

**NEW JERSEY DEPARTMENT OF EDUCATION  
SPECIAL EDUCATION MONITORING**

**District:** Millville School District

**County:** Cumberland

**Monitoring Dates:** April 27, 30, May 1, 2, 3, 2001

**Monitoring Team:** Caryl Carthew, Patricia Fair, Arlene Popovici, Ken Richards

**Background Information**

During the 2000 – 2001 school year, the Millville School District conducted a self-assessment of policies, procedures, programs, services and student outcomes. This self-assessment component of the monitoring process provided the Millville School District with an opportunity to evaluate its strengths 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 non-compliant with state and federal requirements. The Millville School District developed an improvement plan to address the identified areas of need.

The Office of Special Education Programs conducted an on-site monitoring visit to verify the district's report of findings and to address the appropriateness of the improvement plan and the progress made in implementing that plan.

As the first step in the on-site monitoring process, the New Jersey Department of Education held a public focus group meeting for parents and community members at the Lakeside Middle School on April 24, 2001. From this initial focus group meeting, areas were identified that would later be reviewed during the on-site visit. In addition to these areas, the 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 New Jersey Department of Education 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, building principals, and child study team members, including the speech-language specialist. Input was also received from parents of students with disabilities. In addition, seven of the district's school buildings were visited and both general and special education teachers from each school were interviewed.

District compliance with the requirements of the Individuals With Disabilities Education Act (IDEA) 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. Systemic areas of need are identified in the findings below.

## **I. GENERAL PROVISIONS**

### **Summary of Findings:**

The district accurately identified themselves compliant in the areas of providing access to public information and staff development.

During the self-assessment process, the district identified concerns regarding policies and procedures. The district's improvement plan is sufficient to address this issue.

## **II. F.A.P.E.**

### **Summary of Findings:**

The district accurately identified themselves compliant in the area of length of the school day and year.

During the self-assessment process, the district identified concerns regarding provision of related services, transfer procedures and out-of-district placements. The improvement plan needs to be revised to include an oversight component to ensure full implementation of procedures regarding the provision of related services, the procedures regarding transfer students, and the procedures regarding out-of-district issues.

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

### **Areas of Need:**

**Extended School Year** - During the on-site monitoring, interviews with staff and record review determined that discussion and consideration of the need for extended school year services does not consistently occur for all students.

- **The district will revise its improvement plan to include procedures to ensure that extended school year services are considered and discussed for all students. The plan must also include a mechanism to ensure these considerations are documented in the IEP.**

**Counseling** - During the on-site monitoring, interviews with staff and record review determined that counseling is not provided when needed. District personnel indicated that lack of sufficient staff impacts on the decision-making process regarding the

provision of counseling as a related service. Currently, the district provides counseling primarily on an as-needed basis.

- **The district will revise its improvement plan to include procedures to ensure that counseling is considered and provided to classified pupils when that service is determined appropriate by the IEP team. The plan must include a mechanism to ensure the district has an appropriate method to determine whether it has sufficient staff to provide these services. In the event it does not have sufficient staff, the plan must include a component that identifies how it will obtain the needed staff.**

**Facilities** - During the on-site monitoring, several dual-use classroom situations were identified. The district was unable to document county office approvals for these situations. In addition, it was observed that at the R.D. Wood Elementary School, a resource center program was conducted in the hallway. The county office has been notified of these facilities issues.

### **III. PROCEDURAL SAFEGUARDS**

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

The district accurately identified themselves compliant in the areas of surrogate parents, independent evaluations, timelines and native language.

During the self-assessment process the district identified concerns with notice. The district has developed an improvement plan that sufficiently addresses this area of need.

An additional area of need was identified during on-site monitoring regarding notice timelines.

#### **Areas of Need :**

**Written Notice Timelines** - During on-site monitoring and through record review it was determined that though notices are sent home, because they are not dated it cannot be determined whether they were sent home within 15-days of a meeting.

- **The district will revise its improvement plan to include procedures to ensure notice is provided within 15-days of a meeting. The plan must include a mechanism to ensure the date of the provision of notice is documented in the file.**

### **IV. LOCATION, REFERRAL, AND IDENTIFICATION**

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

The district accurately identified themselves compliant in the area of summer referrals.

During the self-assessment process, the district identified concerns with documentation of interventions of pre-referral interventions. The district has developed an improvement

plan that does not sufficiently address this issue because it lacks an oversight component. The plan must be revised to include that component.

Additional areas of need were identified during the on-site visit regarding the referral process, vision and hearing screenings and parental consent.

### **Areas of Need:**

**Referral Process** - On-site monitoring determined that though parents may directly refer a child to the child study team, district staff are not aware they have that right as well. Additionally, because PAC procedures are not being implemented on a consistent basis, in some schools the referral to the child study team is delayed even when general education interventions have not been effective.

- **The district will revise its improvement plan to ensure that staff have the ability to directly refer a student to the child study team and to participate in a meeting when they believe the nature of the student's problem is such that an evaluation is warranted without delay. At that meeting, a decision may be made that an evaluation is not warranted and that the student needs to be referred to the PAC. The plan must include an in-service component as well as an oversight component to ensure staff are aware of and fully implementing these procedures in a consistent manner throughout the district.**

**Parental Consent** - On-site monitoring determined that the district inappropriately requests parental consent before a referral to the child study team is made. If the parent does not consent to the referral, the process ends and the student is not referred.

- **The district will revise its improvement plan to include procedures to ensure that when it is believed a referral is required, district personnel forward that referral to the team. Within twenty-days of receipt of that referral, the parent will be invited to attend a meeting to determine whether an evaluation is required. At that time, the nature and scope of the evaluation will be determined and parental consent will be requested. In the event the parent refuses to consent to the evaluation, the process will end. The district is further directed to cease its practice of requiring an additional consent since this requirement may delay the process to identify and evaluate potentially disabled students.**

**Vision and Hearing** - During on-site monitoring it was determined that vision and hearing screenings are not obtained prior to the identification meeting for students suspected of having a disability in the areas of articulation, voice, and/or fluency.

- **The district will revise its improvement plan to include procedures to ensure that vision and hearing screenings are conducted for all students referred for an evaluation.**

#### IV. EVALUATION

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

The district accurately identified themselves compliant in the areas of multidisciplinary assessments, functional assessments and acceptance and rejection of reports.

During the self-assessment process, the district identified concerns with standardized assessments and written reports. The district has developed an improvement plan that sufficiently addresses these areas of need.

An additional area of need was identified during the on-site visit regarding bilingual evaluations.

**Bilingual Evaluations** - On-site monitoring determined that bilingual evaluations are not completed in a timely manner.

- **The district will revise its improvement plan to include procedures to ensure that bilingual evaluations are completed in a timely manner.**

#### VI. REEVALUATION

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

The district accurately assessed themselves compliant in the areas of planning meetings, meeting participants, consent, and reevaluations for students turning five.

During the self-assessment process, the district identified concerns with summer reevaluations. The district has developed an improvement plan that sufficiently addresses this area of need.

#### VII. ELIGIBILITY

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

The district accurately assessed themselves compliant in the areas of conducting meetings and meeting participants.

During the self-assessment process, the district identified concerns with written notice and criteria for eligibility. The district has developed an improvement plan that sufficiently addresses these areas of need.

An additional area of need was identified during the on-site monitoring regarding timelines for provision of written notice. This issue was addressed in Section III – Procedural Safeguards.

## VIII. IEP

### Summary of Findings:

The district accurately assessed themselves compliant in the areas of IEP components and considerations and required statements.

During the self-assessment process the district identified concerns with participants, goals and objectives aligned with core curricular content standards, staff responsibility for implementing the IEP, annual review timelines for out-of-district students and input from teaching staff regarding information about student progress in addressing IEP goals and objectives. The district has developed an improvement plan that sufficiently addresses goals and objectives aligned with core curricular content standards, input from teaching staff and informing teaching staff of their responsibility in implementing the IEP and annual review timelines.

Additional areas of need were identified during the on-site visit regarding notice (addressed in Section III), IEPs, reports on progress, speech IEPs and revisions to IEPs.

### **Areas of Need:**

**Participants** - During the self-assessment process, the district determined that vocational school staff do not consistently participate in IEP meetings. Although the district reports they have a form that vocational school teachers use to provide information regarding student progress, the district was unable to provide a copy of that form.

- **The district will revise their improvement plan to include procedures to ensure that vocational school teachers participate in IEP meetings and have the opportunity to provide input regarding student progress.**

**IEP** – During the on-site monitoring a review of records and staff interviews determined the district develops two IEPs for those students classified eligible for special education and related services and who are receiving speech as a related service. Additionally, a review of these different IEPs indicated there was a discrepancy between the two documents regarding the frequency and duration of speech services. Furthermore, staff indicated they conduct two separate annual review meetings – one for the program review and one for the review of the related service of speech.

- **The district will revise its improvement plan to include procedures to ensure that students determined eligible for special education and related services who also receive speech as a related service have one IEP that includes the program and all required related services. The plan must also include a mechanism to ensure the annual review is conducted with all required members of the IEP team, including the speech language therapist.**

**Speech IEP/Signature-** On-site monitoring and record review determined that one signature is used to indicate participation at a meeting and consent to implement the program.

- **The district will revise its improvement plan to include procedures to ensure signatures clearly identify whether they represent participation at a meeting or consent to a requested activity.**

**Revisions to IEPs** - On-site monitoring and record review indicated that changes are made to IEPs without conducting a meeting with all required team members.

- **The district will revise its improvement plan to include procedures to ensure that IEP meetings are conducted to revise any part of the student's program or services. The plan must include a component to ensure all required participants attend the meeting and that the parent is provided with appropriate written notice of any change(s) made to the IEP.**

**Reports of Progress** - On-site monitoring and record review indicated that reports on progress in the goals and objectives were not provided to parents on a consistent basis.

- **The district will revise its improvement plan to include procedures to ensure parents receive reports on progress in the mastery of goals and objectives. The plan must include an administrative oversight component to ensure the consistent implementation of these procedures.**

## **IX. LEAST RESTRICTIVE ENVIRONMENT**

### **Summary of Findings:**

The district accurately assessed themselves compliant in the areas of program considerations and documentation.

During the self-assessment the district identified concerns with regular education access and individual decision-making. The improvement plan is insufficient to address these areas of need.

Additional areas of need were identified during the on-site monitoring regarding continuum, considerations and documentation, nonacademic and extracurricular participation, and supplementary aides and services.

**Regular Education Access and Continuum-** During the self-assessment process the district determined that there is a need for increased opportunity for regular education access at the preschool level and secondary level. On-site monitoring determined that there is also a need to increase opportunities for classified self-contained students to be educated with their peers at the elementary level.

- **The district will revise its improvement plan to include procedures to ensure classified students at all levels have the opportunity to receive instruction in a general education setting with their nondisabled peers.**

**Individual Decision Making** - During the self-assessment process the district determined that the placement decision-making process depended on program availability and was not based on the individual needs of the student.

- **The district will revise its improvement plan to include procedures to ensure determinations regarding programs and services are based on the individual needs of students and not on the availability of programs within the district. The plan must include a component to ensure the district conducts a needs assessment to determine the need for additional program options on a district wide basis. If a need is identified the plan must further include the manner in which those programs will be developed and provided.**

**Nonacademic and Extracurricular Activities** - On-site monitoring, record review and staff interviews indicated the district does not ensure that students placed in out-of-district programs are invited to participate in district-run nonacademic and extracurricular activities.

- **The district will revise its improvement plan to include procedures to ensure that students who attend out-of-district programs have the opportunity to participate with their nondisabled peers in nonacademic and extracurricular activities.**

**Supplementary Aides and Services** - On-site monitoring, record review and interviews with staff determined that the district does not provide supports and services to ensure students with disabilities have the opportunity to receive educational services in regular education settings with their nondisabled peers.

- **The district will revise its improvement plan to include procedures to ensure the identification and provision of supports and services in the general education setting to afford classified students the opportunity to be educated with their nondisabled peers.**

## **X. TRANSITION**

### **Summary of Findings:**

The district accurately assessed themselves compliant in the areas of preschool transition planning conference, age 14 transition services needs and age 16 transition services needs.

During the self-assessment process, the district identified areas of need regarding transition to preschool disabled programs by age 3, IEP considerations and documentation and agency involvement. The district has developed an improvement plan that sufficiently addresses these areas.

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

## **XI. DISCIPLINE**

### **Summary of Findings**

The district accurately assessed compliance in the areas of procedures, suspension tracking, and Interim Alternative Education Settings.



Areas of need were identified during the on-site monitoring regarding notification of the case manager, manifestation determination meetings, behavioral intervention plans and functional behavioral assessments.

**Areas of Need:**

**Notification of Case Managers/Functional Behavior Assessments/ Behavior Intervention Plans/Manifestation Determination Meetings** – During on-site monitoring, record reviews and interviews with staff indicated case managers were not consistently notified when classified students were suspended. As a result, teams were not conducting FBAs and were not developing BIPS. Additionally, it was determined that because case managers are not consistently notified, meetings are not conducted to determine whether the behavior was a manifestation of the student’s disability.

- **The district will revise its improvement plan to include procedures that will ensure the case manager is notified, in writing, whenever a classified student is removed for disciplinary reasons. The plan must further ensure team members conduct FBAs and develop BIPs when required, and conduct meetings to determine whether the student’s behavior was a manifestation of the disability when the removal will constitute a change in placement. The plan must further include an administrative oversight component to ensure consistent and appropriate implementation of these procedures.**

**XII. STATEWIDE ASSESSMENT**

**Summary of Findings:**

The district accurately assessed themselves compliant in the area of IEP documentation.

During the self-assessment process, the district identified concerns with participation in statewide assessments and alternative assessments. The district has developed an improvement plan that will sufficiently address these areas.

An additional area of need was identified during the on-site visit regarding accommodations and modifications.

**Areas of Need:**

**Accommodations and Modifications** – During on-site monitoring it was determined that though modifications and accommodations were identified in IEPs, because staff were not aware of their inclusion, students were not being afforded these accommodations and modifications.

- **The district will revise its improvement plan to include procedures to ensure staff are aware of and provide the modifications and accommodations identified in student IEPs.**

### **XIII. GRADUATION**

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

The district accurately assessed compliance in the areas of IEP requirements, written notice of graduation and diplomas.

During the self-assessment process the district-identified concerns with participation in graduation activities. The district has developed an improvement plan that sufficiently addresses this area of need.

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

### **XIV. PROGRAM AND SERVICES**

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

The district accurately assessed themselves compliant in the areas of age range, aides, speech group sizes, home instruction and certifications.

During the self-assessment process the district identified concerns with the need for additional child study teams, speech and language specialists, and special education staff at the secondary level. The district has developed an improvement plan that is sufficient to address this area of need.

An additional area of need was identified during the on-site visit regarding class size.

#### **Areas of Need:**

**Class Size** - A review of class lists and classroom observations indicated that instructional group sizes for in-class support programs exceed that which is required by code.

- **The district will revise its improvement plan to include procedures to ensure that in-class support classes do not exceed the maximum number of students allowed by code. The plan must include an oversight component to ensure consistent implementation of these procedures throughout the school year.**

### **XV. STUDENT RECORDS**

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

The district accurately assessed themselves compliant in the areas of access and destruction of records.

During the self-assessment process, the district identified areas of need regarding maintenance of records. The improvement plan needs to be revised to include an oversight component to ensure consistent implementation of these procedures.

An additional area of need was identified during the on-site visit regarding documentation of the location of records.

**Areas of Need:**

**Documentation of Location of Records** - On-site record review determined that central files do not document the location of other student files maintained by the district.

- **The district will revise its improvement plan to include procedures to ensure that central files document the location of other student records maintained by the district.**

## **SUMMARY**

An on-site special education monitoring was conducted in the Millville School District on April 27, 30, May 1, 2, 3, 2001. The purpose of the monitoring was to verify the district's report of findings resulting from self-assessment and review the district's improvement plan. The district should be commended for the thorough and comprehensive review it conducted during the self-assessment process. As a result of the review, the district was able to self-identify many of the areas that require improvement as well as develop a comprehensive improvement plan that with some revision should result in systemic change.

At the focus group meeting held prior to the monitoring visit, parents expressed their satisfaction with many of the district's programs and services. In addition, many of the concerns raised by the parents had already been identified and addressed by the district during the self-assessment process.

During the self-assessment process, the district identified areas of need regarding policies and procedures; provision of related services; transfer procedures and out-of-district placement; notice of graduation and age of majority; documentation of interventions and summary of pre-referral interventions; standardized assessments and written reports; summer reevaluations; participants at meetings; goals and objectives; staff responsibility for implementing IEP; annual review timelines for out-of-district students; input from teaching staff; regular education access; individual decision-making; EIP to preschool by age three; considerations and documentations; agency involvement; discipline; participation in statewide assessment and alternative assessments; programs and services and student records.

The on-site visit further identified areas of need within various standards regarding extended school year, counseling and facilities; timelines and notices; referral process; bilingual evaluations; summer reevaluations; IEP; least restrictive environment; access to general education; discipline procedures; accommodations and modifications and student records.

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