**District**: Glassboro School District County: Gloucester

Monitoring Dates: February 18, 19, and 20, 2004

**Monitoring Team:** Caryl Carthew, Julia Harmelin, Jane Marano, and Ken Richards

#### Background Information:

During the 2002–2003 school year, the Glassboro School District conducted a self-assessment of policies, procedures, programs, services, and student outcomes. This self-assessment component of the monitoring process provided the Glassboro 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 Glassboro 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 Bullock School on January 14, 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 administrators, building principals, general education and special education teachers, speech therapists and child study team members.

#### **District Strengths:**

The district is commended for providing a number of innovative programs designed to enhance student academic achievement, including the Genesis Program which is operated in a local housing project and provides early stimulation and teaching of readiness skills for at-risk preschoolers. In addition, the district offers an after-school remedial program at Bullock School and a Basic Skills summer program for students in

grades one through six. The district has also implemented several student recognition programs, including the Renaissance program at the Bowe School and the High School which recognizes academic achievement, attendance and behavior, and Winner's Circle at the Intermediate School, which is a reading incentive program.

The district is also commended for its efforts to expand collaborative relationships with Rowan University. Students at the high school can take advantage of Rowan's "open-seat" policy for college level courses. In addition, students broadcast a program from the university's radio station. The district has also implemented the Professional Development School, which has been funded, in part, by Temple University. Staff members from Rowan provide workshops as well as course work for staff members within the district.

The district has received funding through the Local Capacity Building Grant from the NJDOE. Funds from this grant have enabled the district to hire an inclusion facilitator, provide in-service training, purchase assistive technology, hire reading consultants, and increase the number of students placed in less restrictive settings.

The district has developed several innovative programs for students in the Behavior Disabilities program. At the middle school level, students provide lunches for staff members and the district-wide student recognition program. At the high school level, the students assist with landscaping projects, cut and sell wood, and assist with the district print shop.

#### Part One Data Summary:

The data submitted by the Glassboro School District as a result of the self-assessment process has identified areas of concern regarding placement in the least restrictive environment. Data submitted by the district indicated that placement of preschool disabled students in general education early childhood settings is at 12%, which is below the state average of 23.2%. Placement of school-aged students in general education > 80% of the day continues to be below the state average. However the district trend over the last three years has increased from 27.8% to 38.1%, an increase of 10.3%. The district indicated that this positive trend results from activities implemented through the Capacity Building Grant. Classification rate is also approximately 6 percentage points above the state average. Each of these concerns has been addressed through the district's improvement plan.

#### Areas Demonstrating Compliance With All Standards:

**Statewide Assessment** and **Graduation** 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 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 paraprofessional training and procedures for determining the effectiveness of staff development efforts. The district's improvement plan is sufficient to address these issues.

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

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

#### **Summary of Findings:**

During self-assessment the district accurately identified themselves compliant in the areas of related services (other than counseling), adaptive PE, length of school day/year, and certification.

During the self-assessment process, the district identified concerns in the areas of procedures for maintaining hearing aids, procedures for reviewing records of transfer students, and accessibility of facilities. The district's improvement plan is sufficient to address these issues.

Additional areas of need were identified during the on-site visit regarding extended school year and counseling.

#### Area(s) of Need:

**Extended School Year -** During the on-site monitoring it was determined that the need for extended school year is not consistently considered and documented for all students, particularly those at the middle and high school levels.

 The district will revise its improvement plan to include activities to ensure that ESY is considered for all students and provided when appropriate. Implementation of these activities will ensure any issues related to regression and recoupment are effectively addressed during the extended school year program.

**Counseling -** During the on-site monitoring it was determined that there is a need for additional counseling as a related service for classified students. Interviews with school personnel indicate staffing is a barrier to compliance. Also, at the high school level, testing schedules impact on the availability of guidance personnel. In addition, students at the Elsmere program, a self-contained program for students with behavior concerns, are not consistently receiving the counseling services required by their IEPs.

• The district will revise its improvement plan to include activities to ensure that counseling as a related service is considered for students on an individualized basis and provided as required by the IEP. The implementation of these activities will result in students receiving the counseling services necessary to receive maximum educational benefit from their program. The improvement plan must include an administrative oversight component to ensure consistent implementation of the plan.

Section III: Procedural Safeguards

## **Summary of Findings:**

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

During the self-assessment process, the district identified concerns in the area of procedures for provision of written notice. The district's improvement plan is sufficient to address this issue.

An additional area of need was identified during the on-site visit regarding native language.

#### Area(s) of Need:

**Native Language -** During the on-site monitoring it was determined that although parents receive meeting invitations in their native language, written notice of the decisions made at those meetings is not consistently translated.

• The district will revise its improvement plan to include activities to ensure that written notice is provided in the parent's native language, when feasible. The implementation of these activities will result in parents, whose primary language is not English, having the opportunity to fully participate in program planning as well as having a complete understanding of any decisions made by the IEP team. The improvement plan must include an administrative oversight component to ensure consistent implementation of the plan.

## Section IV: Location, Referral and Identification

#### **Summary of Findings:**

During self-assessment the district accurately identified themselves compliant in the areas of Child Find, direct referrals, and summer referrals.

During the self-assessment process, the district identified concerns in the areas of referral procedures, pre-referral intervention activities, health summaries and vision/hearing screenings, and identification meeting participants. The district's improvement plan is sufficient to address these issues. The district further identified concerns regarding identification meeting timelines. On-site monitoring activities determined that the district has implemented activities to bring about correction in this area. The district also identified concerns regarding the overrepresentation of minority students in special education. The district will continue to receive technical assistance from the Office of Special Education Programs and the Office for Civil Rights regarding improvement plan activities.

No additional areas of need were identified during the on-site 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 use of standardized assessments, components of functional assessments for child study team evaluations, written reports, and bilingual evaluations.

During the self-assessment process, the district identified concerns in the area of documentation of acceptance and/or rejection of reports. The district's improvement plan is sufficient to address this issue.

Additional areas of need were identified during the on-site visit regarding multidisciplinary evaluations for preschool and functional assessments for speech-language evaluations.

#### Area(s) of Need:

**Multi-disciplinary Evaluations (Preschool) -** During the on-site monitoring it was determined that preschool initial evaluations do not include the minimum number of child study team assessments. The district is considering the speech-language assessment as one of the two minimum required, when in fact it must be considered an additional assessment.

 The district will revise its improvement plan to include activities to ensure that a minimum of two child study team assessments are conducted for preschool initial evaluations. The implementation of these activities will result in appropriate assessments being conducted to determine eligibility for special education and related services. The improvement plan must include an administrative oversight component to ensure consistent implementation of the plan.

**Functional Assessments for Speech-Language -** During the on-site monitoring it was determined that speech language assessments do not include all the required components of a functional assessment. Although evaluation reports indicate that parent and teacher interviews will be conducted, findings from those interviews are not referenced in the evaluation reports.

 The district will revise its improvement plan to include activities to ensure that speech-language evaluation reports include all the required components of a functional assessment. The implementation of these activities will ensure that all relevant data regarding parent and teacher concerns is included in the evaluation process. The improvement plan must include an administrative oversight component to ensure consistent implementation of the plan.

Section VI: Reevaluation

## **Summary of Finding:**

During self-assessment the district accurately identified themselves compliant in the areas of reevaluation timelines, planning meetings and participants, and reevaluations for students turning age five.

An area of need was identified during the on-site visit regarding conducting assessments without undue delay once parental consent has been obtained.

## Area(s) of Need:

**Undue Delay -** During the on-site monitoring it was determined that the district is not implementing reevaluation plans in a timely manner once parental consent has been obtained. Although reevaluations are completed by the three-year due date, evaluation planning meetings may be conducted as early as seven to twelve months prior to the due date. As a result the assessments are conducted well after parental consent is obtained and the evaluation plans have not considered any interim change in the student's level of functioning.

• The district will revise its improvement plan to include activities to ensure that reevaluation plans are implemented without undue delay once parental consent has been obtained. Implementation of these activities will ensure that the assessments conducted are relevant to the student's current educational program and level of functioning. The improvement plan must include an administrative oversight component to ensure consistent implementation of the plan.

Section VII: Eligibility

#### **Summary of Findings:**

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

During the self-assessment process, the district identified concerns in the areas of eligibility meeting participants and provision of evaluation reports to parents. The district's improvement plan is sufficient to address these issues.

An additional area of need was identified during the on-site visit regarding signatures of agreement/disagreement.

#### Area(s) of Need:

**Signatures of Agreement/Disagreement -** During the on-site monitoring it was determined that teachers are not consistently signing agreement or disagreement with the eligibility determination. Although the eligibility format has a space for their signature under the category of "other", meeting documentation does not consistently include the signature of teachers in attendance at the meeting. In addition, not all teachers interviewed were aware of this requirement.

 The district will revise its improvement plan to include activities to ensure that all members of the IEP team sign agreement or disagreement with the eligibility determinations. Implementation of these activities will ensure that parents are fully informed of differing opinions regarding eligibility determinations. The improvement plan must include an administrative oversight component to ensure consistent implementation of the plan.

Section VIII: Individualized Education Program (IEP)

## **Summary of Findings:**

During self-assessment the district accurately identified themselves compliant in the areas of IEP components, IEP goals and objectives, IEP implementation dates, age of majority, annual review timelines, 90-day timelines, and teacher knowledge/access to IEPs.

During the self-assessment process, the district identified concerns in the areas of IEP meeting participants and provision of a copy of the IEP to parents prior to implementation. The district's improvement plan is sufficient to address these issues.

An additional area of need was identified during the on-site visit regarding procedures for revising IEPs.

## Area(s) of Need:

**Revising IEPs -** During the on-site monitoring it was determined that the district is not consistently reconvening an IEP meeting when program revisions are necessary. In some instances, contact is made to the parent and revisions are forwarded without holding a meeting. At the high school level, schedules of classes/subjects do not consistently match IEPs because changes are made to them without holding a meeting. In addition, when the IEP team does make revisions to the IEP, written notice does not consistently include all the elements of written notice. In some instances, the entire IEP is provided, but on other occasions, only the revised portions are provided. In those situations, notice does not include all the required elements.

• The district will revise its improvement plan to include activities to ensure that an IEP meeting is convened when changes to programs and/or services are required and that written notice is provided to the parent which includes all the required elements. Implementation of these activities will ensure that all required members of the IEP team are aware of any proposed changes to the IEP and that parents are fully informed as to the decisions made. The plan must include an administrative oversight component to ensure consistent implementation of the plan.

## Section IX: Least Restrictive Environment (LRE)

## **Summary of Findings:**

During self-assessment the district accurately identified themselves compliant in the areas of Oberti considerations, provision of supplemental aids and services, participation in nonacademic and extracurricular activities, and access to regular education programs.

During the self-assessment process, the district identified concerns in the area of continuum of options and individualized decision-making for preschool and school-aged students. Barriers to compliance include funding, space constraints, lack of collaborative relationships with area preschools and need for staff development. The district's improvement plan is sufficient to address these issues.

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

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

#### **Summary of Findings:**

During self-assessment the district accurately identified themselves compliant in the areas of student and agency invitations, statement of transition services needs, and statement of needed transition services.

During the self-assessment process, the district identified concerns in the areas of procedures for conducting individual assessments, agency participation at transition meetings, establishing partnerships with community resources, and monitoring the implementation of transition services provided by outside agencies. The district's improvement plan is sufficient to address these issues.

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

#### Section X: Transition to Preschool

#### **Summary of Findings:**

During self-assessment the district accurately identified themselves compliant in the areas of preschool transition planning conferences and implementation of IEPs by age three.

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

Section XI: Discipline

## **Summary of Findings:**

During self-assessment the district accurately identified themselves compliant in the areas of suspension tracking and procedures for placement in interim alternative education settings.

During the self-assessment process, the district identified concerns in the areas of procedural safeguards for students identified as potentially disabled, notification of removals to case managers, convening an IEP meeting for removals of ten or more days, functional behavioral assessments, procedures for short-term and long-term removals, and procedures for transmitting copies of records when crimes are reported to authorities. The district's improvement plan is sufficient to address these issues.

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

# Section XIV: Programs and Services

#### **Summary of Findings:**

During self-assessment the district accurately identified themselves compliant in the areas of class size and age range, group size for speech therapy, homebound instruction, and common planning time.

During the self-assessment process, the district identified concerns in the area of descriptions of special class programs. The district's improvement plan is sufficient to address this issue.

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

#### Section XV: Student Records

#### **Summary of Findings:**

During self-assessment the district accurately identified themselves compliant in the areas of parents/adult student access to records, records of access for child study team files, and documentation of locations of pupil records.

During the self-assessment process, the district identified concerns in the areas of procedures for maintenance and destruction of pupil records and staff knowledge of records procedures. The district's improvement plan is sufficient to address these issues.

An additional area of need was identified during the on-site visit regarding documentation of access to speech-language files.

## Area(s) of Need:

**Speech-Language Records Access -** During the on-site monitoring it was determined that the district does not maintain a record of access for speech-language confidential records.

 The district will revise its improvement plan to include activities to ensure that access to speech-language files is documented. Implementation of these activities will ensure that an accurate record will be maintained of all persons having access to a student's record. The improvement plan must include an administrative oversight component to ensure consistent implementation of the plan.

## Summary

On-site special education monitoring was conducted in the Glassboro School District on February 18, 19, and 20, 2004. The purpose of the monitoring visit was to verify the district's report of findings resulting from their self-assessment and to review the district's improvement plan. The district is commended for the exceptionally comprehensive review conducted during the self-assessment process. As a result of that review the district was able to identify nearly all areas of need and develop an improvement plan that with minor revisions 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 as compliant with federal and state statutes and regulations.

A review of data indicated that the district has increased the number of students placed in regular education over the past three years and attributes this, in part, to the programs instituted through the Capacity Building Grant. Despite the positive trend, the percentage of students in regular education more than 80% of the day continues to be below the state average. In addition the classification rate is above the state average. Each of these concerns has been addressed through ongoing activities in the district's improvement plan.

At a focus group meeting held prior to the monitoring visit, parents expressed their satisfaction with many of the district's programs and services. They also expressed concerns regarding IEP development and individualized decision-making, extended school year, transition, and staffing issues. Many of the issues addressed during the focus group meeting have been addressed in the district's improvement plan.

Standards identified as consistently compliant by the district during self-assessment and verified during the on-site monitoring visit included Statewide Assessment and Graduation.

Areas identified as consistently compliant by the district during self-assessment and verified during the on-site monitoring visit included special education policies and procedures, dissemination of IDEA information, provision of related services (other than counseling), length of school day/year, certification, surrogate parents, consent, independent evaluations, notice of a meeting, Child Find, referral procedures, evaluations, eligibility determination, IEP development, IEP documentation, age of majority, timelines for annual reviews, initial evaluations, and reevaluations, access to regular education, participation in nonacademic and extracurricular activities, continuum of services for school-aged students, preschool transition, procedures for tracking student suspensions, and provision of programs and services.

An area of need originally identified by the district but determined to have been corrected prior to the on-site monitoring visit by the NJDOE is the timeline for conducting identification meetings.

During the self-assessment process, the district identified areas of need regarding staff development, maintenance of hearing aids, transfer procedures, facilities, written notice, referral procedures, pre-referral interventions, health summaries, vision/hearing screenings, overrepresentation of minority students, documentation of acceptance and rejection of reports, meeting participants, continuum of options and individualized decision-making for preschool and school-aged students, conducting individual assessments related to transition planning, agency involvement in transition services,

discipline, descriptions of special class programs, and procedures for maintenance and destruction of pupil records.

The on-site visit identified additional areas of need within the various standards regarding extended school year, counseling, native language, multi-disciplinary evaluations for preschool, functional assessments for speech evaluations, undue delay for reevaluations, signatures of agreement/disagreement, revisions to IEPs, and documentation of access to speech-language records.

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