

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

District: Jackson Township

County: Ocean

Monitoring Dates: January 8-12, 16, and 17, 2001

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Background Information

During the 1999-2000 school year, the Jackson 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 Jackson Township School District with an opportunity to evaluate its strength and areas of need with regard to:

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

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

The Office of Special Education Programs conducted an on-site monitoring visit to verify the issues identified and address the appropriateness of the improvement plan and the progress made in implementing the plan.

As the first step in the on-site monitoring process, the NJDOE held a focus group meeting for parents and community members at the Administration Building on January 4, 2001. From this initial focus group meeting, themes were identified that would later be verified during the on-site visit. In addition to these themes, information from previous monitoring activities was available to the team and helped to direct the focus of the monitoring visit.

During the on-site visit, the monitoring team reviewed district documentation, including district policies and procedures, student count information, master student lists, class lists, schedules of students, teachers, and related service personnel, and other relevant information, including a representative sample of student records. Interviews were conducted with the district's special education director and supervisor, building principals, and child study team members, including speech-language specialists, guidance counselors, and school nurses. Input was also received from parents of students with disabilities. In addition, a random selection of the district's school buildings was visited and both general and special education teachers from these schools were interviewed.

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District compliance with the requirements of the Individuals with Disabilities Education Act (IDEA) 1997 and the New Jersey Administrative Code for Special Education (N.J.A.C. 6A: 14) was assessed. Areas identified by the district as compliant were reviewed to verify compliance. Systemic areas of need are identified in the following report of findings.

District Strengths

McAuliffe Middle School has been selected as one of five nominees for the National Service-Learning Leader Schools Program. This is a program that includes regular and special education students in a variety of community service learning projects including Peer Mediation, Peer Tutoring, Soup Kitchen, and Cancer Walk, among others.

McAuliffe Middle School operates a morning news program entitled "Wake Up McAuliffe" that has been recognized by the State of New Jersey for their Best Practices Award. This program is produced, directed, anchored, and taped entirely by both regular education and special education middle school students.

The district operates an after-school-tutoring program at the middle school level (ninth period) and at the high school level (fifth period) for both regular and special education students. During that time, teachers are available to meet with students to offer extra educational assistance.

Holman Elementary School offers the "Great Thinking Machine Show" to both regular and special education students. The program, developed by district personnel, is an interdisciplinary program designed to develop and enhance listening, critical thinking, viewing, and public speaking skills in a game show format. The program is described as a brain-based language program incorporating the Core Curriculum Content Standards that focuses on the needs of students with auditory processing difficulties. The program has been recognized by the New Jersey Association of Supervision and Curriculum and the New Jersey Department of Education.

The district offers a vocational life skills program at the high school level for classified pupils. This program includes a café that is operated by the students in the program and utilized by building staff, as well as a vocational shop program.

The district has partnered with Monmouth-Ocean Educational Services Commission, Georgian Court College, and fourteen other school districts to implement the Collaboration, Awareness, Reinforcement, Evaluation (C.A.R.E.) Program. This program offers a regional professional development academy for administrators, teachers, staff, and parents that has enabled schools and communities to receive skill enhancement opportunities to better understand disabilities and to utilize more effective instructional practices.

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Statement of Findings

I. General Provisions

Summary of Findings:

The district accurately assessed compliance regarding policies and procedures and making available to parents of students with disabilities and to the general public all documents pertaining to the eligibility of the district under Part B of the IDEA.

During the self-assessment process, the district identified a need for additional staff in-service training regarding behavior interventions and transition. The improvement plan activities do not sufficiently address this area of need.

An additional area of need was identified during the on-site monitoring regarding staff development for in-class support.

Area(s) of Need:

Staff Development - During the self-assessment process, the district identified a need for additional staff training in the areas of behavior management/interventions and transition. The improvement plan identifies broad topics and timelines, however no specific activities are included. In addition, the plan did not identify follow-up activities to evaluate the effectiveness of the training.

During the on-site monitoring, interviews with staff members identified additional areas of need regarding training at the high school level for both special education and regular education teachers who participate in the in-class support programs. These interviews indicated that training is not consistently provided. In some cases, staff members reported receiving no training prior to program implementation. They further reported little or no follow-up activities were conducted subsequent to the development of this program. Staff members at the high school also reported frequent changes to the team-teaching partnerships that negatively impact the implementation of inclusion programs at the high school.

- The district is directed to revise its improvement plan to identify specific training activities for behavior interventions/management and transition services. The district must also identify the procedures it will follow to ensure that high school staff members assigned to in-class support programs receive training during the school year. The plan must identify appropriate follow-up activities to evaluate the effectiveness of these training initiatives.

II. Free, Appropriate, Public Education (F.A.P.E.)

Summary of Findings:

The district accurately assessed compliance in the areas of certifications, length of school day and school year, transfer procedures and facilities.

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During the self-assessment process, the district identified the need for the provision of adaptive PE programs at the elementary level. The district's improvement plan is sufficient to address this area of need.

Additional areas of need were identified during the on-site monitoring regarding related services and extended school year.

Area(s) of Need:

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 for classified students is not consistently based on individual student need. Through interviews, it was reported that the decision for the amount of counseling services was often based on the availability of staff.

- The district is directed to revise its improvement plan to identify the procedures it will follow to ensure the provision of counseling services is based on individual student needs. The plan must include a mechanism to ensure the district is able to determine whether it has staff in sufficient numbers to provide this related service. In the event it does not have sufficient staff, the plan must include activities to address the district's staffing needs.

Related Services (Physical and Occupational Therapy) - During on-site monitoring, record review and interviews with staff indicated that physical therapy services do not begin when required by the IEP. Staff members reported that services do not begin until a prescription is received from the family physician. Delays in receiving these prescriptions result in a delay in providing the service. The district indicated that there are no procedures currently in place for alternate ways of obtaining required documentation from physicians.

A review of files indicated the provision of occupational therapy services is often two to three weeks after the identified start date in the IEP.

- The district is directed to revise its improvement plan to identify the procedures it will follow to ensure that physical and occupational therapies are provided in a timely manner. This plan must include alternate strategies to obtain PT prescriptions in the event the student's private physician fails to provide the prescription in a timely manner.

Extended School Year - During on-site monitoring, record review and interview with staff indicated that extended school year is not routinely considered and/or discussed for every child. This was particularly noted at the middle and high school levels. A review of IEPs indicated team members are not including a description of the ESY program/services when it is determined ESY is appropriate.

- The district is directed to revise its improvement plan to identify the procedures it will follow to ensure that an extended school year is considered and discussed for all students with disabilities. The plan must include a component to ensure the IEP describes the ESY program/services the student will receive.

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III. Procedural Safeguards

Summary of Findings:

The district accurately assessed compliance regarding provision of procedural safeguards (N.J.A.C. 6A: 14; N.J.A.C. 1:6A; PRISE).

During the self-assessment process, the district identified an area of need regarding methods for selecting and training surrogate parents. The district's improvement plan sufficiently addresses this issue.

Additional areas of need were identified during the on-site monitoring regarding native language, transfer of rights at the age of majority, notice of a meeting, and timelines for provision of written notice.

Area(s) of Need:

Native Language - During the on-site monitoring, a review of records and interviews with district personnel indicated the district provides interpreters for parents who do not speak English. However, documentation of the participation of interpreters at parent meetings is not consistently maintained. In addition, notice of a meeting and written notice is not provided in the native language of the parent, when feasible.

- The district is directed to revise its improvement plan to identify the procedures it will follow to ensure that documentation of the participation of interpreters at meetings is maintained in student records.
- The district is directed to revise its improvement plan to identify the procedures it will follow to ensure that notice of a meeting and written notice are provided to parents in their native language, when feasible.

Transfer of Rights - During the on-site monitoring, a review of IEPs indicated that the notice of the transfer of rights at the age of majority is done one year before the student turns eighteen, not three years before as required by code.

- The district is directed to revise its improvement plan to identify the procedures it will follow to ensure that notification of the transfer of rights at the age of majority occurs at least three years before the student's eighteenth birthday.

Notice of a Meeting - During the on-site monitoring, a review of student records indicated that notice of a meeting for eligibility and/or IEP meetings included the following statement: "participants may include..." This broad statement does not ensure that parents are fully informed of the individuals who will actually be in attendance at meetings. In addition, notice of a meeting for the purpose of conducting a manifestation determination does not include the required IEP team members. Specifically, neither the special education nor the general education teachers are identified as participants.

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- The district is directed to revise its improvement plan to identify the procedures it will follow to ensure that notice of a meeting, including meetings where a manifestation determination will be conducted, accurately identifies the individuals who will be in attendance at the meeting.

Timelines for Written Notice - During the on-site monitoring, a review of records and interviews with parents and district personnel indicated that written notice is not consistently provided within 15 days of a meeting. Though district personnel reported that parents, on occasion, receive a copy of notice at the time of the meeting, a review of records failed to support this statement. When notice was provided after a meeting, documentation indicates the provision was beyond the required 15-day timeline.

- The district is directed to revise its improvement plan to identify the procedures it will follow to ensure that written notice is provided within 15 days of the meeting. The plan must include a component to ensure this provision is documented in student files.

IV. Location, Referral & Identification

Summary of Findings:

The district accurately assessed compliance regarding written procedures for referral, Child Find, pre-referral interventions, direct referrals, meeting participants, and vision/hearing screenings.

Areas of need were identified during the on-site monitoring regarding timelines for identification meetings, PAC procedures, and timelines for written notice (notice is addressed in Section III).

Area(s) of Need:

Identification Meeting Timelines - During the on-site monitoring visit, interviews and record reviews indicated that identification meetings are not consistently held within 20 days of the district's receipt of the written referral. Interviews with district personnel further indicated that delays were due to large caseloads, delays in forwarding referrals to the child study teams, and summer work schedules for team members.

- The district is directed to revise its improvement plan to identify the procedures it will follow to ensure compliance with the 20-day timeline. The plan must include an oversight component to ensure district-wide compliance with these procedures.

PAC Procedures - During the on-site monitoring visit, interviews with school personnel and a review of documentation indicated PAC committees often recommend outside evaluations as part of the PAC process, specifically neurological and audiological assessments. Interviews indicated PAC committee members often ask parents to obtain these assessments through their health insurance and then use these assessment results to determine whether the student should be referred to the child study team for a more comprehensive evaluation.

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- The district is directed to revise its improvement plan to identify the procedures it will follow to ensure a more appropriate method of determining whether a student needs to be referred to the child study team is followed by PAC members. The plan must include a mechanism to inform school-based administrators of the inappropriateness of the current procedures that require parents to obtain assessments before a determination is made to forward a referral to the child study team. The new procedures must include activities to ensure that in the event PAC members believe a referral may be warranted, they forward that request to the team so an appropriately configured group determines whether to conduct a comprehensive evaluation at public expense and with parental consent.

V. Protection In Evaluation

Summary of Findings:

The district accurately assessed compliance in the areas of the provision of technically sound, multidisciplinary evaluations, acceptance and/or rejection of reports, and signed/dated written reports.

Areas of need were identified during on-site monitoring regarding components of evaluation reports and changes to the evaluation.

Area(s) of Need:

Components of Evaluation Reports – A review of records and interviews with district personnel indicated that evaluation reports do not consistently include an interview with the student's teacher or a review of pre-referral interventions.

- The district is directed to revise its improvement plan to identify the procedures it will follow to ensure that evaluation reports include an interview with the student's teacher and a review of pre-referral interventions.

Change in the Nature and Scope of the Evaluation – A review of records and interviews with staff members and parents indicated that when additional specialized assessments are required after the nature and scope of the initial evaluation has been determined and consented to by the parent, written notice proposing a change to the evaluation is not provided.

- The district is directed to revise its improvement plan to identify the procedures it will follow to ensure that when additional assessments are required subsequent to receiving initial parental consent to evaluate, parents are provided with written notice of the proposed change to the evaluation.

VI. Reevaluation

Summary of Findings:

The district accurately assessed compliance regarding the review of existing data, conducting planning meetings, proceeding without undue delay, and evaluating preschool students by June 30th of the year they turn school age.

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Areas of need were identified during the on-site monitoring regarding the three-year timeline for conducting reevaluations and timelines for providing written notice (notice is addressed in Section III).

Area(s) of Need:

Three-year Timelines - During the on-site monitoring, an additional area of need was identified regarding the need to conduct reevaluations within the three year timeline.

- The district is directed to revise its improvement plan to identify the procedures it will follow to ensure that multidisciplinary reevaluations are conducted within three years of the previous classification. The plan must include an oversight component to ensure district-wide compliance with these procedures.

VII. Eligibility

Summary of Findings:

The district accurately identified compliance regarding eligibility meetings, initial evaluation timelines, and meeting participants.

Areas of need were identified during the on-site monitoring regarding the documentation of the category of specific learning disability, provision of evaluation reports to parents, determination of eligibility prior to receipt of specialist reports, and written notice (notice is addressed in Section III).

Area(s) of Need:

Category of Specific Learning Disability - During the on-site monitoring, a review of student records indicated that when the district determines that a student has a specific learning disability, the written documentation reiterates the code definition and does not identify the specific area(s) where the discrepancy exists.

- The district is directed to revise its improvement plan to identify the procedures it will follow to ensure that for each student identified as having a specific learning disability, the documentation identifies the specific area(s) of discrepancy that exist between achievement levels and intellectual ability.

Evaluation Reports - During the on-site monitoring, interviews and record reviews indicated that evaluation reports are not provided to parents for students classified eligible for special education and related services and students classified eligible for speech-language services.

- The district is directed to revise its improvement plan to identify the procedures it will follow to ensure the provision of evaluation reports to parents no later than when written notice of eligibility is provided.

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Determination of Eligibility – During the on-site visit, interviews and record reviews indicated that specialist evaluations (for example: psychiatric and neurological) are not always available at the time of the eligibility meeting. As a result, the information contained in these reports are not considered when determining a student’s eligibility status.

- The district is directed to revise its improvement plan to identify the procedures it will follow to ensure consideration is given to the information contained in all assessments conducted to determine a student’s eligibility, including any assessment(s) by outside specialist(s). The plan must include a mechanism to ensure assessments conducted by specialists are received and reviewed in a timely manner.

VIII. Individualized Education Program

Summary of Findings:

The district accurately identified compliance regarding the alignment of goals and objectives to the core curriculum content standards.

During the self-assessment process, the district identified areas of need regarding the provision of the IEP to parents prior to implementation. The improvement plan activities do not sufficiently address this issue.

Additional areas of need were identified during the on-site monitoring regarding written notice (addressed in Section III), missing and/or incomplete IEPs, IEP components, and meeting participants.

Area(s) of Need:

Provision of the IEP Prior to Implementation - During the self-assessment process, the district identified that IEPs are not consistently provided to parents prior to implementation. The district currently uses a computerized IEP format and has indicated that additional clerical support is needed to ensure that IEPs are provided in a timely fashion. Although the improvement plan provides for this additional support, no oversight activities were identified to ensure that this plan is implemented on a district-wide basis.

- The district is directed to revise its improvement plan to identify the oversight activities that will be implemented to ensure that IEPs are provided to parents prior to program implementation.

Teacher Access to IEPs - During the on-site monitoring, interviews with staff members and classroom observations indicated that teachers do not consistently have IEPs for all of the students for whom they have educational responsibility. In addition, the copies provided to teachers are not always complete (missing goals and objectives, etc.). This was noted primarily at the middle and high school levels.

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- The district is directed to revise its improvement plan to identify the procedures it will follow to ensure that teachers have access to complete IEPs for those students for whom they have educational responsibility.

IEP Development - During the on-site monitoring, interviews with staff members indicated that the IEP does not include enough information to allow them to identify the specific educational needs for their students. In addition, teachers reported that they do not consistently have input into the development of the IEP.

- The district is directed to revise its improvement plan to identify the procedures it will follow to ensure personnel having educational responsibility for the student are afforded the opportunity to participate in the educational planning process. The plan must include a mechanism to ensure IEPs include information that is specific enough to allow instructional staff to identify the individual educational needs for each classified student.

IEP Implementation - During the on-site monitoring, a review of records indicated that a number of IEPs identified different programs throughout the document (for example: the present levels of educational performance indicated a need for in-class support, but the description of services identified pull-out replacement). Interviews with instructional staff indicated that the program is not always clearly identified in the IEP and teachers do not always know what type of service to provide. A random selection of IEPs indicated that, primarily at the high school level, students are not always placed into programs required by their IEP. Interviews with CST members indicated the district does not have a procedure to verify students are placed in accordance with their IEPs. Team members indicated that caseloads and other responsibilities impact on the time they have available to them to verify this type of information. This is particularly an issue at the high school level. In addition, IEPs for ninth grade students did not accurately identify the duration of special education services. A review of these IEPs indicated that some IEPs identified 40-minute blocks for half the school year instead of the 80-minute blocks they were actually receiving.

- The district is directed to revise its improvement plan to include the procedures it will follow to ensure IEPs accurately identify the duration of special education services for each student.
- The district is directed to revise its improvement plan to include the procedures it will follow to ensure that students are placed into the programs identified in their IEPs. This plan must include an administrative oversight mechanism, especially at the high school level.

IEP Components - During the on-site monitoring, a review of student records indicated that the required statement of how the parent will be informed of the student's progress regarding goals and objectives was missing from IEPs. In addition, student IEPs did not consistently include the following components although the district's IEP format does allow these components to be included: accommodations and modifications for statewide assessments; supplementary aids and services; frequency, location, and duration of services; and goals and objectives.

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- The district is directed to revise its improvement plan to ensure the district IEP format includes a statement as to how the parent will be informed of the student's progress in achieving the identified goals and objectives.
- The district is directed to revise its improvement plan to identify the procedures it will follow to ensure team members include all required components in IEPs.

Meeting Participants - During the on-site it was identified that regular and special education teachers are not consistently in attendance at IEP meetings, primarily at the high school level. It was further determined through document review that the signature page did not clearly identify the role of each meeting participant. Interviews with instructional staff members also indicated that teachers do not consistently have input into the development of IEPs.

- The district is directed to revise its improvement plan to include the procedures it will follow to ensure that regular and special education teachers are in attendance at IEP meetings, and are fully included in the development of the IEP. The plan must include a mechanism to ensure the role of each meeting participant is clearly identified on the signature page.

IX. Least Restrictive Environment

Summary of Findings:

The district accurately identified compliance with the need to determine annually the placement of a student with a disability.

Areas of need were identified during the on-site monitoring regarding placement decisions, non-academic and extra-curricular participation, access to regular education alternative programs, and preschool.

Area(s) of Need:

Placement Decisions - Interviews with staff members and parents during the on-site indicate that placement decisions for students are often determined by the availability of programs and staff, not by the individual needs of the student. A review of IEPs supported the information provided by district staff and parents.

- The district is directed to revise its improvement plan to identify the procedures it will follow to ensure that placement decisions are based on individual student needs and not on the availability of staff and/or programs. The plan must include a component to ensure the district conducts a needs assessment to more effectively determine district-wide programming and staffing needs.

Non-academic and Extracurricular Participation - Interviews with parents and district personnel during the on-site indicated that information is not consistently provided regarding opportunities for participation in non-academic and extra-curricular activities to families of students in out-of-district placements.

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- The district is directed to revise its improvement plan to identify the procedures it will follow to ensure that parents of students in out-of-district placements receive information regarding opportunities for participation in non-academic and extra-curricular activities.

Access to Regular Education Programs - During the on-site, an interview with district administrators indicated that classified students are denied access to the regular education alternative middle school program.

- The district is directed to revise its improvement plan to identify the procedures it will follow to ensure classified students have access to the middle school alternative program when that program is determined to be appropriate by the IEP team.

Preschool - A review of the district's Annual Data Report (December 1, 2000) indicates that of the resident preschool students, 82% are placed in special education settings. At the time of this data collection, no classified preschoolers were attending regular education settings on a full-time basis. Two students were included in a regular education setting on a part-time basis. Interviews with parents and staff indicated that placement in a regular education setting with supports and services is not considered as an option for preschoolers.

- The district is directed to revise its improvement plan to identify the procedures it will follow to ensure that regular education with appropriate supports and services is considered for each preschool student.

X. Transition

Summary of Findings:

During the self-assessment process the district identified areas of need regarding the identification of a post-secondary liaison, obtaining student input regarding interests and preferences prior to the IEP meeting, provision of community experiences and preschool transition. The district's improvement plan does not sufficiently address these issues.

Additional areas of need were identified during on-site monitoring regarding documentation of student invitations to meetings, student interests and preferences, IEP components, documentation of agency participation, technical consultation from Division of Vocational Rehabilitation, and reconvening the IEP team when a community agency does not provide services.

Area(s) of Need:

Post Secondary Liaison - As part of the self-assessment process, the district determined that they do not consistently identify the post-secondary liaison or make referrals to outside resources. The district's improvement plan addresses the development of a list of community resources, however the plan does not address the identification of the post-secondary liaison. A review of the IEP indicates that though the format allows for this component, it is rarely completed.

- The district is directed to revise its improvement plan to identify the procedures it will follow to ensure that the post-secondary liaison is identified in IEPs.

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Student Interests and Preferences - During the self-assessment process, the district identified areas of need regarding activities to ensure each student is prepared to provide input regarding personal interests, preferences and desired post-school outcomes. The district indicated that a student inventory should be implemented to obtain student preferences and interests. During on-site monitoring, a review of student records indicated that IEPs do not document the manner in which information about student interests and preferences is obtained.

- The district is directed to revise its improvement plan to identify the procedures to ensure IEPs document the manner in which student interests and preferences are obtained. The plan must also include oversight activities to ensure implementation of these procedures.

Community Experiences - During the self-assessment process the district identified areas of need regarding the inconsistent consideration and use of a variety of community experiences in developing student transition plans. The district's improvement plan identifies in-service opportunities for CST members regarding the development of transition plans. Additional activities must be identified to ensure consideration of student interests and preferences in relation to community experiences.

- The district is directed to revise its improvement plan to identify the procedures it will follow to ensure the effectiveness of the in-service by reviewing IEPs to determine whether a consideration of a variety of community experiences is included in the transition plan.

Student Invitations - During the on-site monitoring, interviews with district personnel indicate that the letter of invitation to the parent for an annual review conference is copied to the student when the purpose of the IEP meeting includes transition planning. A review of student files indicated that this documentation is not maintained on a consistent basis.

- The district is directed to revise its improvement plan to identify the procedures it will follow to ensure that documentation of student invitations to IEP meetings is consistently maintained in student files.

IEP Components - During the on-site monitoring, a review of student records indicated that the district has incorporated the state model for transition planning into the district IEP format. Further record review indicated that this section of the IEP was neither consistently completed nor filled out correctly when it was completed. Many of the IEPs reviewed did not include the statement of needed transition services and transition service needs, when required. In addition, student IEPs did not consistently document the consideration of the need for technical consultation with DVR.

- The district is directed to revise its improvement plan to identify the procedures it will follow to ensure that IEPs consistently include a statement of needed transition services and transition service needs, when required. The plan must further ensure the IEP documents the consideration of the need for technical consultation with the DVR, when required. In addition, the plan must identify activities to ensure that transition plans are accurately and completely documented in the IEP.

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Community Agencies - During the on-site monitoring, interviews with district personnel indicated that agencies are invited to IEP meetings, when appropriate. However, a review of records indicated documentation of this participation was not consistently maintained in student files. In addition, interviews indicated that the district does not consistently reconvene an IEP team if a participating agency fails to provide the services committed to in the transition plan.

- The district is directed to revise its improvement plan to identify the procedures it will follow to ensure that invitations to agency liaisons and all attempts to obtain their participation at meetings are consistently documented in student records. The plan must include a mechanism to ensure an IEP meeting is reconvened when the participating agency fails to provide services identified in the student's IEP.

Pre-school Transition - During the self-assessment process, the district identified an area of need regarding timely evaluations for children transitioning from Early Intervention Programs. The district's improvement plan indicates that additional CST members and clerical personnel are required in order to ensure timely evaluations. However, the plan does not include an oversight component to determine whether these activities do ensure compliance with this regulation.

- The district is directed to revise its improvement plan to identify oversight activities that will ensure the completion of evaluations for preschool-aged students in a timely manner.

XI. Discipline

Summary of Findings:

The district accurately assessed compliance regarding rates of suspension for classified students compared to non-disabled students and provision of FAPE beyond the 10th day of removal.

Areas of need were identified during the on-site monitoring regarding behavior intervention plans, suspension tracking, case manager notification, meeting participants for manifestation determination, written notice (addressed in Section III), functional behavioral assessments, and documentation of the determination of a significant change in placement.

Area(s) of Need:

Behavior Intervention Plans - During the on-site monitoring, a review of student IEPs indicated that behavior intervention plans are not consistently developed for students with a history of behavior problems.

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

Suspension Tracking - During the on-site monitoring, interviews with district administrators indicated that when students are suspended, district policy requires a parental conference prior

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to readmitting the student. If the parent fails to meet with school personnel at the conclusion of a period of suspension, the student cannot return to school. Though the student may not return to school, these additional days are not counted as removals.

- The district is directed to revise its improvement plan to identify the procedures it will follow to ensure it counts each day the student is removed from program or prohibited from attending school because a parent did not attend a reentry conference. The plan must include a mechanism to ensure that, in the event the parent does not attend the required reentry conference, and that failure results in the need to provide educational services, the district affords the student his/her procedural safeguard rights. It is recommended the district revise its current reentry policy to more effectively address the additional rights to receive educational services that are afforded to classified students.

Case Manager Notification - During the on-site monitoring, a review of student files indicated that case managers are not consistently notified when a student has been removed from his/her educational program.

- The district is directed to revise its improvement plan to identify the procedures it will follow to ensure that case managers are notified in writing when a student has been removed from his/her educational program.

Manifestation Determination Meeting Participants - During the on-site monitoring, a review of student files indicated that when manifestation determination meetings are conducted, the student's teacher(s) are not consistently in attendance.

- The district is directed to revise its improvement plan to identify the procedures it will follow to ensure that all the required participants attend manifestation determination meetings.

Functional Behavioral Assessments - During the on-site monitoring, a review of student records and interviews with district personnel indicated that functional behavior assessments are not conducted for students with documented behavioral issues.

- The district is directed to revise its improvement plan to identify the procedures it will follow to ensure functional behavior assessments are conducted, when required.

Determination of a Significant Change in Placement - During the on-site monitoring, a review of student records and interviews with district personnel indicated that the determination that a removal constitutes a change in placement is not documented in the student file. In addition, it was determined the district does not document the consultation between the student's teacher and the school's disciplinarian regarding the level of services required by the student when a series of removals does not constitute a significant change in placement but does exceed ten cumulative days.

- The district is directed to revise its improvement plan to identify the procedures it will follow to ensure that documentation is maintained regarding the decision-making process to determine the level of educational services the student will receive during the student's removal from program.

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XII. Statewide Assessment

Summary of Findings:

The district accurately assessed compliance regarding alternate assessments.

Areas of need were identified during on-site monitoring regarding identification of accommodations and modifications (addressed in Section VIII), and IEP documentation.

Area(s) of Need:

IEP Documentation - During on-site monitoring, a review of student IEPs indicated that documentation of participation in statewide assessments did not clearly identify whether students were participating in statewide assessments or district assessments or both. At the high school level, the page from the state model IEP that addresses participation in the HSPT was not included on a consistent basis.

- The district is directed to revise its improvement plan to identify the procedures it will follow to ensure the decision regarding participation in statewide assessments is clearly identified and documented in student IEPs.

XIII. Graduation

Summary of Findings:

The district accurately assessed compliance regarding student participation in graduation activities and written notice of graduation.

An area of need was identified during on-site monitoring regarding IEP documentation of graduation requirements.

Area(s) of Need:

IEP Documentation of Graduation Requirements - During the on-site monitoring, a review of student IEPs indicated the district is not identifying graduation requirements in their IEP on a consistent basis.

- The district is directed to revise its improvement plan to identify the procedures it will follow to ensure that graduation requirements are consistently addressed in the IEP for high school students.

XIV. Programs and Services

Summary of Findings:

The district accurately assessed compliance regarding age ranges, group size for speech therapy, provision of aides when required, and class size.

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Areas of need were identified during the on-site monitoring regarding provision of collaborative planning time for special and regular education teachers and substitute coverage for in-class support teachers.

Area(s) of Need:

Collaborative Planning Time - During the on-site monitoring, interviews with instructional staff members and administrators indicate that planning time for regular education and special education teachers is not consistently provided, particularly at the secondary level.

- The district is directed to revise their improvement plan to identify the procedures to ensure that special education teachers are provided time for consultation with general education teachers.

Substitute Coverage - During the on-site monitoring, interviews with staff members indicated that substitute coverage is not consistently provided for in-class support teachers. This occurs primarily at the high school level and results in a loss of service to classified pupils.

- The district is directed to revise its improvement plan to identify the procedures it will follow to ensure that in-class support services are provided in the event of teacher absences.

XV. Student Records

Summary of Findings:

The district accurately assessed compliance regarding maintaining a record of access to student files.

An area of need was identified during on-site monitoring regarding the documentation of the location of other student records.

Area(s) of Need:

Location of Student Records - During the on-site monitoring, a review of central files indicated that the location of other student records is not consistently identified.

- The district is directed to revise its improvement plan to identify the procedures it will follow to ensure that central files identify the location of all other student records.

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

SUMMARY

An on-site special education monitoring was conducted in the Jackson Township School District on January 8-12, 16 and 17, 2001. The purpose of the monitoring was to verify the district's report of findings resulting from self-assessment and to review the district's improvement plan. As a result of the review conducted by the district during the self-assessment process, the district was able to self-identify several areas that require improvement.

At a focus group meeting held prior to the visit, parents expressed satisfaction with many of the district's programs and services. Parents raised concerns regarding timelines for delivery of related services, staffing issues, placement in the least restrictive environment, and IEP issues.

Some unique and beneficial programs and/or practices were identified by the monitoring team during the on-site visit. These programs included: the National Service-Learning Leader Program; the "Wake Up McAuliffe" news program; an after-school-tutoring program for middle and high school students; the Great Thinking Machine Show; the vocational life skills program at the high school; and the C.A.R.E. program.

The on-site visit determined that the district employs appropriately certified personnel; provides procedural safeguards to parents as required; employs appropriate procedures for referral and Child Find; implements goals and objectives that are aligned with the Core Curriculum Content Standards; conducts annual reviews as required; completes initial evaluations within required timelines; provides for alternate assessments for students exempted from statewide assessments; and maintains classes that do not exceed age range or class size limits.

During the self-assessment process, the district identified areas of need regarding staff development; the need for an elementary adaptive PE program; procedures for selecting and training surrogate parents; provision of IEPs to parents prior to program implementation; and transition.

The on-site visit further identified areas of need within the various standards regarding staff development for in-class support at the high school; timely provision of related services; consideration of extended school year services; provision of notice in native language; timelines for provision of written notice; reevaluation timelines; teacher access to IEPs and implementation of IEPs; least restrictive environment for preschool students; individualized placement decisions; notification of opportunities for participation in nonacademic and extra-curricular activities; access to regular education programs; procedures for discipline; documentation of accommodations and modifications for statewide assessments; provision of collaborative planning time for teachers; and student records procedures.

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