

- B. **Project S.T.E.P.** – Special Transitional Education Program at North Bergen High School.
- C. **Suicide Prevention and Grief Counseling**
- D. **Peer Mediation and Non-Violent Conflict Resolution Training**
- E. **Phonemic Awareness Program** – a language program designed to give children and understanding of the internal structure of words.

Areas Demonstrating Compliance with Requirements

Of the fifteen (15) areas reviewed during the on-site monitoring visit, it was determined that the district has met the requirements in the area of **Reevaluation**.

Areas Demonstrating Need

Of the fifteen (15) areas reviewed during the on-site monitoring visit, it was determined that the district needs to address areas within the following sections.

Section I: General Provisions

Summary of Findings:

The district board of education ensures that it provides publicly funded educational programs and services to students with disabilities in accordance with federal and state regulations. The district recently revised their policies to reflect changes since the adoption of N.J.A.C. 6A:14. Amendments to required policies, procedures and programs are made in accordance with State procedures.

Annually, the district submits the required reports related to the number of students with disabilities enrolled in the district; staff (including contracted personnel) providing services to students with disabilities; and the number of students with disabilities who are exiting education. The district makes available to parents of students with disabilities and to the general public all documents relating to the eligibility of the district under Part B of the IDEA.

However, problems were identified with meeting the inservice training needs for paraprofessional staff.

Areas of Need:

Inservice Training Needs for Paraprofessionals - Although the district has identified the training needs of professional staff providing special education services, the inservice needs of paraprofessional staff have not been identified. Parents also expressed concerns at the public focus group meeting about the lack of training for paraprofessionals.

- **The district will develop an improvement plan that will ensure that the inservice needs for both professional and paraprofessional staff who provide special education, general education or related services are identified and that appropriate inservice training is provided.**

Section II: Free, Appropriate Public Education

Summary of Findings:

The district provides special education and related services to students with disabilities age three to twenty-one at public expense, under public supervision, and with no charge to the parent. Programs are administered, supervised, and provided by appropriately certified and/or licensed professional staff members. The length of the school day and the academic year is at least as long as that established for nondisabled students. Transportation for students in out-of-district placements is provided consistent with the calendar in the receiving school. Transfer students with disabilities are provided the services without delay, according to their IEP.

However, problems were identified in the provision of FAPE regarding students placed in approved facilities, extended school year programs, and related services.

Areas of Need:

Approved Facilities/Classrooms – During the public meeting with parents from the district, concerns were expressed about the facilities being used for instructional space. Parents reported that resource room instruction was being provided in school cafeterias. This was disturbing to parents as this location was highly distractible for their children, who were identified as needing an environment that would not be distractible.

During the onsite visit to the schools, instructional spaces within two elementary schools were found to be inappropriate regarding square footage requirements. In Lincoln School, the resource rooms were identified as being substandard regarding square footage. In Horace Mann School, the resource room was also identified as being substandard. In addition, a standard-size classroom across the hall was being used by two classes simultaneously without any room dividers. In both McKinley and Kennedy Schools, resource room instruction was provided in the school cafeteria.

The Director of Special Services and Superintendent of Schools indicated that the district was under emergency conditions regarding space, and that the County Office of Education had granted approval for the use of these substandard classrooms. However, upon consultation with the Hudson County Office of Education, there was no record of approval granted for these rooms for the 1999–2000 academic year.

- **The district will develop an improvement plan that will ensure that students with disabilities are educated in classrooms that are approved by the Department of Education.**

Extended School Year – The IEPs reviewed contained documentation that extended school year services were considered. According to the record review, the need for an extended school year was based on a review of progress and regression and recoupment following school holidays and summer vacation. Interviews with the child study teams indicated that student progress was reviewed. However, instructional staff and parents indicated that the consideration of an extended school year was not discussed at IEP meetings for all students. Additionally, some of the instructional staff did not understand the term extended school year.

The child study team reported there is a summer program for some disabled students located at Lincoln Elementary School. Interviews indicated that this summer program might meet the extended school year needs of some students. However, the program does not meet the individual needs of all students.

- **The district will develop an improvement plan that will ensure extended school year services are considered on an individual basis for each classified student in the district, document those considerations in the IEP, and provide the services as needed.**

Related Services – A review of records and interviews indicated that the district provides a range of related services to students with disabilities, when required for the student to benefit from the educational program. The district contracts with approved private agencies to provide physical therapy and occupational therapy as well as a variety of counseling services. Additionally, several counseling and prevention programs have been implemented throughout the district.

Problems were identified with the documentation and provision of speech/language therapy. IEPs that reflected speech/language therapy as a related service did not consistently document whether it was group or individual sessions. This was evident in IEPs reviewed for students throughout the district.

All of the IEPs reviewed for preschool children included speech therapy; however, individualized determination of the need for speech therapy was not documented. Interviews indicated that speech/language instruction was provided to the entire class as part of the preschool program. Interviews with the speech language therapists indicated that this in-class speech/language instruction provided to all of the children in the class at the same time represented a group speech session. While it is permissible for students to receive speech/language instruction as part of the program, this instruction would not meet the related service provision as described within the student's IEP. The group size for speech services is limited to a maximum of five students.

- **The district will develop an improvement plan that will ensure that the provision of related services are based on the individual needs of students and are not dependent on programmatic decisions. This improvement plan must include a component that will address the provision of speech/language therapy to students within the correct group sizes.**

- **The district will develop an improvement plan that will ensure that IEPs will document the determination regarding the need for individual or group services for students receiving speech/language therapy as a related service.**

Section III: Procedural Safeguards

Summary of Findings:

The district has policies and procedures in effect to ensure students with disabilities and their parents are afforded procedural safeguards. The district obtains consent prior to conducting any initial evaluation, implementing the initial IEP, conducting any reevaluation, and releasing student records. In addition, the district implements without undue delay the action for which consent was granted.

Although the district has proper procedures for providing notice and written notice, records lacked documentation that notice of the identification meeting was provided to parents when students were referred for a speech disorder in articulation, phonology, fluency, or voice. In addition, problems were identified in the IEP components for the provision of written notice. Problems were also identified with informing parents and students that all rights will transfer to the student on reaching the age of majority, at least one year before the student reaches age eighteen.

Area(s) of Need:

Notice of the Identification Meeting – Information obtained through the interview process and a review of documentation in student records indicated that the district conducts an identification meeting when students are referred for a speech disorder in articulation, phonology, fluency, or voice. However, notices of identification meetings were not maintained in student records.

- **The district will develop an improvement plan that will ensure notice of the identification meeting is provided to the parent when a student is referred for a speech disorder in articulation, phonology, fluency, or voice and, that a copy of the notice is maintained in the student file.**

Written Notice Requirements for the IEP – The district provides copies of the IEP to parents with a standard cover letter. The letter, developed in January of

1999, indicates that the short procedural safeguards statement is also included. However, neither the IEP document nor the standard cover letter includes the following required components of written notice for the IEP:

- a description of the proposed action and explanation why the district took such action;
 - a description of any options considered and the reason those options were rejected; and
 - a description of any other factors that are relevant to the proposed action, if applicable.
- **The district will develop an improvement plan that will ensure that the written notice requirements for the IEP contain the required components.**

Age of Majority – A review of student records of students ages sixteen and one half and older did not reflect that the parent or student had been informed that all rights will transfer to the student on reaching the age of majority. Although the IEP document contained a statement regarding the Age of Majority, with an area for parent and student signature indicating that they had been informed of the transfer of rights, the documents reviewed did not contain signatures.

- **The district will develop an improvement plan that will ensure that parents and students will be informed that all rights will transfer to the student on reaching the age of majority, at least one year before the student reaches age eighteen. The improvement plan must include a component that documents this activity.**

Section IV: Location / Referral / Identification

Summary of Findings:

The district board of education has written procedures for students ages 3 to 21, to locate, refer and evaluate students. The school district provides interventions in general education programs to alleviate the student's educational problems. Written documentation has been maintained and verified through interviews that identification meetings are held within the required 20 day period. However, problems were identified regarding documentation of hearing and vision screenings.

Areas of Need:

Hearing and Vision Screening – Information obtained through the interview process indicated that hearing and vision screenings were done upon referral to the pupil assistance committee (PAC). However, a review of student records indicated that the hearing and vision screening information was not included in the PAC referral packet. The referral form to the child study team has only a check mark indicating the hearing and vision screening is to be done, often with a comment indicating "evaluation forthcoming".

- **The district will develop an improvement plan that will ensure all students referred for evaluation are screened for hearing and vision. Additionally, the plan will include a procedure to ensure documentation of the results of the hearing and vision screening is maintained in the student file.**

Section V: Protection in Evaluation and Evaluation Procedures

Summary of Findings:

The district ensures that evaluation procedures are technically sound, are neither culturally nor racially discriminatory, and are administered by trained personnel. When it is determined an evaluation by the child study team is warranted, the district ensures that students with disabilities receive a comprehensive evaluation conducted by a multi-disciplinary team of professionals who utilize a variety of assessment tools and strategies to assess the student in all areas of suspected disability.

Problems were identified, however, with evaluation procedures used to determine students' eligibility for speech-language services. In addition, written reports prepared by child study team members and speech-language specialists lacked documentation of specific evaluation requirements. Furthermore, student records did not consistently include documentation of the IEP team's acceptance or rejection of reports and assessments submitted by outside child study team members, specialists, or professionals.

Area(s) of Need:

Speech-Language Evaluation Procedures –

A. Information obtained through the interview process indicated that when students were referred for a speech disorder in articulation, fluency, or voice speech-language specialists conducted structured observations. However, documentation in student records reflected these observations were frequently conducted prior to obtaining parental consent for an initial speech-language evaluation. Once parental consent was obtained, speech-language specialists did not consistently conduct a structured observation in other than a testing session as part of a functional assessment of academic performance and, where appropriate, behavior.

- **The district will develop an improvement plan that will ensure that an evaluation conducted by the speech-language specialist to determine a student's eligibility for speech-language services includes a structured observation as part of functional assessment of academic performance and where appropriate, behavior. The plan will include a component to ensure that the structured observation is conducted after receipt of informed parental consent.**

B. A review of test protocols in student files indicated that speech-language specialists used standardized tests that were individually administered, valid and reliable, and normed on a representative population. However, due to the fact that evaluation reports were not evident in several of the student records reviewed, the monitoring team could not verify whether speech-language evaluations included documentation of the educational impact of the speech problem provided by the student's teacher, as well as the required components of functional assessment.

- **The district will develop an improvement plan that will ensure an initial evaluation to determine a student's eligibility for speech-languages services includes assessments by the speech-language specialist and documentation of the educational impact of the speech problem provided by the student's teacher. This will meet the requirements for a multi-disciplinary team evaluation.**
- **The district will develop an improvement plan that will ensure an evaluation to determine a student's eligibility for speech-language services includes all the components of functional assessment of academic performance and, where appropriate, behavior.**

Child Study Team Written Reports - Written reports prepared by child study team members included an appraisal of the student's current functioning. However, written reports did not consistently include each of the components of a functional assessment of academic performance and, where appropriate, behavior. Additionally, written reports did not include an analysis of instructional implications appropriate to the professional discipline of the evaluator; a statement regarding relevant behavior of the student, and the relationship of that behavior to the student's academic functioning.

- **The district will develop an improvement plan that will ensure written reports prepared by child study team members include:**
 - a. **The required components of a functional assessment of academic performance and where appropriate, behavior;**
 - b. **An analysis of instructional implications appropriate to the professional discipline of the evaluator; and**
 - c. **A statement regarding relevant behavior of the student, either reported or observed, and the relationship of that behavior to the student's academic functioning.**

Speech-Language Written Reports – A review of records of students evaluated and determined eligible for speech-language services indicated that, in several cases, written reports of the results of speech-language evaluations were not maintained in the files. Instead, record review indicated that results of speech-language evaluations were summarized in the IEPs of students determined eligible for speech-language services.

- **The district will develop an improvement plan that will ensure the speech-language specialist prepares a written report of the results of the evaluation, and that these reports are maintained in student files.**
- **The district will develop an improvement plan that will ensure each written report prepared by the speech-language specialist is dated and signed by the individual(s) who conducted the assessment and includes:**
 - a. **The required components of functional assessment of academic performance and where appropriate, behavior;**
 - b. **An appraisal of the student's current functioning and an analysis of instructional implication(s) appropriate to the professional discipline of the evaluator; and**

- c. **A statement regarding relevant behavior of the student, either reported or observed and the relationship of that behavior to the student's academic functioning.**

Outside Reports and Assessments – Information obtained through the interview process and record review indicated that although the district has a procedure to provide for the IEP team's acceptance or rejection of reports and assessments submitted by outside CST members, specialists, or professionals, this procedure is not consistently implemented.

- **The district will develop an improvement plan that will ensure that when reports and assessments of child study team members or specialists from other public education agencies, approved clinics or agencies, or professionals in private practice are submitted to the IEP team for consideration:**
 - a. **the IEP team accepts or rejects the entire report(s) or any part of the report(s);**
 - b. **acceptance of the report shall be noted in writing and shall become part of the report(s) of the district; and,**
 - c. **if a report or part of a report is rejected, a written rationale shall be provided to the parent or adult student by the IEP team.**

Section VII: Eligibility

Summary of Findings:

The district ensures that a student is determined eligible and classified "eligible for special education and related services" when the student has one or more of the disabilities defined in N.J.A.C. 6A:14-3.5(c) 1 through 13, the disability adversely affects the student's educational performance, and the student is in need of special education and related services. The district also ensures that students are determined eligible and classified "eligible for speech-language services" when the student has a speech-language disorder that adversely affects classroom performance and the student requires only speech-language services.

Information obtained through interviews, a review of notices, and signatures of meeting participants in student records indicated that eligibility is determined

collaboratively at a meeting with the required participants. However, a review of collaborative reports prepared by child study team members indicated that eligibility was determined prior to the eligibility meeting. Additionally, records did not document that parents receive copies of evaluation reports prepared by speech-language specialists when students are evaluated for a speech disorder in articulation, phonology, fluency, or voice.

Area(s) of Need:

Documenting Eligibility - Information obtained through the interview process, a review of written notices, and signatures in student files indicated the district board of education ensures that a student is determined eligible and classified "eligible for special education and related services" or eligible and classified "eligible for speech-language services" at a meeting with the required participants. However, collaborative reports prepared by child study team members contained statements indicating eligibility was determined prior to the eligibility meeting.

- **The district will develop an improvement plan that will ensure eligibility is determined collaboratively at a meeting with the required participants, and that documentation of eligibility is provided to the parent(s) no later than 15 days after the eligibility meeting.**

Copies of Evaluation Reports - Information obtained through record review and the interview process indicated the district does not consistently provide parents with a copy of the evaluation report(s) conducted by speech-language specialists when students are evaluated for a speech disorder in articulation, phonology, fluency, or voice.

- **The district will develop an improvement plan that will ensure a copy of the evaluation report(s) is provided to the parent or adult student when a student is evaluated for a speech disorder in articulation, phonology, fluency, or voice no later than 15 days after the eligibility meeting. The plan will also include a procedure for ensuring the provision of the evaluation reports(s) is documented in the student record.**

Section VIII: Individualized Education Program

Summary of Findings:

The district ensures that the appropriate team members conduct meetings to develop and review the IEP. IEP's developed for students determined eligible for special education and related services, and for students determined eligible for speech-language services are implemented and in effect as required, and are reviewed at least annually.

However, problems were identified regarding the revision of IEP's and documentation of the appropriate considerations and required statements.

Area(s) of Need:

Revisions of IEPs – Information obtained through a review of records indicated that IEPs were developed, and on many occasions, revised to reflect changes in programming. Documentation was evident that parents received notice of the change in programming. In addition, IEPs reflected handwritten changes that were initialed by the case manager and dated. However, there was not consistent documentation to reflect that a meeting was held to revise the IEP.

- **The district will develop an improvement plan that will ensure that IEP meetings are held when a change in the student's program is proposed.**

Appropriate Considerations and Required Statements – Interviews with the Director and the Child Study teams indicated that although the district has reviewed the sample IEP developed by the NJ Department of Education, they had not yet revised their IEP to align it with the state model.

IEPs developed for students determined eligible for special education and related services and for students determined eligible for speech-language services did not consistently document the appropriate considerations and required statements, including:

- Strengths of the student;
- Parental concerns for enhancing the education of their child;
- Results of the most recent evaluations;
- Communication needs of the student;
- Whether the student requires assistive technology devices and services;

- Beginning at age 14, the need for technical consultation from DVRS;
 - In the case of a student whose behavior impedes learning, strategies(including positive behavioral interventions) and supports to address that behavior;
 - In the case of a student with limited English proficiency, the language needs of the student as related to the IEP;
 - Individualized and measurable annual goals and objectives related to the core curriculum content standards through the general education curriculum;
 - Annual goals and objectives for related services;
 - Individual modifications in the administration of statewide or district-wide assessments or a statement of why that assessment is not appropriate, and how the student will be assessed;
 - Dates services and modifications will begin;
 - How the student's parents will be regularly informed of their child's progress toward the annual goals, and the extent to which that progress is sufficient to enable the student to achieve the goals by the end of the year;
 - State and local graduation requirements;
 - Beginning at age 14, the transition service needs;
 - Beginning at age 16, the needed transition services; and
 - By age 17, statement that the student has been informed of the rights under N.J.A.C. 6A:14 that will transfer to the student on reaching the age of majority
- **The district will develop an improvement plan that will ensure that IEP's are developed with the appropriate considerations and all required statements. It is recommended that the district begin utilizing the state model IEP, which address required considerations and statements.**

Section IX: Least Restrictive Environment

Summary of Findings:

This requirement was reviewed during the previous year's Program Review visit. Additional procedures were used to determine compliance for this year's visit, including a more extensive review of different types of student records, and interviews with more parents and with additional district staff (including general

and special education teachers, all building principals, and all child study team members).

Information obtained through the interview process indicated district personnel attended a technical assistance session in October 1999, provided by the Office of Special Education Programs (OSEP), which focused on implementation of N.J.A.C. 6A:14 with regard to providing students with disabilities access to the general education curriculum and general education programs. IEPs generated after November 1, 1999 were reviewed by the on-site monitoring team to assess the district's progress in implementing the decision making process and documentation requirements for placement in the least restrictive environment.

The district ensures placement in the least restrictive environment by making available a continuum of alternative placements to meet the needs of students with disabilities. Additionally, the district ensures that the placement of a student with a disability is determined at least annually, and that the placement is based on his/her IEP. However, problems were identified with the considerations for placement in the least restrictive environment. In addition, problems were identified with the participation of students in extra-curricular activities when they are educationally placed in out-of-district settings.

Areas of Need:

Decision Making Process and IEP Documentation – The district had recently received technical assistance in providing students with disabilities access to general education programs. However, information obtained through a review of records indicated that IEPs did not reflect documentation to verify the IEP team considers a variety of supplementary aids and services and program modifications in determining whether the student can be educated satisfactorily in a regular classroom. When students were removed from general education programs, IEPs did not reflect an individualized discussion of what supplementary aids and services and program modifications were considered to support the student, nor an explanation of why they were not appropriate to meet the student's individual needs within the general education class. In addition, IEP's did not document a comparison of the benefits provided in a regular class and the benefits provided in a special education class, and the potentially beneficial or harmful effects a placement may have on the student with disabilities or the others in the class.

- **The district will develop an improvement plan that will ensure that the IEP documents that the IEP team considers a variety of supplementary aids and services and program modifications in determining whether the student can be educated satisfactorily in a regular classroom.**

- **The district will develop an improvement plan that will ensure that IEP's document a comparison of the benefits provided in a regular class and the benefits provided in a special education class.**
- **The district will develop an improvement plan that will ensure that IEP's document the potentially beneficial or harmful effects a placement may have on the student with disabilities or the others in the class.**

Participation of students in extra-curricular activities - Parents at the public focus group meeting raised concerns regarding the involvement of students in extra-curricular activities when they are educationally placed in out of district settings. Parents expressed that there was a lack of communication from the district informing them of the activities in which their children could participate.

Information obtained through interviews indicated that the case managers are responsible for sending notices about district activities to students placed in out-of-district settings. However, the case managers do not always receive the information from the district schools.

- **The district will develop an improvement plan that will ensure that students who are educationally placed in out-of-district settings are provided opportunities for participation in district sponsored extra-curricular activities.**

Section X: Transition

A. Transition to Preschool

Summary of Findings:

A review of student records indicated that preschool aged children received timely evaluations when transitioning from early intervention. However, a review of student records indicated a child study team member of the district board of education has not routinely participated in preschool transition planning conferences arranged by the Department of Health and Senior Services.

Area(s) of Need:

In order to facilitate the transition from early intervention to preschool, a child study team member of the district board of education is required to participate in these preschool transition planning conferences arranged by the Department of

Health and Senior Services. Staff members from Special Child Health Services indicated that procedures are in place to involve Hudson County districts in the preschool transition planning conference. Information obtained through the interview process and a review of student records indicated that although the district is invited to participate in these meetings, they have not attended.

- **The district will develop an improvement plan that will ensure that they will participate in the transition planning conference arranged by the Department of Health and Senior Services.**

B. Transition from School to Post-School

Summary of Findings:

Representatives from OSEP conducted an on-site technical assistance session in North Bergen on October 4, 1999. This session focused on federal and state requirements for transition from school to post-school. At the time of this monitoring the district had not received the written feedback resulting from the technical assistance.

Interviews during the on-site monitoring indicated that child study team members have started to implement transition requirements. A social worker assigned to the high school child study team has taken the lead in contacting community agencies, compiling a list of resources and developing an interest questionnaire to be utilized in the transition process.

Although the district has begun to address transition, problems were identified with the consistent documentation of the Transition requirements.

Areas of Need:

A review of records indicated inconsistent and incomplete documentation of the transition requirements.

A statement of transition service needs was documented in some of the IEP's reviewed; however, it did not indicate if technical consultation from the Division of Vocational Rehabilitation was warranted and did not consistently contain the required listing of specific courses for the ensuing school year. Although students' interests and preferences were identified in the IEP, documentation did not explain how these determinations were made. Interviews indicated that student's are asked to complete a transition planning questionnaire and return it to the child study team; however, this was not documented in the records reviewed.

Additionally, IEP's did not meet the requirements for the statement of needed transition services, including:

- Instruction
- Related Services
- Community Experiences
- Employment and other post-school adult living objectives; and
- If appropriate, acquisition of daily living skills and functional vocational evaluation

The district has developed an exit conference summary. Interviews indicated that this is completed during the student's senior year. Although this is a good informational tool it does not allow time for developing or implementing needed transition services.

Parents expressed concerns at the public focus group meeting about students who were graduating, yet totally unprepared for the work force. They expressed that the needed transition services were not being addressed.

- **The district will develop an improvement plan that will ensure consistently that transition service needs are included on IEPs for students beginning at age 14, or younger if appropriate, and needed transition services are provided beginning at age 16, or younger, if appropriate.**

Section XI: Discipline

Summary of Findings:

Information obtained from interviews and from a review of district procedures indicated that when a student with a disability is removed from his or her educational placement, the district imposes the same district board of education procedures as for nondisabled students. However, problems were identified in the Notification of Suspensions to Case Managers and Behavioral Intervention Plans.

Areas of Need:

Notification of Suspensions to Case Managers – Information obtained through a review of documentation indicated that the district's policies and procedures were in place to inform and provide written notification to the Case Manager

regarding the reason for removing a student from his/her placement. The Director is to receive notification of suspensions from principals. This notification is then to be provided to the Case Manager. However, pupil records did not consistently contain this notification.

- **The district will develop an improvement plan that will ensure that the case manager is consistently forwarded written notification of suspensions and a description of the reasons for such action. The plan will include a component that will address the maintenance of these notices in pupil records.**

Behavioral Intervention Plans – The student records failed to demonstrate that IEP teams convened meetings to review, develop, and modify the Behavioral Intervention Plans (BIP) of classified students. IEP teams must ensure that meetings are conducted to review and modify the plans as necessary.

- **The district will develop an improvement plan that will ensure that the IEP team will meet to review and revise Behavioral Intervention Plans as necessary.**

Section XII: Statewide Assessment

Summary of Findings:

The district ensures that students with disabilities participate in statewide assessments, and documentation exists within IEPs reflecting this participation. However, problems were identified with the necessary accommodations and/or modifications needed by students for their participation in these assessments.

Areas of Need:

Documentation reviewed within IEPs clearly indicated that students with disabilities participate in statewide assessments. However, necessary accommodations and/or modifications required by the students were not consistently addressed within the IEPs. Present Levels of Educational Performance would document the need for accommodations and/or modifications. However, upon review of the IEP section designated for statewide assessment, no documentation existed explaining the needed accommodations and/or modifications.

In addition, parents expressed concerns about this at the public focus group meeting. They indicated that modifications were needed for their children to participate in statewide assessments; however, modifications were not being provided.

- **The district will develop an improvement plan that will ensure that IEPs address the necessary accommodations and/or modifications needed by students in order for them to participate in statewide assessments.**
- **The district will develop an improvement plan that will ensure that the necessary accommodations and/or modifications needed by students in order for them to participate in statewide assessments are provided as outlined in their IEPs.**

Section XIII: Graduation

Summary of Findings:

The district ensures that students with disabilities have the opportunity to graduate and participate in graduation exercises. However, problems were identified with the required documentation in IEPs.

Areas of Need:

Although the district ensures that students with disabilities have the opportunity to graduate and participate in graduation exercises, IEPs did not consistently include graduation requirements. The IEP document included a page that focused on graduation requirements; however, this page was missing from many IEPs that were reviewed for students in high school.

- **The district will develop an improvement plan that will ensure that graduation requirements are consistently addressed and documented in IEPs.**

Section XIV: Programs and Services

Summary of Findings:

The district ensures that programs and services are provided according to state requirements; however, problems were identified in class sizes for resource room instruction on the high school level.

Areas of Need:

Upon review of the class rosters for resource room replacement instruction in the high school, it was determined that the class sizes were larger than that allowed by N.J.A.C. 6A:14. Parents at the public focus group meeting also raised this concern.

- **The district will develop an improvement plan that will ensure that the instructional class sizes will not exceed the limits specified in N.J.A.C. 6A:14.**

Section XV: Student Records

Summary of Findings:

The district ensures that student records are collected, maintained, secured, and destroyed in accordance with state and federal law and regulations. However, problems were identified with the access of records for pupils identified as Eligible for Speech/Language Services.

Areas of Need:

For students identified as Eligible for Special Education and Related Services, the district maintains a record of the parties who accessed their records. However, there was no record of parties who accessed the records of students identified as Eligible for Speech/Language Services.

- **The district will develop an improvement plan that will ensure that a record of parties who obtained access to the records of students identified as Eligible for Speech/Language Services will be maintained.**