as overseen by the Pupil Assistance Committee (PAC), and to evaluate the district's criteria for eligibility for special education.

For students ages twelve to twenty-one, the district's trend over the past three years has been to place approximately fourteen percent of its special education population in outof-district private or public settings. While the statistic for this placement option has

remained stable, there has been a significant increase in the number of students being removed from the general education population at the Gateway Middle/High School for more than sixty percent of the day. During the 2000-2001 school year, 7.2% of classified students spent less than forty percent of their day with general education students and, during 2001-2002, this number reached 19.3%. In addition, the district has identified a need for more supplemental aids and services to support classified students in general education settings. The district has addressed these needs through their improvement plan.

#### Areas Demonstrating Compliance with All Standards:

**Reevaluation and Graduation** were determined by the district during self-assessment and confirmed by the Office of Special Education Programs during the on-site monitoring visit to be an area of compliance for the Gateway Regional School District.

## Section I: General Provisions

## Summary of Findings:

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

During the self-assessment process, the district identified concerns in the areas of inservice training for general education and special education staff, regarding differentiated and adapted instruction, strategies to address various disability issues, and classroom management strategies, as well as training for staff and parents regarding transition services and options. The district's improvement plan is sufficient to address this area of need. During the on-site visit, it was determined that the district has begun to implement its improvement plan to address the in-servicing of staff.

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

## Section II: Free, Appropriate Public Education (FAPE)

#### Summary of Findings:

During self-assessment the district accurately identified themselves compliant in the areas of length of school day and certification.

During the self-assessment process, the district identified concerns in the areas of facilities and hearing aids. The district's improvement plan is sufficient to address these areas. During the on-site visit, it was determined that the district has begun to implement its improvement plan to address these areas. With regard to the additional self-identified area of provision of programs and related services as affected by course and schedule changes over the summer, the district's improvement plan is insufficient because it lacks activities to remove the barriers and administrative oversight to ensure students receive the educational program and related services discussed by the IEP team and required by the IEP. The district will revise its plan to include these components. Also, with regard to the additional self-identified area of transfer students, the district's improvement plan is

insufficient because it lacks activities and an administrative oversight component to ensure the district provides an appropriate educational program and related services without undue delay. The district will revise its improvement plan to include these components.

Additional areas of need were identified during the on-site visit regarding extended school year, location and duration of related services, goals and objectives for students placed in out-of-district settings, and counseling goals and objectives.

## Area(s) of Need:

**Extended School Year** – During the on-site visit, a review of records and interviews with staff indicated the district does not consider extended school year services for every student determined eligible for special education and related services or eligible for speech and language services. In addition, for those students who are found in need of extended school year programming, IEPs do not include description of the services needed, goals and objectives, implementation dates, and frequency, duration and location of services. As a result, review of a student's IEP by a parent, case manager, teacher, related services provider or administrator would not provide a clear understanding of the service(s) required.

• The district will revise the improvement plan to include activities that ensure that extended school year is considered for every student with disabilities and is provided when warranted. In the event an extended program is required, the IEP must include a description of the program, goals and objectives and all other required components to ensure full implementation of the identified program and services. Implementation of these activities will ensure the district is appropriately addressing those factors that may lead to academic regression and recoupment issues. The improvement plan must include training and an administrative oversight component to ensure the consistent implementation of these activities.

**Location and Duration of Related Services** – During the on-site monitoring, interviews and record review indicated that the district does not consistently document the location and duration of related services. As a result it is unclear where and for how long the services are provided. In many IEPs, the location is left blank and/or duration is described "as needed."

 The district will revise the improvement plan to include activities to ensure the IEP team identifies specific durations and locations of all related service programs. Implementation of these activities will ensure the student receives the related services the IEP team has determined are necessary to derive full educational benefit from the student's educational program.

**Goals and Objectives for Students Placed in Out-of-District Settings** – During the on-site monitoring, record review and interviews with staff indicated that goals and objectives for students who are placed at out-of-district or separate public or private schools were not consistently included in those students' IEPs.

• The district will revise the improvement plan to include activities to ensure goals and objectives are developed and included in all IEPs, when required.

Implementation of these activities will ensure that measurable goals and benchmarks are included and permit a determination of the student's progress in the program. The plan must include an administrative oversight component to ensure consistent implementation of the activities.

**Counseling Goals and Objectives** – During the on-site monitoring, interviews and record review indicated that therapy goals and objectives were not consistently included in the IEPs of students requiring counseling.

• The district will revise the improvement plan to include activities to ensure goals and objectives for counseling as a related service are developed and included in IEPs. Implementation of these activities will ensure related services providers are aware of specific student needs and are able to determine progress in meeting therapy benchmarks. The plan must include an administrative oversight component to ensure consistent implementation of the activities.

## Section III: Procedural Safeguards

#### Summary of Findings:

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

During the self-assessment process, the district identified concerns in the areas of written notice timelines, notices in native language and interpreters. The district's improvement plan is sufficient to address these areas. During the on-site visit, it was determined that the district has begun to implement its improvement plan to address these areas. With regard to the additional self-identified area of consent, the district's improvement plan is insufficient because it fails to identify activities that include a mechanism to seek out due process or any other alternative means of obtaining consent, in order to avoid undue delay, when the evaluation process has been stopped by lack of parental participation. The district will revise its improvement plan to include these components, as well as administrative oversight.

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

#### Section IV: Location, Referral and Identification

#### Summary of Findings:

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

During the self-assessment process, the district identified concerns in the areas of Child Find 3-21, referral process, and pre-referral interventions. The district's improvement plan is sufficient to address these areas. During the on-site visit, it was determined that the district has begun to implement its improvement plan to address these areas.

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

## Section V: Protection in Evaluation and Evaluation Procedures

#### Summary of Findings:

During self-assessment the district accurately identified themselves compliant in the areas of standardized assessments and bilingual evaluations.

During the self-assessment process, the district identified concerns in the areas of multidisciplinary evaluations, particularly for speech and language evaluations, functional assessments, and documentation of acceptance or rejection of reports. The district's improvement plan is sufficient to address these areas. During the on-site visit, it was determined that the district has begun to implement its improvement plan to address these areas.

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

#### Area(s) of Need:

**Written Reports** – During the on-site monitoring, interviews and record review indicated that child study team members prepare a collaborative report which not only includes the findings of each individually administered assessment, but also criteria and rationale for eligibility. Further, this collaborative document does not include the signatures of the evaluators or the dates the reports were written.

• The district will revise the improvement plan to include activities to ensure that evaluators prepare a written report, with all required components, of the results of each assessment. At the discretion of the district, the written report may be prepared collaboratively by the evaluators or each evaluator may prepare an individually written report. The individual(s) who conducted the assessment(s) shall date and sign the report. The district will remove eligibility determination statements from the written report. Implementation of these activities will ensure that eligibility determinations are made by all members of the eligibility team not just by those who assessed the student. The plan must include an administrative oversight component to ensure consistent implementation of the activities.

#### Section VII: Eligibility

#### Summary of Findings:

During self-assessment the district accurately identified themselves compliant in the areas of eligibility meetings, participants, and statement of eligibility.

During the self-assessment process, the district identified concerns in the areas of eligibility criteria, specifically for the category of autistic, signatures of agreement or disagreement, and copy of evaluation reports to parents. The district's improvement

plan is sufficient to address these areas. During the on-site visit, it was determined that the district has begun to implement its improvement plan to address these areas.

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

#### Section VIII: Individualized Education Program (IEP)

#### Summary of Findings:

During self-assessment the district accurately identified themselves compliant in the areas of IEP meetings, considerations and required statements, present levels of educational performance, age of majority, and provision of IEP to parent.

During the self-assessment process, the district identified concerns in the areas of IEPs as written notice/timelines, IEPs being in effect at the start of the school year for all students with disabilities, teacher access and knowledge, and 90-day timelines. The district's improvement plan is sufficient to address these areas. During the on-site visit, it was determined that the district has begun to implement its improvement plan to address these areas.

An additional area of need was identified during the on-site visit regarding general education teacher participation at the annual review.

#### Area(s) of Need:

**General Education Teacher Participation at the Annual Review** – During the on-site monitoring, interviews and record review indicated that general education teachers are not always in attendance at annual review meetings.

 The district will revise the improvement plan to include activities to ensure that general education teachers are attending IEP team meetings. Implementation of these activities will ensure required individuals will be in attendance to discuss programming and services issues and to participate in the decision-making process. The plan must include an administrative oversight component to ensure consistent implementation of the activities.

#### Section IX: Least Restrictive Environment (LRE)

#### Summary of Findings:

During the self-assessment process, the district identified concerns in the areas of decision-making process, Oberti, considerations and documentation, supplemental aids and services, general education access, and continuum of programs. The district's improvement plan is sufficient to address these areas of need.

An additional area of need was identified during the on-site monitoring visit regarding notification to out-of-district students with disabilities of the availability of nonacademic and extracurricular activities within the district.

## Area(s) of Need:

**Nonacademic/Extracurricular Activities for Out-of-District Students** – During the on-site monitoring, record review and interviews with building principals and child study team members indicated that the district does not have procedures to notify out-of-district students of the opportunities to participate in nonacademic and extracurricular activities within the district.

 The district will revise the improvement plan to include activities to ensure that students with disabilities in out-of-district placements are notified of nonacademic and extracurricular activities within the district. Implementation of these activities will ensure students in out-of-district placements are provided with the opportunity to participate in nonacademic and extracurricular activities with their nondisabled peers who attend in-district programs. The plan must include an administrative oversight component to ensure consistent implementation of the activities.

## Section X: Transition to Preschool

#### Summary of Findings:

The Gateway Regional School District services students from seventh grade to twelfth grade and is not required to address issues of preschool transition.

#### Section X: Transition to Post-School

#### Summary of Findings:

During the self-assessment process, the district identified concerns in the areas of age fourteen transition service needs, student interests, surveys and assessments, and student/agency invite. The district's improvement plan is sufficient to address these areas of need. During the on-site visit, it was determined that the district has begun to implement its improvement plan to address these areas.

Additional areas of need were identified during the on-site visit regarding documentation of courses of study and age 16 needed transition services.

#### Area(s) of Need:

**Courses of Study** – During the on-site monitoring, interviews and record review indicated that the district is not including courses of study relevant to the transition service needs under the applicable parts of the student's IEP.

• The district will revise the improvement plan to include activities to ensure that a statement of the transition services needs includes consideration and documentation of appropriate courses of study, relevant to the student's interests/preferences and functioning. Implementation of these activities will ensure that proposed courses of study afford the student the opportunity to achieve successful post-secondary outcomes. The plan

# must include an administrative oversight component to ensure consistent implementation of the activities.

Age 16 Needed Transition Services – During the on-site monitoring, a review of records and interviews with staff indicated that IEPs of students who are at least sixteen years of age do not consistently contain an appropriately developed transition plan, with required components. In some IEPs, sections of the transition form used by the district were left blank or the form itself was not included.

• The district will revise the improvement plan to include activities to ensure that transition plans are developed appropriately and consistently. Implementation of these activities will ensure plans are developed to afford students the opportunity to achieve their post-secondary outcomes. The plan must also include an administrative oversight component to ensure the consistent implementation of the activities.

## Section XI: Discipline

## Summary of Findings:

During self-assessment the district accurately identified themselves compliant in the areas of procedural safeguards for potentially disabled students, suspension tracking, interim alternative educational setting, and manifestation determination.

During the self-assessment process, the district identified concerns in the areas of documentation to case manager, functional behavioral assessments/behavioral intervention plans, and copies of special education and disciplinary records transmitted to appropriate authorities. The district's improvement plan is sufficient to address these areas of need. During the on-site visit, it was determined that the district has begun to implement its improvement plan to address these areas. With regard to the additional self-identified area of convening an IEP team meeting for removals of ten days or more, the district's improvement plan is insufficient because, although it addresses improving communication with and written notification to case managers, it lacks any procedure for reconvening a meeting of the IEP team to review existing behavioral interventions in the IEP or, in the case of a student without a behavioral intervention plan, to develop an assessment plan and conduct a functional behavioral assessment. Implementation of these activities would ensure students with disabilities are provided appropriate educational services. The district will revise its improvement plan to include these components, as well as administrative oversight.

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

#### Section XII: Statewide Assessment

#### Summary of Findings:

During self-assessment the district accurately identified themselves compliant in the areas of IEP documentation/accommodations and modifications, and the process for exemption from passing.

During the self-assessment process, the district identified concerns in the area of the Special Review Assessment process. The district's improvement plan is sufficient to address this area of need. During the on-site visit, it was determined that the district has begun to implement its improvement plan to address this area.

An additional area of need was identified during the on-site visit regarding alternate proficiency assessment.

#### Area(s) of Need:

**Alternate Proficiency Assessment** (APA) – During the on-site monitoring, a review of records indicated that, for students with disabilities who were determined to require an alternative to the Statewide assessment system, no further description of the assessment was provided in the IEP. Further, staff interviews indicated the need for training in APA.

• The district will revise the improvement plan to include activities to ensure the determination and provision of alternative assessments for students and the inservicing of staff regarding alternative proficiency assessment. Implementation will ensure that when the nature of a student's disability is so severe that the student is not receiving instruction in any of the knowledge and skills measured by the general Statewide assessment and the student cannot complete any of the types of questions on the assessment in the content area(s) even with accommodations and modifications, the student shall participate in the Alternative Proficiency Assessment.

## Section XIV: Programs and Services

#### Summary of Findings:

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

During the self-assessment process, the district identified concerns in the areas of classsize for resource center classes, personnel (additional CST staff), common planning time, and transportation coordinator. The district's improvement plan is sufficient to address these areas of need. During the on-site visit, it was determined that the district has begun to implement its improvement plan to address these areas.

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

#### Section XV: Student Records

#### Summary of Findings:

During self-assessment the district accurately identified themselves compliant in the areas of access sheets, maintenance and destruction of records, and location of other records.

During the self-assessment process, the district identified concerns in the area of parent and adult-student access to records. The district's improvement plan is sufficient to address this area of need. During the on-site visit, it was determined that the district has begun to implement its improvement plan to address this area.

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

#### Summary

On-site special education monitoring was conducted in the **Gateway Regional School District** on October 14, 15 and 16, 2003. The purpose of the monitoring visit was to verify the district's report of findings resulting from their self-assessment and to review the district's improvement plan. The district is commended for the comprehensive review it conducted during the self-assessment process. As a result of that review, the district was able to identify most areas of need and develop an improvement plan that, with some revision, will bring about systemic change and for the implementation of activities to bring about change in those identified areas. 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.

Reevaluation and Graduation were sections demonstrating compliance with all standards.

Though a significant number of students are entering Gateway classrooms already classified, upon reevaluation, the district continues to find nearly all students eligible for programming and services. Further review of data indicated stable frequency of placements of classified students in out-of-district settings but an increasing trend of indistrict students in placements where time spent with general education students is less than forty percent. The district has addressed these needs through their improvement plan.

At a public focus group meeting held prior to the monitoring visit, parents expressed their satisfaction with the district's exceptional programs and services, the academically challenging courses and instruction, the devoted and available teaching staff, the accessibility to and professionalism of the child study team, and the use of assistive technology throughout the school. Parents noted that special education timelines are maintained, meetings are conducted when necessary and with all required and needed personnel, IEP documents are kept current, and the range of programming options is adequate. Parents commented that it is a smooth and supportive process for students who transition into the district for seventh grade, as well as for those students who graduate and move on to some post-secondary experience. Concerns were raised regarding the absence of a parent support group and the lack of any parent workshops offered within the district. Some parents commented that in-class support teachers occasionally do not have knowledge of the content areas that are being taught. Further, parents agreed that the selection of some in-class support teachers has not always proven beneficial or a "good match" for working with identified students.

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 IDEA information, length of school day, certification, surrogate parents, notice of meeting, meetings, independent evaluations, direct referrals, summer referrals, health summary, vision and hearing screenings, identification meeting participants, standardized assessments, bilingual evaluations, eligibility meetings and participants, statement of eligibility, IEP meetings, consideration and required IEP statements, present levels of educational performance, age pf majority, provision of IEP to parent, procedural safeguards for potentially disabled students, suspension tracking, interim alternative educational setting, manifestation determination, statewide assessment documentation/accommodations and modifications, process for exemption from passing,

age range, group sizes for speech, home instruction, access sheets, maintenance and destruction of records, and location of other records.

During the self-assessment process, the district identified areas of need regarding inserve training for professional and paraprofessional staff and parents, facilities, hearing aids, provision of programs and related services, transfer students, written notice timelines, notices in native language, interpreters at meetings, consent, Child Find 3-21, referral process, pre-referral interventions, multidisciplinary evaluations, functional assessments, documentation of acceptance or rejection of reports, eligibility criteria, signatures of agreement or disagreement, copy of evaluation report to parent, IEPs as written notice/timelines, IEPs being in effect at the start of the school year, teacher and knowledge, 90-day timelines, decision-making process, Oberti, access considerations and documentation, supplemental aids and services, general education access, continuum of programs, age fourteen transition service needs, student interests, surveys and assessments, student/agency invite, documentation to case manager, functional behavioral assessments, behavioral intervention plans, copies of special education and disciplinary records to appropriate authorities when a crime has been committed, convening an IEP team meeting for removals of ten days or more, Special Review Assessment, class-size for resource center classes, personnel, common planning time, transportation coordinator, and parent and adult-student access to records.

The on-site visit identified additional areas of need within the various standards regarding extended school year, location and duration of related services, goals and objectives for students placed in out-of-district settings, counseling goals and objectives, written reports, general education teacher participation at annual review meetings, nonacademic/extracurricular activities for out-of-district students, transition planning/courses of study, age 16 needed transition services plan, and alternative proficiency assessment.

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