

New Jersey State Department of Education Special Education Monitoring

District: Gloucester Township

County: Camden

Monitoring Dates: October 30, 31, Nov.1,2,& 3, 2000

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Background Information

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

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

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

The Office of Special Education Programs conducted an on-site monitoring visit to verify the self-assessment findings, determine the appropriateness of the improvement plan, and determine the progress in implementing the plan.

As the first step in the on-site monitoring process, the NJDOE held a focus group meeting for parents and community members at the C.W. Lewis School on October 24, 2000. 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, and child study team members.

District Strengths

During the on-site monitoring, several unique programs were identified that were beneficial to special education students throughout the district. Project Active is designed to prepare students to become contributing and participating members of their adult community. Although academics are emphasized, the program includes strong parental involvement and clinical support. Students acquire a more positive image through a greater sense of self-esteem while developing more effective methods of self-control. Most importantly, students are taught the necessary skills to assess various situations they may encounter, and learn how to respond more appropriately to these situations. As a result, these students learn how to make better choices.

Based on data obtained and analyzed during the self-assessment process and reviewed by OSEP, it was determined that approximately 98% of students with disabilities participated in the GEPA.

Areas Demonstrating Compliance With All Standards

Graduation was determined to be an area of compliance by the district during self-assessment and by the Office of Special Education Programs during the on-site visit.

I. General Provisions

Summary of Findings:

The district accurately assessed compliance in the areas of Policy and Procedures. The required Statement of Assurances has been submitted to the county office and procedures are being prepared for DOE approval.

During the self-assessment process, the district identified areas of need regarding staff development in scheduling techniques, child study team knowledge of standardized /statewide evaluations, assessments, and transition. The district also identified the need to increase parental participation and to create additional in-district elementary placements for the emotionally disturbed student population. The district's improvement plan does not sufficiently address most of these areas of need.

Areas of Need:

Staff Development - The district and on-site monitoring identified the need for ongoing staff development in the areas of transition, scheduling, inclusion and training in Core Curriculum Content Standards, and assessments.

- The district is directed to revise its improvement plan to address staff development needs in the areas identified by the district and as a result of on-site monitoring. The plan should identify follow-up activities to assess effectiveness and implementation of strategies and techniques presented during training.

Parental Participation - The district identified a need to increase parent participation in special education planning processes. Areas of need included the sharing of information regarding assessments, learning styles, transition, and IEP development.

- The district is directed to revise its improvement plan to include procedures to more effectively disseminate information to parents to afford them the opportunity to participate more actively in planning processes.

II. Free and Appropriate Education

Summary of Findings:

The district accurately assessed compliance in the areas of length of the school day, length of the school year, and provision of goals and objectives for related services.

During the self-assessment process, the district identified concerns with the documentation of the determination of need for extended school year services. In addition, the district indicated that principals need to better understand the process for reviewing IEPs for transfer students. The district's improvement plan is not sufficient to address these areas of need.

Additional areas of need were identified during the on-site monitoring visit regarding related services and the use of resource teachers for staff coverage needs.

Areas of Need:

Extended School Year – The district has indicated that consideration and discussion for extended school year is not consistently documented in the IEP. Although the district identified this as an area of need, the improvement plan does not address this component. During the on-site monitoring, staff members and parents indicated that the discussion and consideration of the need for ESY services does not consistently occur for all students. The discussion takes place primarily for students in out-of-district and self-contained programs.

- The district is directed to revise its improvement plan to ensure that extended school year services are considered and discussed for all students and that documentation of this discussion is maintained in student records.

Transfer Process – During the self-assessment process, the district identified a need for building administrators and middle school guidance personnel to be trained in the

IEP review process for students transferring into the district. A review of this plan indicates that the district intends to provide in-service opportunities for these individuals. This is insufficient to address this area of need.

- The district is directed to revise its improvement plan to ensure district staff, including building administrators and middle school guidance counselors, are provided with the necessary procedures to ensure these procedures are appropriately implemented when a student with a disability transfers into the district. The plan should include follow-up activities to verify compliance.

Related Services—Speech-Language – During the on-site monitoring, a review of student records and interviews with staff indicated that speech-language services begin in October and end in May. Interviews indicated that this delay is in response to administrative issues such as the need for speech-language specialists to assess students at the beginning and the end of the school year.

- The district is directed to revise its improvement plan to ensure that speech-language services are provided in accordance with the implementation dates identified in student IEPs. Should time be required at the beginning and end of the school year, implementation dates should be reflective of those needs and parents should be afforded the opportunity to discuss those dates as part of the IEP process.

Related Services—Counseling – During the on-site monitoring, interviews with staff members indicated that the decision-making process for the level of counseling services provided to classified students is not consistently based on individual student need. Through interviews, it was reported that the decision regarding the amount of counseling services is often based on the availability of counselors, particularly in buildings where the counseling staff is part-time.

- The district is directed to revise its improvement plan to ensure that the provision of counseling services is based on the individual needs of students and not determined by the availability of staff. The plan must include a component to ensure the district has sufficient staff to provide those services.

Resource Teachers – On-site monitoring determined that resource teachers are used to fill staff vacancies created by absenteeism and attendance at school related activities.

- The district is directed to revise its improvement plan to ensure the district has procedures in place to fill vacancies created by staff absenteeism. These procedures must not include the inappropriate use of teachers who are scheduled to provide services to other students.

III. Procedural Safeguards

Summary of Findings:

The district accurately accessed compliance in the areas of surrogate parents, providing parents with copies of N.J.A.C. 6A:14 and PRISE, providing independent evaluations when requested, and ensuring that procedures for native language are in place, if needed.

During the self-assessment process, the district identified concerns with the components of notice, documentation of transition components, and the invitation of the student to the meeting. The district has developed an improvement plan that does not sufficiently address these areas of need.

Additional areas of need were identified during the on-site monitoring visit regarding timelines, written notice of IEP revisions, required components, evaluations, purpose of meetings, documenting attempts to secure parent participation, SPSS, transfer of rights and due process hearing rules.

Areas of Need:

Transfer of Rights – The district’s IEP does not address Transfer of Rights for students three years before the student turns 18.

- 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.

Due Process Hearing Rules – The district was unable provide the monitors with a copy of N.J.A.C. 1:6A (due process hearing rules). Interviews confirm these rules are not provided to parents when required.

- The district is directed to revise its improvement plan to ensure that parents are provided a copy of N.J.A.C. 1:6A when required or upon request.

Notice Forms– A review of the notice regarding the nature and scope of the evaluation does not consistently include the explanation for the proposed action. Notices of meeting do not consistently identify the purpose of the meeting. Written notice of IEP revisions were not consistently maintained in student files. A further review of notice forms indicates the district does not include a copy of the Short Procedural Safeguards Statement or PRISE.

- The district is directed to revise its improvement plan to ensure that notice forms contain all required components. It is recommended the district adopt the notice letters developed by the Office of Special Education Programs.

- The district is directed to revise its improvement plan to ensure notice is provided subsequent to IEP revisions and that a copy of that notice is maintained in the student file.

15-day Timelines for written notice – A review of records indicated the district was unable to demonstrate the provision of notice within 15 days of the IEP meeting or the provision of a copy of the IEP prior to its implementation.

- The district is directed to revise its improvement plan to ensure that the district provides parents with a copy of the IEP prior to its implementation as well as complies with the 15-day timeline for the provision of written notice. The plan must include a mechanism to document these actions.

Parent Participation – A review of records indicated the district is not consistently documenting its attempts to ensure parental participation at meetings.

- The district is directed to revise its improvement plan to ensure the consistent documentation of its attempts to afford parents their rights to participate at IEP meetings.

IV. Location, Referral, and Identification

Summary of Findings:

The district accurately assessed compliance in the areas of Child Find for preschool students, direct referral process, and convening a meeting within 20-days of receipt of a referral.

During the self-assessment process, the district identified areas of need regarding timelines for evaluating the effectiveness of pre-referral interventions, vision and hearing screenings, and medical screening information for preschool referrals. The district's improvement plan is not sufficient to address these areas of need.

Additional areas of need were identified during the on-site monitoring regarding documentation of pre-referral interventions, and Child Find procedures for school-aged students.

Areas of Need:

Pre-referral Interventions –During the self-assessment process, the district identified a need to establish timelines for evaluating the effectiveness of interventions and for determining when to proceed to a child study team referral. District staff members indicated that because there are no established timelines, some children remain in the PAC process in spite of the fact that PAC interventions have not proven to be effective. In addition, during the on-site visit, a review of initial referrals indicated that pre-referral

interventions and the effectiveness of those interventions are inconsistently documented in student records.

- The district is directed to revise its improvement plan to ensure that when a referral is made to PAC, pre-referral interventions are evaluated for effectiveness and are consistently documented in student records. The procedures must include a mechanism to ensure staff members refer the student to the CST when appropriate.

Vision and Hearing Screenings –During the self-assessment process, the district indicated that vision and hearing screenings are not conducted at the time of referral or documented in student records. Additionally, the district indicated that medical screenings are not consistently conducted prior to the identification meeting for preschool students. The district’s improvement plan indicates that early intervention programs (EIP) or family physicians provide this information in most cases.

- The district is directed to revise its improvement plan to ensure that hearing and vision screenings are conducted when students are referred for child study team evaluations.
- The district is directed to revise its improvement plan to ensure that medical screening information is obtained at the time of the initial referral for preschool students in the event that information is not provided by staff from the EIP or from the student’s personal physician.

Child Find for School-Aged Students –At the time of the on-site monitoring visit the district’s procedures for Child Find were reviewed. While activities for preschool students were appropriate, the method for informing parents of school-aged students of the procedures for accessing child study team services was inconsistently applied.

- The district is directed to revise its improvement plan to include procedures that will ensure parents of school-aged students are informed of the procedures for accessing child study team and special education services.

V. Protection in Evaluation and Evaluation Procedures

Summary of Findings:

The district accurately assessed compliance in the provision of evaluation procedures. Appropriately trained personnel administer evaluations that are technically sound and neither culturally nor racially discriminatory. The district ensures that students receive evaluations conducted by a multi-disciplinary team of professionals who utilize a variety of assessments. Acceptance or rejection of reports are noted in writing and provided to the parents. The district has provisions in place to administer evaluations and other identified assessments in the student/parent native language if need is identified.

During the self assessment process, the district identified areas of need regarding initial evaluation timelines during the summer months, a lack of consistency in documenting the relationship between behavior and academic performance in written reports, overrepresentation of minorities in special education, and an inconsistency in utilizing functional assessments during the evaluation process.

Additional areas of need were identified during on-site monitoring regarding initial referrals during the winter and late spring.

Areas of Need:

Initial Evaluation Timelines – The district indicated difficulty in securing staff to conduct initial evaluations during the summer. During the on-site visit it was also determined that initial referral timelines were non-compliant during the winter months and late spring.

- The district is directed to revise its improvement plan to ensure that timelines are met on a consistent basis throughout the school year. The plan must include a mechanism to ensure the district has sufficient staff to meet these evaluation timelines.

Documenting the Relationship Between Behavior and Academic Performance - A review of written evaluation reports indicated the district is not including a statement regarding the relevant behavior of the student, either reported or observed, and the relationship of that behavior to the student's academic performance is not consistently documented.

- The district is directed to revise its improvement plan to ensure the documentation of the relationship between a student's behavior and academic performance in written reports.

Functional Assessments – the district indicated that during the evaluation process, functional assessments are inconsistently conducted.

- The district is directed to revise its improvement plan to ensure the consistent use of functional assessments during the evaluation process.

Overrepresentation – The district has experienced significant growth during the last several years as a result of families moving into Gloucester Township. The district has indicated that this increase in population has resulted in an overrepresentation of minority students in special education.

- To assist the district in its data review and analysis to determine the factors leading to overrepresentation of minorities in special education, the district will participate in technical assistance sessions sponsored by OSEP during the 2001-2002 school year.

VI. Reevaluation

Summary of Findings:

The district accurately assessed compliance in the areas of reevaluation by June 30th for students turning 5 years of age. The district employs a child study team in the summer to conduct reevaluations.

During the self-assessment process the district identified areas of need regarding reevaluation timelines. The district has indicated they are experiencing similar issues with initial evaluation timelines. The improvement plan revisions indicated in Section V must be applied to this issue as well.

Additional areas of need were identified during on-site monitoring regarding parental consent for functional assessments conducted as part of the reevaluation process.

Areas of Need:

Consent – parental consent is not consistently obtained and documented for functional assessments that include more than a review of data, as part of the three-year reevaluation process.

- The district is directed to revise its improvement plan to ensure consent is consistently obtained and documented when functional assessments are conducted as a component of the three-year reevaluation process.

VII. Eligibility

Summary of Findings:

The district accurately assessed compliance in the areas of documentation of eligibility, meeting participants, and criteria for eligibility.

During the self-assessment process, the district identified areas of need regarding the provision of evaluation reports and timelines for eligibility meetings. The district's improvement plan is not sufficient to address these areas of need.

Areas of Need:

Eligibility Meetings and Evaluation Reports - The district indicated it is experiencing growth in both the regular and special education populations. As a result, there has been an increase in referrals and an increase in the need for additional services. The district has indicated that it is not unusual to evaluate as many as 100 students during the summer months. Because of these increases, eligibility meetings are not

consistently convened in a timely manner and evaluation reports are not provided within the required timelines.

- The district is directed to revise its improvement plan to include procedures that will ensure the district convenes eligibility meetings in a timely manner and provides copies of evaluation reports no later than when it provides notice of the student's eligibility.

VIII. IEP

Summary of Findings:

The district accurately assessed compliance in the areas of annual review timelines, goals and objectives relating to the Core Curriculum Content Standards, and informing parents about progress related to identified goals and objectives.

During the self-assessment process, areas of need were identified by the district regarding a lack of consistency in IEP documentation regarding the frequency and amount of time support teachers are in the classroom, and a lack of consistency in documenting transition information and extended school year determinations in IEPs.

Areas of Need:

IEP/Teacher Schedules – A review of IEPs indicated the district does not consistently identify the frequency and amount of instructional time the in-class teacher will be in the student's mainstream class.

- The district is directed to revise its improvement plan to ensure that IEPs accurately identify the frequency and amount of instructional time the in-class support teacher will be in the class.

Documentation of IEP Components - IEPs did not consistently document information relating to the determinations regarding transition services and ESY programs.

- The district is directed to revise its improvement plan to ensure consistent documentation of transition services and ESY determinations.

IX. Least Restrictive Environment

Summary of Findings:

The district accurately assessed compliance in the area of consideration of the need for supplementary aids and services.

During the self-assessment process, areas of need were identified by the district regarding provision of the full continuum for preschool students and elementary students with significant behavioral issues, and the documentation of consideration of regular education programs as the first option. The district's improvement plan is insufficient to address these areas of need.

Additional areas of need were identified during the on-site monitoring regarding decision-making for placement in the least restrictive environment and consideration of participation in extra-curricular and nonacademic activities for students placed out-of-district and in self contained classes

Areas of Need:

Continuum of Services for Preschool Students –During the self-assessment process, the district identified the need for more regular education options for preschool students. However, the improvement plan does not identify procedures for ensuring that regular education is considered for all students and provided when appropriate.

- The district is directed to revise its improvement plan to ensure that regular education options are consistently considered for preschool students and provided when appropriate.

Continuum of Services for Elementary Students with Behavioral Disabilities – During the self-assessment process, the district identified the need for a behavioral disabilities program at the elementary level. The district currently provides a comprehensive program at the middle school level and there is a need for this type of service for younger students. However, the improvement plan does not identify procedures for establishing and implementing this program.

- The district is directed to revise its improvement plan to include specific procedures to establish programs for elementary students with behavioral disabilities.

Individualized Decision-Making –The district currently provides a variety of in-district programs ranging from in-class support to self-contained classes. The extent of the in-class programs varies significantly from building to building. Some schools offer this program in nearly every subject and level. Others offer in-class services only in certain subjects or at certain grade levels. Interviews with staff members indicate that the decision to provide this type of program is not consistently based on student need. Factors such as facilities, staff availability, scheduling, and other administrative issues determine the level of services in some buildings.

- The district is directed to revise its improvement plan to ensure that decision-making for placement in the least restrictive environment is based on individual student need and not on administrative barriers such as facilities, staff availability, scheduling, and/or other administrative issues. The plan must include a

mechanism to remove the barriers that may prevent implementation of an appropriate decision-making process.

Extracurricular and Nonacademic Activities for Out-of-District Students –The district provides access to numerous extracurricular and nonacademic activities to students in in-district programs. Interviews with staff indicate that these same options are not consistently offered to out-of-district students. In addition, a review of student IEPs indicated that this component is not addressed for any student, regardless of placement.

- The district is directed to revise its improvement plan to ensure that participation in extracurricular and nonacademic activities are consistently considered and offered to all district students and that documentation of this consideration is maintained.

X. Transition

Summary of Findings:

The district accurately assessed compliance in the areas of transition to preschool by the child's third birthday. In instances where transition did not occur by the third birthday, parent lateness in referral of the child delayed the process.

During the self-assessment process the district identified areas of need regarding improving attendance of child study team members at preschool transition planning conferences, increased involvement and participation of agencies, and improvement of the IEP statement of transition services at age 14. The district's improvement plan was insufficient to address these areas of need.

An additional area of need was identified during the on-site visit regarding consistent documentation of the student's interests and preferences in the IEP.

Areas of Need:

Meeting Participants – the district indicated that child study team attendance at preschool transition planning conferences is inconsistent.

- The district is directed to revise the improvement plan to ensure that child study team members participate in preschool transition planning conferences.

Agency Involvement – the district stated that agencies are not consistently involved and do not consistently participate in transition planning for students.

- The district is directed to revise their improvement plan to ensure that appropriate representatives from agencies are consistently invited to meetings involving transition planning to actively participate in the transition planning process for students.

Age 14/Transition Service Needs – The district indicated that at age 14, the statement of transition services is not consistently included in the IEP.

- The district is directed to revise their improvement plan to ensure that at age 14, the statement of transition services is consistently included in the IEP.

Documentation of student interests and preferences – the district does not consistently document student’s interests and preferences and the manner in which interests and preferences are obtained.

- The district is directed to revise their improvement plan to ensure consistent documentation that the student had the opportunity to express his/her interests and preferences and that these interests and preferences were considered by the IEP team.

XI. Discipline

Summary of Findings:

The district accurately assessed compliance in the areas of notifications to the case managers, suspension tracking, maintaining the same disciplinary standards for students with disabilities unless identified in the IEP, and conducting manifestation determinations and functional behavior assessments.

During the self-assessment process, the district identified concerns with documenting the relationship between behavior and academic performance and that homebound instruction is utilized as the sole Interim Alternative Educational Setting. The district indicated a need to expand the array of available options for Interim Alternative Educational Settings.

Area of Need:

Interim Alternative Educational Setting – The district indicated it wanted to expand its IAES program options for students removed for weapons, illegal drugs or controlled substances and for students who are a danger to themselves or others because it currently offers only homebound instruction.

- The district is directed to revise its improvement plan to include the procedure it will follow to identify and implement additional IAES for students requiring this type of placement option.

Relationship Between Behavior and Academic Performance – This issue was addressed in Section V - Evaluation.

XII. Statewide Assessment

Summary of Findings:

Statistics reviewed by OSEP indicate that the district exempts approximately 2% of students with disabilities from participation in the GEPA. The district accurately assessed that students who participate in statewide assessments receive appropriate modifications and accommodations as specified in individual student IEPs.

During self-assessment, the district identified a concern in the area of training for child study teams in the content of ESPA and GEPA. This issue was addressed in Section I – General Provisions.

XIV. Programs and Services

Summary of Findings:

The district accurately assessed compliance in the area of class size, age range, the provision of aides when required, appropriately certified staff, group size, and home instruction approval.

An area of need was identified during the on-site visit regarding common planning time for teachers.

Areas of Need:

Common Planning Time – During staff interviews, it was reported that special education teachers and general education teachers are not provided with common planning time.

- The district is directed to revise their improvement plan to ensure that special education teachers and regular education staff are afforded the opportunity to collaborate during common planning time.

XV. Student Records

Summary of Findings:

The district accurately assessed compliance in the areas of collection, maintenance, access, and destruction of student records.

Additional areas of need were identified during the on-site visit regarding the maintenance of access sheets in student files, parental notification of the destruction of student records, and location of student records.

Areas of Need:

Access Sheets – Student files do not consistently include access sheets.

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

Parent Notification – The district was unable to document that parents were notified when student records were destroyed.

- The district is directed to revise its improvement plan to ensure parents are notified prior to the destruction of student records and that documentation of such notice is consistently maintained by the district.

Location of Files – The location of other student records was not consistently identified in the files.

- The district is directed to revise its improvement plan to ensure that the location of other student records is consistently identified in student record files.

Summary

On-site special education monitoring was conducted in the Gloucester Township School District from October 30 to 3, 2000. The purpose of the monitoring visit 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 process, the district was able to self-identify a significant number of areas of need and develop an improvement plan that, with revision, should bring about systemic change.

At a focus group meeting held prior to the visit, parents had the opportunity to provide input regarding systemic practices and procedures. Parents identified areas of concern while also expressing satisfaction with district programs and practices.

The on-site visit and self-assessment determined that the district provides a free and appropriate public education to all students, has implemented sound evaluation procedures, recruits and hires appropriately certified staff, has appropriate Child Find procedures, and provides appropriate modifications/accommodations for participation in statewide assessments.

The self-assessment process and on-site visit identified the need for improvement in the areas of staff development, the need for additional programs at the elementary level, the provision of extended school year services, related services, location, referral and identification procedures, and evaluation timelines during the summer months.

Within forty-five days of receipt of the monitoring report, the district is required to revise and resubmit the improvement plan to the Office of Special Education Programs to address the areas of need identified during the on-site monitoring visit.