

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

District: Oaklyn Borough School District **County:** Camden

Monitoring Dates: April 27 and 28, 2004

Monitoring Team: Julia B. Harmelin and Michael J. Lee

Background Information:

During the 2002-2003 school year, the **Oaklyn Borough School District** conducted a self-assessment of policies, procedures, programs, services, and student outcomes. This self-assessment component of the monitoring process provided the Oaklyn Borough School District with an opportunity to evaluate its performance, 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 permit the district the opportunity to identify its areas of strength and promising practices, as well as areas needing improvement and areas that may be noncompliant with state and federal requirements. The district developed an improvement plan to address identified areas of need.

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

As the first step in the on-site monitoring process, the New Jersey Department of Education (NJDOE) held a focus group meeting for parents and community members in the Oaklyn Public School Library on the evening of February 11, 2004. Information obtained from that meeting and through additional telephone interviews was used to direct the focus of the monitoring visit.

During the on-site visit, the OSEP 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, including special education and speech only student records. Interviews were conducted with the district's principal, the special education coordinator, general education teachers, special education teachers, related services providers, the school nurse, and child study team members. Further, additional parent interviews were conducted by telephone.

District Strengths:

The Oaklyn Borough School District is commended for their implementation of a variety of unique programs that benefit all students. The O.A.K. (Oaklyn Acts of Kindness) program, which is coordinated by special education teachers, emphasizes students

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recognizing other students who demonstrate good behaviors. The "Modeling & Mentoring" (M&M) program is facilitated by ninth graders who conduct classroom-based interactions with the Kindergarten to third grade students. The anti-bullying program known as "The Bridge" has been successfully incorporated into the school's curriculum and is overseen by the guidance counselor. Additionally, peer mediation is available for students from the fourth to ninth grades and has been recognized as contributing to a more wholesome community atmosphere.

Data Summary:

A review of 2003 data indicates the district's classification rate of 16.3% exceeds the state average of 14.3% for students eligible for special education and related services. During the self-assessment, the district indicated this was a result of the number of classified students transferring into the district. A review of the district's plan to correct this area indicated it was insufficient and will need to be revised.

2003 district data indicated that 33% of its students are educated with their nondisabled peers for more than 80% of the school day. The district has indicated it will hire a special education teacher to provide in-class support at the upper grades and provide general education teachers with training in instructional strategies, adaptations and behavioral interventions. The district will need to revise its improvement plan to further incorporate deployment of existing staff, additional training programs, revisions to its pre-referral resources and interventions and the identification of additional supplemental aids and services.

Area Demonstrating Compliance with All Standards:

Reevaluation and **Graduation** were determined to be areas of compliance by the district during self-assessment and by the Office of Special Education Programs during the on-site visit.

Section I: General Provisions

Summary of Findings:

During self-assessment the district accurately identified themselves compliant in the areas of policies and procedures and the dissemination of IDEA information.

During the self-assessment process, the district identified concerns regarding in-service training for general education teachers, particularly in the areas of instructional strategies, adaptations and behavioral interventions. The district's improvement plan is sufficient to address this area. The district also identified an area of need regarding parent training. **The district did not submit an improvement plan to address this area and needs to do so.** Further, the district identified a need for a "standard, established, comprehensive process" for training professional, para-professional and substitute staff who provide special education or general education services. **The district's plan is insufficient because it does not identify a plan of professional development that is clearly connected to staff needs and the provision of educational programs in the district. The district will revise the improvement plan to include activities to assess training needs, to provide the staff development and to identify how the district will evaluate the effectiveness of the training.**

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No additional area of need was identified during the on-site visit.

Section II: Free, Appropriate Public Education (FAPE)

Summary of Findings:

During self-assessment the district accurately identified themselves compliant in the areas of length of school day, transfer students, facilities and certification.

During the self-assessment process, the district identified concerns in the area of hearing aids. **The district's plan is insufficient because, although the proposed activity will require the child study team coordinator to send a letter to the parent, it omits any activities that require the district to ensure it maintains the hearing aids. The district will revise the improvement plan to include activities to ensure that the hearing aids are functioning properly.** The district further identified areas of need regarding the development of goals and objectives for counseling as a related service. **The district's improvement plan is insufficient because it fails to include any activities or an administrative oversight component to ensure correction. Staff interviews conducted during the on-site visit indicated there was a disagreement about who should be developing these goals. As such, the activities must ensure the identification of the individuals who will be responsible to develop these counseling goals. Implementation of these activities will ensure related services providers are aware of specific student needs and are able to determine progress in meeting therapy benchmarks.**

Additional areas of need were identified during the on-site visit regarding extended school year, frequency and duration of related services, provision of counseling services, and speech and language goals and objectives.

Area(s) of Need:

Extended School Year – During the on-site visit, interviews and record review indicated that the district does not consider extended school year services for every student determined eligible for special education and related services or eligible for speech and language services. In addition, for those students who are found in need of extended school year programming, IEPs do not include the description of the services needed, goals and objectives, implementation dates, and frequency, duration and location of services. As a result, review of a student's IEP by a parent, case manager, teacher, related services provider or administrator would not provide a clear understanding of the service(s) required.

- **The district will revise its improvement plan to include activities that ensure that extended school year is considered and provided for every classified student when those services are necessary. These activities will result in the consideration of regression/recoupment issues for all students as well as any other factors that may impact a student's level of academic performance. Additionally, IEPs will include a description of services needed, goals and objectives, implementation dates, and frequency, duration and location of services. The improvement plan must include**

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training and an administrative oversight component to ensure the consistent implementation of these activities.

Frequency and Duration of Related Services – During the on-site monitoring, interviews and record review indicated that the district often utilizes ranges to identify frequency (e.g., 1 to 2 times) and duration (e.g., 20 to 30 minutes) of related services in the IEP. As a result, it is unclear when or for how long the service will be provided.

- **The district will revise its improvement plan to include activities that ensure IEP team members identify the specific frequency and duration of all related services. Implementation of these activities will ensure the provision of related services that were agreed to by the members of the IEP team. The improvement plan must include an administrative oversight component to ensure the consistent implementation of these activities.**

Provision of Counseling Services – During the on-site monitoring, staff interviews and reviews of student records, counseling schedules and related service providers' logs indicated that counseling services were not consistently being provided to students as required by the IEP.

- **The district will revise its improvement plan to include activities to ensure that students receive counseling services as required by their IEP. If it is determined that the district lacks sufficient personnel to provide the required level of service, then the plan must also include activities to address this need. These activities may include seeking other resources within the district, redeploying child study team members or obtaining additional staff members. Further, the plan must include an administrative oversight component to ensure consistent implementation of the activities.**

Speech and Language Goals and Objectives – During the on-site monitoring, interviews and record review indicated that speech and language goals and objectives were not being developed for students requiring this related service.

- **The district will revise its improvement plan to include activities to ensure goals and objectives are developed and included in IEPs for all related services. Implementation of these activities will ensure related services providers are aware of specific student needs and are able to determine progress in meeting therapy benchmarks. The plan must include an administrative oversight component to ensure consistent implementation of the activities.**

Section III: Procedural Safeguards

Summary of Findings:

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

During the self-assessment process, the district identified concerns in the area of notices of meetings. The district's plan is sufficient to address this area of need. During the on-

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site visit, it was determined that the district has begun to implement its improvement plan to address notice of meeting requirements.

Additional areas of need were identified during the on-site visit regarding surrogate parents, participants at meetings, written notice, and provision of N.J.A.C. 1:6A.

Area(s) of Need:

Surrogate Parent – During the on-site monitoring, it was determined that the district lacks procedures to ensure that a surrogate parent is identified and trained and provided when necessary.

- **The district will revise its improvement plan to include activities to ensure the district has the ability to select and train surrogate parents in the event one is needed. Implementation of these activities will ensure a student's rights are protected in the event the natural parent is unavailable. The improvement plan must include an administrative oversight component to ensure consistent implementation of the activities.**

Participants at Meetings – During the on-site monitoring, interviews and record review indicated that IEP team members, primarily general education teachers but also special education teachers, are frequently not in attendance. In numerous cases, teachers noted that coverage was not provided and, after the meeting, the absent teacher was asked to sign that he or she had indeed attended. Moreover, record review of speech only files indicated that general education teachers do not consistently attend identification meetings, eligibility conferences, and IEP/annual review meetings.

- **The district will revise its improvement plan to include activities to ensure all required participants attend IEP meetings. Implementation of these activities will ensure information is obtained from all required participants and that the decision-making process includes input from each participant. The plan must include an administrative oversight component to ensure the consistent implementation of the activities.**

Written Notice – During the on-site monitoring, review of district documents and student records indicated that written notice does not document the factors used in making decisions, the description of other relevant factors and the description of options considered and rejected and why rejected.

- **The district will revise its written notices to ensure they include all required components. Implementation of these activities will ensure not only that parents are fully informed of the actions the child study team is proposing but also will afford parents the right to agree or disagree with these proposals.**

Provision of N.J.A.C. 1:6A – During the on-site visit, record review and interviews indicated that, following the determination to conduct or not conduct an initial evaluation, the district does not provide parents with a copy of the due process hearing rules (N.J.A.C. 1:6A).

- **The district will revise its improvement plan to include activities that ensure a copy of the due process hearing rules (N.J.A.C. 1:6A) is provided**

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to parents. Implementation of this activity will ensure parents are fully informed of dispute resolution opportunities and the procedures necessary to efficiently access these services. The plan must include an administrative oversight component to ensure the consistent implementation of the activities.

Section IV: Location, Referral and Identification

Summary of Findings:

During self-assessment the district accurately identified themselves compliant in the areas of direct referrals and identification meeting timelines.

During the self-assessment process, the district identified an area of need regarding the participation of the speech and language therapist at identification meetings for a preschool aged child or when the suspected disability is a communication disorder. The district's plan is sufficient to address this area of need. The district further identified an area of need regarding Child Find. **The district's plan is insufficient because it lacks an administrative oversight component to ensure consistent implementation of the activities.** The district also identified an area of need regarding the maintenance of written documentation of the implementation and effectiveness of the pre-referral interventions by staff. **The district did not submit an improvement plan to address this area and needs to do so.** The district also identified areas of need regarding the intervention and referral services team (I&RST) and pre-referral process. **The district's plan is insufficient because it lacks an administrative oversight component to ensure the consistent implementation of the activities.** The district also identified an area of need regarding the completion of a health summary and vision and hearing screenings prior to the identification meeting. **The district's plan is insufficient because, although it includes the activity of sending a request to the school nurse, it lacks a mechanism to ensure that this information will be available at the evaluation planning meeting to identify suspected areas of disability and to determine the assessments needed to make an appropriate eligibility determination. Moreover, the procedures fail to include preschool-aged students who would not otherwise be known by the school nurse. The improvement plan must be revised to include these activities, as well as an administrative oversight component.**

No additional area of need was identified during the on-site visit.

Section V: Protection in Evaluation and Evaluation Procedures

Summary of Findings:

During self-assessment the district accurately identified themselves compliant in the areas of multidisciplinary evaluations, bilingual evaluations and documentation of acceptance or rejection of reports.

Areas of need were identified during the on-site visit regarding the completion of required assessments, functional assessments and dating of reports.

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Area(s) of Need:

Completion of Required Assessments – During the on-site monitoring, child study team interviews and record review indicated that assessments identified in the nature and scope of the evaluation are not being conducted.

- **The district will revise its improvement plan to include activities to ensure all assessments to which the parent consented are conducted. Implementation of these activities will ensure eligibility determinations are based on the information obtained from the evaluation agreed to by the members of the identification team. The plan must include an administrative oversight component to ensure the consistent implementation of the activities.**

Functional Assessment – During the on-site monitoring, interviews and record review indicated that child study team members and the speech/language specialist do not include all required components of a functional assessment in their evaluation reports. While in the majority of cases the documentation of educational impact and review of previous/relevant interventions were missing, teacher interview/input and a non-testing situation observation were also omitted.

- **The district will revise its improvement plan to include activities to ensure that evaluators include all required components of functional assessments. Implementation of these activities will ensure eligibility determinations are based on all required data obtained through the assessment process. The plan must include an administrative oversight component to ensure consistent implementation of the activities.**

Dating of Reports – During the on-site monitoring, interviews and record review indicated that child study team members and the speech/language specialist do not date their reports. As a result, it cannot be determined when a report was developed.

- **The district will revise its improvement plan to include activities to ensure that the child study team members and the speech/language specialist consistently sign and date their assessment reports.**

Section VII: Eligibility

Summary of Findings:

During self-assessment the district accurately identified themselves compliant in the areas of statement of eligibility and provision of evaluation reports to parents.

During the on-site monitoring, areas of need were identified regarding use of screening information to establish eligibility for speech and language services and agreement or disagreement rationale.

Area(s) of Need:

Speech and Language Screenings to Establish Eligibility – During the on-site monitoring, record review indicated that speech and language reports do not contain

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standardized assessment results. Reports lack this information because the speech therapist is conducting screenings to determine eligibility instead of conducting the required standardized assessments.

- **The district will revise its improvement plan to include activities to ensure the speech and language therapist conducts appropriate standardized assessments to determine eligibility. Implementation of these activities will ensure that evaluators include the information needed to make appropriate eligibility determinations for students demonstrating speech and/or language difficulties. The plan must include an administrative oversight component to ensure consistent implementation of the activities.**

Signatures of Agreement or Disagreement – During the on-site monitoring, interviews and record review indicated that the district IEP team members do not document assenting or dissenting opinions regarding eligibility determinations for students eligible for special education or for students eligible for speech and language services only. As a result, parents are not made aware of this point of view regarding eligibility determinations.

- **The district will revise its improvement plan to include activities that will ensure that district personnel have an opportunity to state in writing whether they agree or disagree with eligibility determinations. Further, the district will document the rationale for any disagreement. Implementation of these activities will ensure parents are fully informed of any differing opinions regarding these eligibility determinations. The improvement plan must include an administrative oversight component to ensure the consistent implementation of these activities.**

Section VIII: Individualized Education Program (IEP)

Summary of Findings:

During self-assessment the district accurately identified themselves compliant in the areas of IEP meetings, present levels of educational performance, age of majority, annual reviews and ninety-day timelines.

During the self-assessment process, the district identified concerns in the area of teacher knowledge and access. **The district's plan is insufficient because it lacks an administrative oversight component.**

Additional areas of need were identified during the on-site visit regarding core curriculum content standards as related to appropriate goals and objectives, speech IEPs, and implementation of related services.

Area(s) of Need:

Core Curriculum Content Standards/Academic Goals and Objectives – During the on-site monitoring, it was determined during record review and staff interviews that goals and objectives are not aligned to the core curriculum content standards. The district selects academic goals and objectives from a finite checklist that does not address the student's individual needs for adaptations and modifications.

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- **The district will revise its improvement plan to include activities to ensure that goals and objectives are aligned to the core curriculum standards and include any required adaptation or modification. Implementation of these activities will ensure students are instructed in the same content areas as their nondisabled peers and are afforded the modifications necessary to address their individual needs.**

Speech IEPs – During the on-site monitoring, it was determined during record review of speech only IEPs and through interviews that extended school year is not being considered. Additionally, participation in statewide assessments is not addressed in the IEP or is incorrectly addressed.

- **The district will revise its improvement plan to include activities to ensure that the IEP team accurately addresses all required statements in the speech only IEP. Implementation of these activities will ensure that the IEP team members follow an appropriate decision-making process. The improvement plan must include an administrative oversight component to ensure consistent implementation of the activities.**

Implementation Dates of Related Services – During the on-site monitoring, interviews and record review indicated that related services, particularly speech and counseling, do not consistently begin at the start of the school year, in order to accommodate administrative needs regarding scheduling and grouping.

- **The district will revise its improvement plan to include activities to ensure students are provided with related services at the beginning of the school year and that the provision of these services are not delayed due to administrative issues. Implementation of these activities will ensure each student receives the related services necessary to afford full educational benefit from the recommended program. The improvement plan must include an administrative oversight component to ensure the consistent implementation of the activities.**

Section IX: Least Restrictive Environment (LRE)

Summary of Findings:

During the self-assessment process, the district identified concerns in the area of notification and participation in nonacademic and extracurricular activities. **The district's plan for notification of out-of-district students is insufficient because it lacks an ongoing plan to ensure all students are afforded the opportunity to participate in nonacademic and extracurricular activities with their non-disabled peers throughout the course of the school year. Further, the plan suggests that a criteria will be established to determine which information will be disseminated and to whom. This needs to be removed from the plan since participation in these activities is determined by the members of the IEP team. The improvement plan needs to be revised to address these activities, as well as to include an administrative oversight component.**

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Additional areas of need were identified during the on-site visit regarding the decision-making process/continuum of options and Oberti consideration and documentation.

Area(s) of Need:

Individual Decision-Making and Continuum – During the on-site monitoring, interviews and record review indicated that if a program or service is not available in the school, that program or service is not offered.

- **The district will revise its improvement plan to include activities to ensure the provision of programs and services that are based on the individual needs of students and not on program availability. Implementation of these activities will ensure each student receives the program and services that are necessary to address the individual needs identified by the IEP team. The plan must include an administrative component to ensure the consistent implementation of the activities.**

Oberti Consideration and Documentation – During the on-site monitoring, interviews and record review indicated that although the district is using the state IEP format, team members are not responding to the four statements required when considering the least restrictive environment.

- **The district will revise its improvement plan to include activities to ensure the IEP specifies: the considerations of appropriate supplementary aids and services and program modification; the explanation why the supplementary aids and services and program modifications are not appropriate; and, the documentation of the comparison of benefits in each setting. Implementation of these activities will ensure the team has documented the decision-making process and more clearly defined the rationale for a specific placement. The plan must include an administrative component to ensure the consistent implementation of the activities.**

Section X: Transition to Preschool

Summary of Findings:

During self-assessment the district accurately identified themselves compliant in the area of agency involvement.

During the self-assessment process, the district identified concerns in the area of early intervention to preschool disabled placement by age three. The district's plan is sufficient to address this area of need.

An additional area of need was identified during the on-site visit regarding the preschool transition planning conference.

Area(s) of Need:

Preschool Transition Planning Conference – During the on-site monitoring, interviews and record review indicated that district personnel do not participate at transition planning conferences.

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- **The district will revise its improvement plan to include activities to ensure a member of the child study team participates in the early childhood transition planning conference. Implementation of these activities will ensure sufficient information is obtained from early intervention staff regarding the student's strengths and needs to further ensure the district has the opportunity to provide appropriate programs and services. This plan must include an oversight component to ensure the consistent implementation of the activities.**

Section X: Transition to Post-School

Summary of Findings:

During the self-assessment process, the district identified concerns in the area of student invitation. **The district's improvement plan is insufficient because, although it indicates that notice of meeting will be revised, there was no indication that notice was being provided to students inviting them to participate in the IEP meeting. The plan needs to be revised to include this activity.**

Additional areas of need were identified during the on-site visit regarding age-fourteen transition service needs, student interests and preferences and documentation of courses of study.

Area(s) of Need:

Age 14 Transition Services Needs – During the on-site monitoring, staff interviews and record review indicated the district is not assessing student interests and preferences and IEPs do not consistently document transition services needs.

- **The district will revise the improvement plan to include activities to ensure student interests and preferences are assessed. Implementation of these activities will ensure that the student is afforded the opportunity to participate in courses of study that are related to these interests and preferences and connected to post-secondary outcomes. The plan must include an administrative oversight component to ensure the consistent implementation of the activities.**

Section XI: Discipline

Summary of Findings:

During self-assessment the district accurately identified themselves compliant in the areas of functional behavioral assessment, behavioral intervention plans and manifestation determination.

During the self-assessment process, the district identified concerns in the area of providing copies of special education and disciplinary records when reporting a student for a crime. The plan is sufficient to address this area of need. Further, the district identified concerns in the areas of notification of removal to the case manager and

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interim alternative educational settings. Though the plan contains appropriate activities, the date for completion of these activities has passed and information gathered during the on-site visit from interviews and record review continue to indicate noncompliance. **The district will identify another date and ensure it implements the activities and corrects this area of need by that date if not sooner. The plan must include an administrative oversight component to ensure consistent implementation of the activities.** The district further identified an area of need regarding procedural safeguards for a potentially disabled student. **The district did not submit an improvement plan and needs to do so.**

An additional area of need was identified during the on-site visit regarding suspension tracking.

Area(s) of Need:

Suspension Tracking – During the on-site monitoring, interviews and record review indicated that written notification of a student's removal from program is not provided to the case manager. As such, in the event that a student was removed from program for a period of time that exceeded ten days, there is no mechanism in place to ensure appropriate educational services would be provided to the student on the eleventh day of removal from school.

- **The district will revise its improvement plan to include activities to ensure every removal is accurately tracked by the case manager and that services are provided when required. Implementation of these activities will ensure students have the opportunity to progress in the general education curriculum as well as in their goals and objectives. The plan must include an administrative oversight component to ensure the consistent implementation of these activities.**

Section XII: Statewide Assessment

Summary of Findings:

During self-assessment the district accurately identified themselves compliant in the area of student participation in statewide assessment, accommodations and modifications and IEP documentation.

An area of need was identified during the on-site visit regarding the alternate proficiency assessment.

Area(s) of Need:

Alternate Proficiency Assessment (APA) – During the on-site monitoring, teachers and child study team members reported they have not received any training and are largely unaware of alternative proficiency assessments. Moreover, record review indicated that, for students with disabilities who were determined to require an alternative to the statewide assessment system, no description of the assessment was provided in the IEP.

- **The district will revise the improvement plan to include activities to ensure students who require the APA are provided with that assessment.**

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Implementation will ensure that when the nature of a student's disability is such that the student's academic performance cannot be measured by the standard statewide assessment system, the student shall participate in the APA. The plan must include in-service training for instructional staff and child study team members as well as an administrative oversight component to ensure the consistent implementation of the activities.

Section XIV: Programs and Services

Summary of Findings:

During self-assessment the district accurately identified themselves compliant in the areas of age range, group sizes for speech therapy and home instruction.

During the self-assessment process, the district identified concerns in the area of its liability for review of licensure of early childhood programs in which the district places preschool age students. The district's improvement plan is sufficient to address this area.

Additional areas of need were identified during the on-site visit regarding class sizes and common planning time.

Area(s) of Need:

Class Sizes – During the on-site monitoring, class lists, staff interviews and observations indicated that numerous classrooms of pull-out replacement instruction exceeded sizes identified in the code. These classes were also lacking supplies, texts, instructional materials, student furniture and adequate physical space. This is a result of the district's lack of planning to address increasing student numbers.

- **The district will revise its improvement plan to include activities to ensure that special education group sizes do not exceed those allowed by code. The activities must include a mechanism to ensure the district has the ability to closely monitor class sizes throughout the year to determine the need for capacity aides or to request class sizes exceptions through the county office. Implementation of these activities will ensure that the district can more effectively implement programs and services in an environment where students will have the opportunity to derive full educational benefit because group size remains within the required limit.**

Common Planning Time – During the on-site monitoring, staff interviews and reviews of schedules indicated that teachers are not provided time to plan with other teachers regarding students for whom they share educational responsibilities.

- **The district will revise its improvement plan to include activities to ensure that teachers are given common planning time to discuss issues for those students for whom they share educational responsibility. Implementation of these activities will ensure student needs are discussed and activities and strategies are developed to address those needs within the general educational setting.**

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Section XV: Student Records

Summary of Findings:

During self-assessment the district accurately identified themselves compliant in the areas of requests for access to records, access sheets and maintenance and destruction of records.

An area of need was identified during the on-site visit regarding documentation of locations.

Area(s) of Need:

Documentation of Locations – During the on-site visit, record review determined that the district does not identify in the central file the location of other records maintained by the district.

- **The district will revise its improvement plan to include an activity to ensure that the locations of other student records maintained by the district are identified in the central file. Implementation of this activity will ensure that parents and school personnel have knowledge of and access to all records relevant to that student.**

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Summary

On-site special education monitoring was conducted in the **Oaklyn Borough School District** on April 27 and 28, 2004. The purpose of the monitoring visit was to verify the district's report of findings resulting from their self-assessment and to review the district's improvement plan. As a result of the district's review, they were able to identify some areas of need and develop an improvement plan that, with some revisions, will bring about systemic change.

Reevaluation and Graduation were sections demonstrating compliance with all standards.

Seven parents attended a public focus group meeting, and four additional community members mailed in comments, expressing their satisfaction with many of the district's programs and services. The principal and special education coordinator were also in attendance. In general, the district was praised for its staffs' willingness and efforts in responding to parental requests and in adequately resolving issues. Parents noted that they are welcomed participants at meetings and are very involved in educational programming. Further, IEPs are developed and implemented in a timely manner; evaluation reports are written and provided to parents and explained in a meaningful format. Parents noted that the availability of programs in Oaklyn dictates what a student will receive. With budgetary constraints, not only are new teachers not being hired and additional classes not being opened but also established resources, such as Reading Recovery and after-school homework club are being cancelled. Parents reported that proposed programs like the after-school buddy system and S.A.F.E. (student assisting for a friendly environment) were never started. Additionally, parents reported that the district lacks an effective oversight system to ensure that what's written in the IEP actually occurs. Staffing issues have hampered the provision of mandated counseling. Although parents acknowledge that some out-of-district students are receiving extended school year services, the topic is not brought up at IEP team meetings and, when it is, the parent is often informed that no money is available. In regard to preschool transition planning, several parents agreed that the district is not actively involved to ensure a smooth transition for the child. Parents indicate the need for appropriate and ongoing training programs for staff and parents and the need for increased communication among district staff (e.g., related service providers to case manager to teachers) to improve the educational experience for all students. A number of these concerns were identified during the on-site monitoring.

Areas identified as consistently compliant by the district during self-assessment and verified during the on-site monitoring visit included policies and procedures, dissemination of IDEA information, length of school day, transfer students, facilities, certification, consent, notices in native language, interpreters, independent evaluations, direct referrals, identification meeting timelines, multidisciplinary evaluations, bilingual evaluations, acceptance and rejection of reports, statement of eligibility, copy of reports to parents, IEP meetings, present levels of educational performance, age of majority, annual review timelines, ninety-day timelines, preschool agency involvement, functional behavioral assessment, behavioral intervention plans, manifestation determination, student participation in statewide assessment, accommodations and modifications, IEP documentation, age-range, group sizes for speech therapy, home instruction, access to records, access sheets and maintenance and destruction of student records.

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During the self-assessment process, the district identified areas of need regarding parent and staff training, hearing aides, counseling goals and objectives, notices of meeting, speech and language specialist functioning as a member of the child study team, Child Find, pre-referral process, documentation of intervention effectiveness, health summary, vision and hearing screenings, teacher knowledge and access, notification and participation of students in non-academic and extracurricular activities, placement by age three, post-school student invite, providing copies of special education and disciplinary records to authorities when a crime has been committed, notification of removal to the case manager, interim alternative educational settings, procedural safeguards for potentially disabled students, and district assurances about the licensure of early childhood programs.

The on-site visit identified additional areas of need within the various standards, regarding extended school year, frequency and duration of related services, provision of counseling services, speech and language goals and objectives, surrogate parents, participants at meetings, written notice, provision of due process hearing rules, completion of required assessments, functional assessment, dating of reports, speech and language screenings to establish eligibility, signatures of agreement or disagreement, core curriculum content standards/academic goals and objectives, speech IEPs, implementation dates for related services, individual decision-making and continuum, Oberti consideration and documentation, preschool transition planning conference, age 14 transition services needs, suspension tracking, alternative proficiency assessment, class sizes, common planning time, and documentation of locations.

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