

New Jersey Department of Education Special Education Monitoring

District: Mount Holly Township School District

County: Burlington

Monitoring Dates: January 24 and 26, 2006

Monitoring Team: Kenneth Richards, Julia Harmelin and Robert Schweitzer

Background Information:

During the 2004–2005 school year, the Mount Holly 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 Mount Holly Township School District with an opportunity to evaluate 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 Mount Holly 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.

During the on-site visit, the New Jersey Department of Education (NJDOE) monitoring team reviewed district documents, 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. A representative sample of student records was also reviewed. Interviews were conducted with the district's special education administrator, building principals, general education and special education teachers, speech-language specialists and child study team members. Parents of students with disabilities were interviewed by phone.

Data Summary:

A review of the district's data indicates that during the 2005 - 2006 school year, the district educated 18.1% of students with disabilities between the ages of 6-21 in the general education setting for more than 80% of the school day. This rate is significantly lower than the state rate of 42% for that year. During the same school year, 8.3% of preschool age students with disabilities were educated in a general education setting as compared to the state average of 11.2%. During the self assessment process, the district identified concern in the areas of general education access, continuum and individual decision making for both preschool and school-aged students with disabilities. The district has submitted improvement plan activities to address these areas. The district's classification rate of 24.37% was significantly higher than the state rate of 14.85% for the 2005-2006 school year. The district identified a concern regarding classification rate and submitted improvement plan activities to address this area of need.

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Areas not Applicable

The age 16 IEP statement of needed transition services, activities, annual goals and benchmarks related to students' desired outcomes, identification of post-secondary liaison, out-of-district student participation in graduation activities and written notice of graduation were areas not reviewed by the New Jersey Department of Education (NJDOE) because the district does not serve a population of students for whom these regulations apply.

Sections Demonstrating Compliance with All Standards

The self-assessment process required the district to review implementation of federal and state regulations categorized into 15 sections. Within each section, a number of areas were reviewed. The on-site monitoring visit involved verification that the sections and areas identified as compliant by the district in their self-assessment were compliant with regulations. These sections were identified by the district during self-assessment and the NJDOE during the monitoring process as compliant:

- Transition to Preschool
- Discipline

Areas Demonstrating Compliance

The following areas, within the 15 sections reviewed, were identified by the district's self-assessment committee and by the Department of Education as compliant. These areas were reviewed for students eligible for special education and related services (ESERS) and students eligible for speech and language services (ESLS). Areas compliant for only one group of students are noted.

Section	Areas Demonstrating Compliance
Free, Appropriate Public Education (FAPE)	<ul style="list-style-type: none"> • Oversight of individualized education program (IEP) implementation • Provision of programs • Transfer procedures
Procedural Safeguards	<ul style="list-style-type: none"> • Consent • Implementation without undue delay • Content of notice of meeting (ESLS) • Provision of notice of a meeting • Meetings • Content of written notice • Interpreters at meeting • Independent evaluations
Location, Referral and Identification (LRI)	<ul style="list-style-type: none"> • Child Find Ages 3-21 • Referral process • Pre-referral interventions • Direct referrals • Health summary • Vision and hearing screenings

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Section	Areas Demonstrating Compliance
	<ul style="list-style-type: none"> • Identification meeting timelines (ESERS) • Identification meeting participants
Evaluation	<ul style="list-style-type: none"> • Multi-disciplinary evaluations • Standardized assessments • Functional assessments (ESERS) • Bilingual evaluations • Written reports prepared by evaluators
Reevaluation	<ul style="list-style-type: none"> • Reevaluation when a change of eligibility is considered • Timelines • Planning meeting participants • Procedures when parental consent cannot be obtained • Documentation of efforts to obtain parental consent
Eligibility	<ul style="list-style-type: none"> • Meeting participants • Signature of agreement and/or disagreement and rationale • Copy of evaluation reports to parents (ESERS)
Individualized Education Program (IEP)	<ul style="list-style-type: none"> • Meeting participants (ESLS) • IEP required considerations and components • Implementation dates • IEP provided to parent prior to implementation • Meetings held annually, or more often if necessary, to review and/or revise the IEP • Annual reviews completed by June 30 • 90-day timelines
Least Restrictive Environment (LRE)	<ul style="list-style-type: none"> • Documentation of LRE decisions
Statewide Assessments	<ul style="list-style-type: none"> • Participation documented in IEPs
Graduation	<ul style="list-style-type: none"> • IEP requirements
Programs & Services	<ul style="list-style-type: none"> • Age range • Group size

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Areas of Noncompliance - Improvement Plan Review

The following areas were identified by the district's self-assessment committee as noncompliant. The table includes the results of the review of the district's improvement plan and identifies those areas where correction of noncompliance was verified during the on-site visit.

Section	Area	Compliance Review
General Provisions	<ul style="list-style-type: none"> ▪ Parent training – The district identified the need for parent training regarding special education rules and regulations, district policies and procedures and related topics of interest in special education. 	Improvement plan is sufficient
Free Appropriate Public Education	<ul style="list-style-type: none"> ▪ Provision of related services –Related services are not provided based on the implementation dates identified in the IEP. Services may begin later and end earlier due to scheduling conflicts. 	The district's improvement plan is insufficient because activities did not result in compliance by the projected timeline. The district is directed to ensure the provision of related services according to IEPs within one month of this report. The district must implement an administrative oversight mechanism to ensure correction and ongoing compliance.
Procedural Safeguards	<ul style="list-style-type: none"> ▪ Notices in native language – The district does not provide notice of meetings and written notices in the native language of the parent. 	The district's improvement plan is insufficient because activities did not result in compliance by the projected timeline. The district is directed to ensure the provision of notice of a meeting and written notice in the native language of the parent as required. The district must implement an administrative oversight mechanism to ensure correction and ongoing compliance.
IEP	<ul style="list-style-type: none"> ▪ Teachers informed of their responsibilities (knowledge of and/or access to IEPs) – The district lacked a procedure to distribute IEPs to staff in a timely manner. 	The district demonstrated compliance in this area.

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Section	Area	Compliance Review
LRE	<ul style="list-style-type: none"> ▪ Notification and participation in non-academic and extra curricular activities for students educated outside the district – The district was not aware of the requirement to notify students receiving services outside the district of the opportunities available for participation in non-academic and extracurricular activities. ▪ Opportunity for all students with disabilities to access all general education programs, continuum of programs and placement decisions based on students' individual needs - The district indicated that scheduling constraints prevent a lack of sufficient staff to accommodate students in the least restrictive environment including in-class support. 	<p>The district demonstrated compliance in this area.</p> <p>The district's improvement plan is insufficient because corrective action did not result in compliance by the projected timeline. The district must implement activities to correct noncompliance within one year of the date of this report. The district must implement an administrative oversight mechanism to ensure correction and ongoing compliance.</p>
Transition to Adult Life	<ul style="list-style-type: none"> ▪ Student and agency invitation to IEP meetings – The district indicated that students age 14 and older were not invited to meetings when transition services were discussed and developed. 	<p>The district demonstrated compliance in this area.</p>
Statewide Assessment	<ul style="list-style-type: none"> ▪ Approved accommodations and modifications documented in IEPs – The district indicated that child study team members lacked knowledge regarding documentation of approved accommodations and modifications in the IEP. 	<p>The district demonstrated compliance in this area.</p>
Programs and Services	<ul style="list-style-type: none"> ▪ Class Size – The district indicated that resource class size exceeds code requirements due to a high rate of student mobility and budget constraints. 	<p>The district demonstrated compliance in this area.</p>

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Section	Area	Compliance Review
	<ul style="list-style-type: none"><li data-bbox="516 262 938 424">▪ Common Planning Time – The district indicated that adequate common planning time was not provided due to scheduling constraints.	The district demonstrated compliance in this area.

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Additional Areas of Need

The following areas were originally identified by the district's self-assessment committee as compliant, but were found to be noncompliant by the NJDOE during the on-site monitoring:

Section	Area	Activity
Free Appropriate Public Education	Extended School Year – Documentation of extended school year in the IEP does not include a description and beginning and ending dates for the program.	The district is directed to ensure that all required components for the extended school year program are documented in the IEP. Improvement activities must include in-service and the district must implement an administrative oversight mechanism to ensure correction and ongoing compliance.
Procedural Safeguards	<p>Content of notice of a meeting (ESERS) - Notice of meeting for students eligible for special education and related services does not identify that transition planning will be discussed as part of an IEP meeting for students turning 14.</p> <p>Provision of written notice - Parents are not consistently provided with a copy of the due process hearing rules with written notice of an identification meeting.</p>	<p>The district is directed to ensure that notice of meeting identifies when transition planning will be discussed. Improvement activities must include in-service and the district must implement an administrative oversight mechanism to ensure correction and ongoing compliance.</p> <p>The district is directed to ensure that parents are provided with a copy of the due process hearing rules with written notice of the identification meeting. Improvement activities must include in-service and the district must implement an administrative oversight mechanism to ensure correction and ongoing compliance.</p>

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Section	Area	Activity
LRI	<p>Identification meeting timelines (ESLS) – When a staff member refers a student for a speech and language evaluation, an identification meeting is not held within 20 days. The speech-language specialist first observes the student and, based on the results of this observation, determines if the referral is warranted and if there is need to proceed with an identification meeting.</p>	<p>The district is directed to ensure that an identification meeting is conducted within 20 days of any referral for speech and language services with the required participants. Improvement activities must include in-service to ensure that all relevant information is considered and that all required participants, including the referring teacher and parent, are provided opportunity to have input into the decision making process pertaining to the need to conduct an evaluation. The district must implement an administrative oversight mechanism to ensure correction and ongoing compliance.</p>
Evaluation	<p>Educational impact statement (ESLS) - The educational impact statement provided by the student’s teacher as part of a speech and language evaluation is not documented in the speech-language report.</p> <p>Functional assessments (ESLS) – Functional assessments for speech-language evaluations do not consistently include a parent interview, teacher interview, review of educational history and a review of interventions.</p>	<p>The district is directed to ensure that the educational impact statement provided by the student’s teacher is documented in the speech-language evaluation report. Improvement activities must include in-service and the district must implement an administrative oversight mechanism to ensure correction and ongoing compliance.</p> <p>The district is directed to implement activities to ensure that required functional assessments are conducted for students evaluated for speech-language services. The district is advised to refer to the speech-language evaluation template available at www.state.nj.us/education for use for initial evaluations. Improvement activities must include in-service to ensure that sufficient information is available for determining eligibility for speech and language services. The district must implement an administrative oversight mechanism to ensure correction and ongoing compliance.</p>

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Section	Area	Activity
Reevaluation	Reevaluations prior to age 5 - The district does not consistently reevaluate students classified under the category of preschool disabled prior to June 30 of the year in which the student turns age 5.	The district is directed to ensure that students classified under the category of preschool disabled are reevaluated prior to June 30 of the year in which the student turns age 5. Improvement activities must include in-service and the district must implement an administrative oversight mechanism to ensure correction and ongoing compliance.
Eligibility	<p>Eligibility criteria – Eligibility criteria is not consistently documented when students are determined eligible for special education and related services.</p> <p>Copy of evaluation reports to parents (ESLS) - For students evaluated for speech-language services, a copy of the evaluation report is not consistently provided to parents at least 10 days prior to eligibility meetings.</p> <p>Statement of eligibility (Specific Learning Disability) – The statement of eligibility does not consistently document the discrepancy between the student’s current achievement and intellectual ability.</p>	<p>The district is directed to ensure that eligibility criteria are used when determining eligibility. Improvement activities must include in-service and the district must implement an administrative oversight mechanism to ensure correction and ongoing compliance.</p> <p>The district is directed to ensure that parents receive copies of the evaluation reports at least 10 days prior to eligibility meetings. Improvement activities must include in-service and the district must implement an administrative oversight mechanism to ensure correction and ongoing compliance.</p> <p>The district is directed to implement activities to ensure that the statement of eligibility for a specific learning disability documents the discrepancy between the student’s current achievement and intellectual ability. Improvement activities must include in-service to ensure that students are determined eligible for services only when criteria are met. The district must implement an administrative oversight mechanism to ensure correction and ongoing compliance.</p>

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Section	Area	Activity
IEP	Beginning at age 14, IEP statement of transition service needs – A course of study is not consistently documented in the IEP for students who will turn 14 during the timeframe of the IEP.	The district is directed to ensure that a course of study is documented in each IEP beginning with the IEP for the year in which the student will turn 14. Improvement activities must include in-service to ensure that all required participants are documented and that the course of study relates to the student's interests and preferences. The district must implement an administrative oversight mechanism to ensure correction and ongoing compliance.

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Summary

On-site special education monitoring was conducted in the Mount Holly Township School District on January 24 and 26, 2006. The purpose of the monitoring visit was to verify the district's report of findings resulting from their self-assessment and to review the district's improvement plan. The district is acknowledged for the comprehensive review conducted during the self-assessment process. As a result of that review, the district was able to identify nearly all areas of need. The district is further acknowledged for the many areas determined by the district and verified by the Office of Special Education Programs as compliant with federal and state statutes and regulations.

A review of the district's data indicates that during the 2005 - 2006 school year, the district educated 18.1% of students with disabilities between the ages of 6-21 in the general education setting for more than 80% of the school day. This rate is significantly lower than the state rate of 42% for that year. During the same school year, 8.3% of preschool age students with disabilities were educated in a general education setting as compared to the state average of 11.2%. During the self assessment process, the district identified concern in the areas of general education access, continuum and individual decision making for both preschool and school-aged students with disabilities. The district has submitted improvement plan activities to address these areas. The district's classification rate of 24.37% was significantly higher than the state rate of 14.85% for the 2005-2006 school year. The district identified a concern regarding classification rate and submitted improvement plan activities to address this area of need.

During interviews conducted with parents by phone, parents expressed their satisfaction with the district's programs, services and staff. Parents stated that programs are developed to meet the needs of their children and that programming begins promptly in the beginning of the school year. Parents reported that evaluations are conducted in a timely manner. Parents indicated that their children were demonstrating progress in achieving the goals and objectives identified in their children's IEPs.

Standards identified as consistently compliant by the district during self-assessment and verified during the on-site monitoring visit included:

- Transition to Preschool
- Discipline

Areas identified as consistently compliant by the district during self-assessment and verified during the on-site monitoring visit include:

- Oversight of individualized education program (IEP) implementation
- Provision of programs
- Transfer procedures
- Consent
- Implementation without undue delay
- Provision of notice of a meeting
- Content of notice of a meeting (ESLS)
- Meetings
- Content of written notice
- Interpreters at meeting
- Independent evaluations
- Child Find Ages 3-21
- Referral process
- Pre-referral interventions
- Direct referrals
- Health summary
- Vision and hearing screenings
- Identification meeting timelines (ESERS)
- Identification meeting participants
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- Functional assessments (ESERS)
- Bilingual evaluations
- Written reports prepared by evaluators
- Reevaluation when change of eligibility is considered
- Reevaluation timelines
- Reevaluation planning meeting participants
- Procedures when parental consent cannot be obtained
- Documentation of efforts to obtain parental consent
- Eligibility meeting participants
- Signature of agreement and/or disagreement and rationale
- Copy of evaluation reports to parents (ESERS)
- IEP required considerations and components
- IEP meeting participants (ESLS)
- IEP implementation dates
- IEP provided to parent prior to implementation
- IEP meetings held annually, or more often if necessary, to review and/or revise the IEP
- Annual reviews completed by June 30
- 90-day timelines
- Documentation of LRE decisions
- Activities, annual goals and benchmarks related to the student's desired outcomes
- Statewide assessment participation documented in IEPs
- IEP requirements for graduation
- Age range
- Group size

Areas of need originally identified by the district, but determined to have been corrected prior to the on-site monitoring visit by the NJDOE, include:

- Teachers informed of their responsibilities (knowledge of and/or access to IEPs)
- Notification and participation in non-academic and extra curricular activities for students educated outside the district
- Student and agency invitation to IEP meetings
- Approved accommodations and modifications documented in IEPs as appropriate
- Class size
- Common planning time

During the self-assessment process, the district identified areas of need regarding:

- Parent training
- Provision of related services
- Notices in native language
- Opportunity for all students with disabilities to access all general education programs
- Continuum of programs
- Placement decisions based on student's individual needs

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The on-site visit identified additional areas of need within the various standards, regarding:

- Extended school year
- Content of notice of meeting (ESERS)
- Provision of written notice
- Identification meeting timelines (ESLS)
- Educational Impact Statement (ESLS)
- Functional Assessments (ESLS)
- Reevaluations prior to age 5
- Eligibility criteria
- Copy of evaluation reports to parents (ESLS)
- Statement of eligibility (Specific Learning Disability)
- Beginning at age 14, IEP statement of transition service needs

The improvement plan submitted to the Office of Special Education Programs has been approved. The district is expected to implement the activities described in the monitoring report to achieve compliance in all of the areas of need identified during self-assessment, and areas of need identified during the on-site visit, within six months of the date of this report unless otherwise specified in the report. Verification of compliance will be conducted by the County Office of Education.