

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

**District:** Greenwich Township School District

**County:** Gloucester

**Monitoring Dates:** February 3, 4, and 5, 2003

**Monitoring Team:** Caryl Carthew and Jane Marano

***Background Information:***

During the 2001–2002 school year, the Greenwich 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 Greenwich 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 Greenwich Township School District developed an improvement plan to address identified areas of need.

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

As the first step in the on-site monitoring process, the New Jersey Department of Education (NJDOE) held a focus group meeting for parents and community members at the Nehaunsey Middle School on January 27, 2003. 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 has implemented a Superintendent's Book Club. This provides a forum for district staff members to discuss and explore a variety of educational topics. It is expected that this forum will foster the development of a common understanding of

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issues relating to educational theory and implementation of innovative instructional strategies for all students, including students with disabilities.

The district has implemented the Natural Helpers program open to both disabled and nondisabled middle school students. Students are selected by their peers to participate in this multi-faceted program, which includes training as peer mediators and peer mentors, as well as an outward-bound program that fosters the development of student leadership skills.

The district has implemented the Fast ForWord program for students, both disabled and nondisabled, with weaknesses in phonemic awareness. The district is commended for the commitment of both time and resources in the training and implementation of this highly individualized program.

### ***Area Demonstrating Compliance With All Standards:***

**Statewide Assessment** 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.

### ***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.

An area of need was identified during the on-site visit regarding professional and parent development and a facility issue. The county office has been notified of the facility issue.

#### **Area(s) of Need:**

**Professional and Parent Development** – During the on-site visit, interviews with staff and parents identified a need for additional training opportunities for regular education staff on a variety of topics including strategies for implementing inclusion programs, information on characteristics of specific disabilities, and making instructional accommodations and modifications for disabled students. In addition, a need was identified for more parent training opportunities.

- **The district will revise its improvement plan to include procedures to ensure regular education staff members receive in-service training on topics related to special education and that parents are offered workshop opportunities. The plan must include a mechanism to determine additional and/or ongoing staff and parent needs regarding in-service as well as a mechanism to determine the effectiveness of these training opportunities. The plan must also include an administrative oversight component to ensure the consistent, compliant implementation of the procedures.**

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

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

During self-assessment the district accurately identified themselves compliant in the areas of extended school year, transfer procedures, length of school day/year, oversight of IEP implementation, and certification.

During the self-assessment process, the district identified concerns in the areas of facilities and provision of occupational therapy services. The district's improvement plan is sufficient to address these areas.

Additional areas of need were identified during the on-site visit regarding goals and objectives for occupational therapy and counseling and frequency of special education and related services.

#### **Area(s) of Need:**

**Related Services Goals and Objectives** – During the on-site visit, interviews with staff members and a review of records indicated that goals and objectives for occupational therapy and counseling are not consistently included in IEPs.

- **The district will revise its improvement plan to include procedures to ensure that IEPs contain goals and objectives for related services. The plan must also include an administrative oversight component to ensure the consistent, compliant implementation of the procedures.**

**Frequency of Special Education and Related Services** – During the on-site visit, interviews with staff members and a review of IEPs indicated that special education and related services are to be provided on a weekly basis. A review of district schedules indicates that the district has developed a schedule that consists of a six-day cycle instead of the standard five-day cycle. This six-day cycle is not articulated in the IEPs. As such, students are not receiving the amount of services required by their IEPs.

- **The district will immediately provide services in accordance with current IEPs and develop a plan to provide compensatory services for those not received during the current school year. Additionally, the district will revise its improvement plan to include procedures to ensure that, in the future, IEPs clearly and accurately identify the frequency of the programs and services. The plan must also include an administrative oversight component to ensure the consistent, compliant implementation of the procedures.**

### **Section III: Procedural Safeguards**

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

During self-assessment the district accurately identified themselves compliant in the areas of consent, native language, and independent evaluations.

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During the self-assessment process, the district identified concerns in the area of surrogate parents. The district's improvement plan is sufficient to address this area.

Additional areas of need were identified during the on-site visit regarding notice of a meeting, components of written notice, written notice for eighth grade annual review meetings, meeting participants, and provision of code documents.

### **Area(s) of Need:**

**Notice of a Meeting** – During the on-site visit, a review of student records indicates that notices of a meeting for students eligible for speech-language services do not consistently identify the purpose, time, location, and participants. Notices of a meeting for students eligible for special education and related services do not include a statement of the parent's right to bring other persons to the meeting when the purpose of the meeting is to develop, review, and or revise the IEP. In addition, notices of a meeting do not inform parents that transition will be discussed, when required.

- **The district will revise its notices of a meeting to ensure they contain all required components. It is recommended the district adopt the notice forms developed by the Office of Special Education Programs.**

**Written Notice** – During the on-site monitoring, a review of student records indicated that written notice of the nature and scope of the evaluation for speech and language services does not include a description of the action proposed. Written notice of the nature and scope of the evaluation for special education and related services does not include an explanation of why the action is proposed.

- **The district will revise its written notices to ensure they contain all required components. It is recommended the district adopt the notice forms developed by the Office of Special Education Programs.**

**Written Notice for Eighth Grade Annual Reviews** – During the on-site visit, interviews with staff members and a review of student records indicated the district does not provide written notice following the annual review conference for eighth grade pupils. At these conferences, a representative from the high school district attends and an IEP is developed for the following school year. However, the IEP and notice of that IEP is not provided by the district within 15-days of the meeting. Instead, parents receive the IEP, which also serves as notice, from the receiving high school district prior to September.

- **The district will revise its improvement plan to include procedures to ensure the district provides written notice within 15-days of the eighth grade annual review meeting. The plan must also include an administrative oversight component to ensure the consistent, compliant implementation of the procedures.**

**Meeting Participants** – During the on-site visit, interviews with staff members and a review of student records indicated that regular education teachers do not participate in meetings for students who are eligible for speech and language services, for identification meetings for preschoolers, and are inconsistently in attendance for other meetings for students who are eligible for special education and related services. Additionally, the full child study team is not consistently in attendance for identification meetings and special education teachers are not in attendance at initial IEP meetings.

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- **The district will revise its improvement plan to include procedures to ensure that the required participants are in attendance at all required meetings. The plan must also include an administrative oversight component to ensure the consistent, compliant implementation of the procedures.**

**Provision of Code Documents** – During the on-site visit, interviews with staff members and a review of student records indicated the district does not provide a copy of N.J.A.C. 6A:14 and 1:6A to parents when a referral is received for speech and language evaluations.

- **The district will revise its improvement plan to include procedures to ensure the district provides N.J.A.C. 6A:14 and 1:6A whenever it receives a referral for an evaluation. The plan must also include an administrative oversight component to ensure the consistent, compliant implementation of the procedures.**

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

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

During self-assessment the district accurately identified themselves compliant in the areas of Child Find, referral process for school-aged students, procedures for summer referrals, and direct referrals from staff and parents for school-aged students.

During the self-assessment process, the district identified concerns in the area of identification meeting timelines. The district's improvement plan is sufficient to address this area.

Additional areas of need were identified during the on-site visit regarding preschool referrals, vision/hearing screenings and health summaries, and language referrals.

#### **Area(s) of Need:**

**Preschool Referrals** – During the on-site visit, interviews with staff members and a review of student records indicated the district does not consistently conduct identification meetings for preschoolers referred for an initial evaluation. When a parent makes a referral for a preschooler, an appointment is made with the full child study team for a preschool screening, which includes an observation of the child and administration of formal and informal screening instruments by members of the child study team. Based on those results, a determination is made whether to conduct an evaluation. If an evaluation is warranted, the child study team conducts an identification meeting with the parent immediately following the screening. If, however, the team determines no evaluation is warranted, an identification meeting is not held and the parent is not provided with written notice.

- **The district will immediately cease this screening process. The district will revise its improvement plan to include procedures to ensure the district conducts an identification meeting with all the required participants for all students referred for a preschool evaluation to review available data and**

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**determine whether an evaluation is warranted. In the event an evaluation is warranted, the identification meeting participants, which include a regular education teacher, will determine the nature and scope of the evaluation and provide the parent with notice of that proposed action. Prior to conducting those assessments, parental consent will be obtained. The plan must include in-service training, a mechanism to determine the effectiveness of the training and an administrative oversight component to ensure the consistent, compliant implementation of the procedures.**

**Vision/Hearing Screenings and Health Summaries** – During the on-site visit, interviews with staff members and a review of student records indicated the district does not conduct vision/hearing screenings and health summaries prior to the identification meeting for preschool referrals.

- **The district will revise its improvement plan to include procedures to ensure the district conducts vision/hearing screenings and health summaries for every student referred for an evaluation. The plan must also include an administrative oversight component to ensure the consistent, compliant implementation of the procedures.**

**Language Referrals** – During the on-site visit, interviews with school personnel and a review of student records indicated that when a student is referred for a speech-language evaluation and language issues are identified prior to the determination of eligibility, although a referral is made to the child study team, the process of determining eligibility for speech-language services continues and services are provided. Once a determination is made by the child study team, the child's classification is either changed to eligible for special education and related service or the child continues as eligible for speech-language services.

- **The district will revise its improvement plan to include procedures to ensure the speech therapist(s) immediately refers a student to the child study team in the event a language-based disability is identified during the course of an evaluation to determine eligibility for speech-language services. The plan must further ensure the speech therapist(s) discontinues the process at the point that eligibility will be determined. The plan must also include in-service training, a mechanism to determine the effectiveness of the training and an administrative oversight component to ensure the consistent, compliant implementation of the procedures.**

### ***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 CST evaluations, CST written reports, bilingual evaluations, and acceptance/rejection of reports.

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During the self-assessment process, the district identified concerns in the area of preparation of written reports for speech-language evaluations. On-site monitoring activities verified that this issue has been corrected.

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

### **Area(s) of Need:**

**Multidisciplinary Evaluations for Preschool** – During the on-site visit, interviews with staff members and a review of student records indicated the district does not conduct evaluations by at least two members of the child study team when evaluating preschool students. The district currently considers the assessment by the speech-language specialist to meet the requirement for one of these evaluations.

- **The district will revise its improvement plan to include procedures to ensure the district conducts a minimum of two child study team assessments for preschoolers and that if a speech-language is required, that it be conducted in addition to the other child study team assessments. The plan must also include an administrative oversight component to ensure the consistent, compliant implementation of the procedures.**

**Functional Assessments for Speech Evaluations** – During the on-site visit, interviews with staff members and a review of student records indicated that speech-language evaluations do not include all the required components of functional assessments. Specifically, evaluations do not include a student observation, a parent interview, and documentation from the child's teacher of the educational impact of the speech problem.

- **The district will revise its improvement plan to include procedures to ensure that speech-language evaluations include the required components of a functional assessment. The plan must also include an administrative oversight component to ensure the consistent, compliant implementation of the procedures.**

### ***Section VI: Reevaluation***

#### **Summary of Finding:**

During self-assessment the district accurately identified themselves compliant in the areas of child study team 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 reevaluations for students eligible for speech-language services.

#### **Area(s) of Need:**

**Speech Reevaluations** – During the on-site visit, interviews with staff members and a review of student records indicated the district does not conduct a reevaluation when considering a change in eligibility for students classified as eligible for speech-language

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services. Students are dismissed from services at the annual review conference based on progress towards goals and objectives and end-of-the year assessments without documenting this review of existing data and without considering the need for additional data.

- **The district will revise its improvement plan to include procedures to ensure the district conducts a reevaluation when considering a change in eligibility for students classified as eligible for speech-language services. The plan must also include an administrative oversight component to ensure the consistent, compliant implementation of the procedures.**

### **Section VII: Eligibility**

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

During self-assessment the district accurately identified themselves compliant in the areas of eligibility meetings for students evaluated for special education and related services, eligibility criteria, provision of child study team reports to parents, and documentation of eligibility.

During the self-assessment process, the district identified concerns in the area of provision of speech-language evaluation reports to parents. On-site monitoring activities verified that this issue has been corrected.

Additional areas of need were identified during the on-site visit regarding eligibility meetings for students evaluated for speech-language services and agreement/disagreement with eligibility determinations.

#### **Area(s) of Need:**

**Eligibility Meetings for Speech Students** – During the on-site visit, interviews with school personnel and a review of pupil records indicated the district does not conduct eligibility meetings for speech-only students when evaluation results do not indicate a need for services. Eligibility meetings are only conducted if a speech IEP is going to be developed.

- **The district will revise its improvement plan to include procedures to ensure that eligibility meetings are conducted for all students evaluated for speech-language services. The plan must also include an administrative oversight component to ensure the consistent, compliant implementation of procedures.**

**Certification of Agreement/Disagreement** – During the on-site visit, interviews with staff members and a review of pupil records indicate that not all members of the IEP team certify in writing whether the determination of eligibility reflects his/her opinion. Although the district has developed a form to record these signatures, interviews indicated that they are unaware that these signatures should include all members of the IEP team, including the teachers. In addition, this process is not in place for speech-language evaluations.



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- **The district will revise its improvement plan to include procedures to ensure that each member of the IEP team certifies in writing their agreement or disagreement with eligibility determinations. The plan must also include an administrative oversight component to ensure the consistent, compliant implementation of the procedures.**

### ***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 aligned to the Core Curriculum Content Standards, IEP implementation dates, annual review timelines, and teacher knowledge/access to IEPs.

During the self-assessment process, the district identified concerns in the area of 90-day timelines. On-site monitoring activities verified that this issue has been corrected.

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

#### **Area(s) of Need:**

**IEP Revisions** – During the on-site visit, interviews with staff members and a review of student records indicated the district does not consistently convene an IEP meeting prior to making changes in a student's program.

- **The district will revise its improvement plan to include procedures to ensure IEPs are revised prior to making changes in student programs and that the parent/adult student is provided with written notice of the proposed change. The plan must include an administrative oversight component to ensure the consistent, compliant implementation of the procedures.**

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

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

During self-assessment the district accurately identified themselves compliant in the areas of individualized decision-making, continuum of services for school-aged pupils, Oberti considerations, provision of supplemental aids and services, and access to regular education programs.

During the self-assessment process, the district identified concerns in the area of IEP documentation of the decision-making process. The district's improvement plan is sufficient to address this area. The district further identified concerns regarding placement options for preschool students. Barriers to compliance include funding issues and a lack of coordination with community-based preschool programs. **The district's improvement plan is insufficient to address this area because it lacks procedures to ensure that outreach is made to community-based programs. In addition, an**

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**administrative oversight component is lacking to ensure the consistent implementation of the procedures.** The plan needs to be revised to include these components.

An additional area of need was identified during the on-site visit regarding notification of extracurricular activities to parents of students placed in out-of-district programs.

**Area(s) of Need:**

**Notification of Extracurricular Activities** – During the on-site visit, interviews with staff indicated parents of students placed in out-of-district programs are not being notified of extracurricular activities offered within the district.

- **The district will revise its improvement plan to include procedures to ensure parents of students placed out-of-district are notified of district sponsored extracurricular activities. The plan must also include an administrative oversight component to ensure the consistent, compliant implementation of the procedures.**

**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, agency involvement, and statement of needed transition services.

An area of need was identified during the on-site visit regarding transition planning for students turning age 14.

**Area(s) of Need:**

**Transition Planning for Students Turning 14** – During the on-site visit, interviews with staff members and a review of pupil records indicate that although the district consistently conducts transition planning meetings and invites students to participate in IEP meetings occurring in the spring of eighth grade, district personnel were unaware of the requirement to conduct transition planning for students who will turn 14 during the period of time the eighth grade annual review IEP will be in effect.

- **The district will revise its improvement plan to include procedures to ensure that transition planning is conducted for students who will turn 14 during the time period the IEP is in effect. The plan must include an administrative oversight component to ensure the consistent, compliant implementation of the procedures.**

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### **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 discipline procedures, notification of removals to case managers, suspension tracking, development of behavior intervention plans, functional behavior assessments, and procedures for placement in interim alternative education settings.

During the self-assessment process, the district identified concerns in the area of manifestation determinations. **The district's improvement plan is insufficient to address this area because it lacks procedures, in-service training and a mechanism to determine the effectiveness of the training to ensure the consistent, compliant implementation of the procedures.** The plan needs to be revised to include these components.

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

### **Section XIII: Graduation**

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

During self-assessment the district accurately identified themselves compliant in the area of participation in graduation exercises.

An area of need was identified during the on-site visit regarding IEP requirements for students turning 14.

#### **Area(s) of Need:**

**IEP Requirements for Students Turning 14** – During the on-site visit, interviews with school personnel and a review of student records indicate that IEPs for students who will turn 14 during the time period the IEP will be in effect do not consistently include graduation requirements.

- **The district will revise its improvement plan to include procedures to ensure that IEPs for students turning 14 during the period of time the IEP is in effect include graduation requirements. The plan must include an administrative oversight component to ensure the consistent, compliant implementation of the procedures.**

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### **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, and homebound instruction.

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 area.

Additional areas of need were identified during the on-site visit regarding provision of in-class support services and common planning time.

#### **Area(s) of Need:**

**In-class Support Services** – During the on-site visit, interviews with staff and a review of teacher schedules and student IEPs indicated that in-class support services are not consistently provided by a certified special education teacher. In some instances, these services are provided by an instructional aide. Barriers to compliance include scheduling and availability of personnel.

- **The district will revise its improvement plan to include procedures to ensure that in-class support services are provided by certified special education teachers. In the event a determination is made by the IEP team that a student would benefit from instruction in the general education setting with the assistance of an aide, the IEP would have to be revised at an IEP meeting with all required participants and written notice provided to the parent. The plan must include an administrative oversight component to ensure the consistent, compliant implementation of the procedures.**

**Common Planning Time** – During the on-site visit, interviews with staff members indicate that resource teachers and regular education staff are not provided with common planning time. Staff members indicated this is a major barrier to providing effective support programs.

- **The district will revise its improvement plan to include procedures to ensure regular and special education teachers have common planning time. The plan must also include an administrative oversight component to ensure the consistent, compliant implementation of the procedures.**

### **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, and procedures for maintenance and destruction of records.

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During the self-assessment process, the district identified concerns in the areas of access sheets. **The district's improvement plan is insufficient to address this issue because it lacks procedures and an oversight mechanism to bring about the required changes.** The plan needs to be revised to include this component. In addition, the district identified concerns regarding the documentation of locations of other pupil records. Activities conducted during the on-site verified that this issue has been corrected.

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

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## **Summary**

On-site special education monitoring was conducted in the Greenwich Township School District on February 3, 4, and 5, 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. As a result of the district's review they were able to identify some areas of need and develop an improvement plan that with some revision will bring about systemic change.

At a focus group meeting held prior to the monitoring visit, parents expressed their satisfaction with many of the district's programs and services. Some concerns were expressed regarding staff development and implementing accommodations and modifications within the regular education classroom.

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, extended school year, provision of related services other than OT, length of school day/year, transfer procedures, certification, consent, native language, independent evaluations, Child Find, referral procedures for child study team evaluations, procedures for conducting evaluations and reevaluations, eligibility determination, IEP development, IEP components, age of majority, timelines for annual reviews and reevaluations, access to regular education, continuum of services for school-aged pupils, preschool transition, discipline procedures, suspension tracking, functional behavioral assessments, procedures for placement in interim alternative educational settings, statewide assessments, class size, age range, homebound instruction, and procedures for maintenance and destruction of pupil records.

During the self-assessment process, the district identified areas of need regarding occupational therapy, facilities and accessibility, surrogate parents, identification meeting timelines, written reports for speech and language evaluations, 90-day evaluation timelines, IEP documentation of the placement decision-making process, LRE options for preschool, manifestation determinations, descriptions of special class programs, record access sheets, and documentation of the locations of pupil records. It should be noted that several of these issues were verified at the time of the on-site visit and are now compliant.

The on-site visit identified additional areas of need within the various standards regarding professional and parent development, goals and objectives for occupational therapy and counseling, frequency of special education and related services, notice of a meeting, written notice, meeting participants, provision of code documents for speech referrals, preschool referrals, vision/hearing screenings and health summaries, procedures for language referrals, multidisciplinary assessments for preschool, functional assessments for speech evaluations, procedures for speech reevaluations, eligibility meetings, certification of agreement/disagreement with eligibility determination, IEP revisions, notification of extracurricular activities for students placed out-of-district, transition planning for students turning 14, IEP requirements for graduation, provision of in-class support services, and common planning time for resource teachers.

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

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