

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

District: Paulsboro School District

County: Gloucester

Monitoring Dates: January 20, 21, 22 & 23, 2004

Monitoring Team: Caryl Carthew, Jane Marano and Kenneth Richards

Background Information:

During the 2002-2003 school year, the Paulsboro School District conducted a self-assessment of policies, procedures, programs, services, and student outcomes. This self-assessment component of the monitoring process provided the Paulsboro School District with an opportunity to evaluate its 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 Paulsboro 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.

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 at the Paulsboro High School on December 16, 2003. Information obtained from that meeting was used to direct the focus of the monitoring visit.

During the on-site visit, the NJDOE team reviewed district documents, including district policies and procedures, student count information, master student lists, class lists, schedules of students, teachers, related service personnel, and other relevant information, including a representative sample of student records. Interviews were conducted with the district's superintendent, special education administrators, building principals, general education and special education teachers, speech therapists and child study team members.

Data Summary:

The district's classification rate is 19.5 % as compared to the state average of 13.4 %. To address this concern, the district identified activities in the improvement plan to monitor referrals, train teachers and child study team members and improve the quality of strategies that are available to the members of the district's referral committee. The high classification rate may also be the result of the inconsistent manner in which these referral committees operate at the elementary grade levels.

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The district did increase by 8% the amount of time classified students are included in general education between 40-80 % of the day. However, district statistics provided in Part One of the self-assessment identified a continued need in this area. Approximately 47% of the classified students were participating in programs that provided access to general education less than 40% of the day or in totally separate settings. The district has begun to implement programs to return students to in-district programs and to have greater access to the general education program.

District Strengths:

The district is commended for recognizing the need to develop in-district programs for students who would have been placed in out-of-district programs as well as for those students who have the potential to drop out of high school. A program has been developed that includes a modified day with instruction that allows them to earn a high school diploma. Each student is provided with a lap top computer for their use for classroom instruction and class work. The students also learn necessary basic computer skills that will enable them to become competitive in the workplace upon graduating from high school. Students demonstrating satisfactory behavior management and attendance participate in the district's school to career program that teaches job readiness skills, job search skills and other employment related skills necessary for obtaining employment.

The district has completed the first year of an extensive inclusion initiative which includes teacher training made available through the Department of Education capacity building grant. As a result of this program, eleven students were placed into regular education classes with support from special education teachers and aides

The district is also establishing a phonemic awareness program to improve language and reading skills. Two speech/language specialists and two teachers of the handicapped will be trained in this program.

Areas Demonstrating Compliance With All Standards:

Statewide Assessment, Graduation and Programs and Services 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, procedures and dissemination of IDEA information

During the self-assessment process, the district identified concern in the area of staff training. **The district's improvement plan is insufficient to address this area because it lacks a mechanism to determine the effectiveness of the training and an administrative oversight component to ensure the compliant implementation of the procedure. The plan needs to be revised to include these components.**

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An additional area of need was identified during the on-site visit regarding staff training.

Area of Need:

Staff Training - Information obtained during interviews determined that child study team members are in need of training in the areas of code revisions and implementation of procedures to appropriately comply with code requirements.

- **The district will revise it's improvement plan to include activities to ensure in-service training is provide to child study team members in the areas of code revisions and implementation of procedures to appropriately comply with code requirements. Implementation of these activities will ensure district staff members have the necessary knowledge to ensure the provision of programs and services in a timely manner to identified and classified students. The improvement plan must include a mechanism to determine the effectiveness of the training and an administrative oversight component to ensure implementation of the activities.**

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 and year, transfer students, facilities and certifications.

Areas of need were identified during the on-site visit regarding extended school year and the provision of counseling.

Areas of Need:

Provision of Counseling as a Related Service - Information obtained during record review and interviews determined students at all grade levels are not consistently receiving the amount of counseling identified in their IEPs because the district does not have sufficient staff to provide the required amount of counseling for these students. Furthermore, staff indicated that if adequate counseling services were available, staff members would be able to proactively address the high rate of suspension among students with disabilities.

- **The district will revise it's improvement plan to include activities to ensure students receive counseling services required by their IEPs. The plan must include a mechanism to either employ additional staff and/or identify other appropriately certified staff in the district. Implementation of these activities will ensure each student has the opportunity to derive full educational benefit from his/her special education program. The plan must include an administrative oversight component to ensure the consistent implementation of the procedure.**

Extended School Year - Information obtained during record review and interviews determined that extended school year is not consistently considered for every student. Furthermore, when considered for a student, program descriptions, goals and objectives,

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beginning and ending dates, and factors considered when not receiving extended school year are not consistently documented in IEPs.

- **The district will revise its improvement plan to include activities to ensure extended school year is considered for all student with a disability, and provided when appropriate. In the event an extended program is required, the IEP must include implementation and ending dates, a description of the program and goals and objectives to address the identified areas. Implementation of these activities will ensure issues related to regression/recoupment or other factors that interfere with a student's ability to retain information are addressed. The plan must include an administrative oversight component to ensure the 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, notice in native language, interpreters at meetings and independent evaluations

During the self-assessment process, the district identified concerns in the areas of surrogate parents and the provision of written notice. The district's improvement plan is sufficient to address the area of surrogate parents. **The district's improvement plan is insufficient to address the area of written notice because the plan lacks appropriate activities to ensure written notice is provided in a timely manner. The plan needs to be revised to include these activities and an administrative oversight component to bring about the required change.**

Additional areas of need were identified during the on-site visit regarding notice of meetings and written notice.

Areas of Need:

Notice of Meetings - Information obtained during record review determined that notice of meeting does not inform the parent that the parent and district have the right to invite others with expertise to a meeting. Notice of meeting does not inform the parent that transition services will be discussed for students fourteen years of age and older. Furthermore, a copy of PRISE is not provided to the parent with notice of a meeting for students eligible for speech and language service

- **The district will revise its notices of meetings to include all required components. The plan must include a mechanism to ensure the provision of PRISE whenever notice of a meeting is provided. It is recommended the district adopt the notice of meeting forms developed by the Office of Special Education. Implementation of these activities will ensure parents are informed of their right to invite others with expertise and are provided with written materials that explain their rights and the rights of their children.**

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Written Notice (content) - Information obtained through record review determined that written notice does not document the factors used in making decisions, a description of other relevant factors and a description of options considered and rejected and why rejected.

- **The district will revise its written notices to include all required components. It is recommended the district adopt the notices developed by the Office of Special Education. Implementation of these activities will ensure parents are informed in writing of decisions made at a meeting and the factors considered in making the decisions.**

Section IV: Location, Referral and Identification

Summary of Findings:

During self-assessment the district accurately identified themselves compliant in the areas of child find activities and summer referrals.

During the self-assessment process, the district identified concerns in the areas of identification meeting timelines and participants. The district's improvement plan is sufficient to address these areas.

Additional areas of need were identified during the on-site visit regarding the pre-referral process, direct referrals from parents and staff, health summary, vision and hearing screening and preschool referrals.

Areas of Need:

Health Summary and Vision and Hearing Screening - Information obtained through record review and interviews determined that a vision and hearing screening and health summary is not conducted prior to the identification meeting when the meeting is conducted in response to a direct parent referral to the child study team.

- **The district will revise its improvement plan to include activities to ensure health summaries and vision and hearing screenings are conducted prior to identification meetings conducted in response to a direct parent referral to the child study team. Implementation of these activities will ensure the team has the information necessary to determine the need for an evaluation and the assessments that will make up that evaluation. The plan must also include an administrative oversight component to ensure the consistent implementation of the procedure**

Preschool Referrals – Information obtained through record review and interviews determined that regular education teachers do not consistently attend identification meetings at the preschool level. Furthermore, delays in processing preschool referral forms result in non-compliance in meeting the twenty day identification meeting timeline.

- **The district will revise its improvement plan to include activities to ensure preschool identification meetings are conducted within twenty days of date of receipt of a referral and that a regular education is in**

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attendance at the identification meeting. Implementation of these activities will ensure decisions regarding the need for an evaluation are made by an appropriately configured team and in a timely manner to further ensure the provision of services, if needed, by the student's third birthday. The plan must include an administrative oversight component to ensure the consistent implementation of the activities.

Direct Referrals from Parents and Staff - Information obtained through record review and interviews determined that direct referrals from parents and staff are not forwarded to the child study team. Instead, they are sent to the PAC committee for interventions.

- **The district will revise its improvement plan to include activities to ensure parents and school personnel have the opportunity to directly refer a student to the child study team to determine the need for an evaluation. As a result of that meeting, a determination may be made that the student does not require an evaluation and in fact could benefit from interventions through the PAC. Implementation of these activities will ensure a potentially disabled student is identified in a timely manner. The plan must include an administrative oversight component to ensure the consistent implementation of the activities.**

Pre-referral Process - Information obtained through record review and interviews determined that at the elementary level, PAC procedures are inconsistently implemented. It was further identified that most committee members do not document the interventions that have been attempted nor do they follow-up to determine the effectiveness of these interventions.

- **The district will revise its improvement plan to include activities to ensure pre-referral procedures are appropriately implemented in each school. Implementation of these activities will ensure each student referred to the PAC will have his/her progress reviewed on an on-going basis and that all follow-up activities are documented to determine the effectiveness of the interventions and/or the need to revise the intervention plan. The plan must include an administrative oversight component to ensure the consistent implementation of the activities.**

Section V: Protection in Evaluation and Evaluation Procedures

Summary of Findings:

During self-assessment the district accurately identified themselves compliant in the areas of multi-disciplinary assessments, standardized assessments and bilingual evaluations.

During the self-assessment process, the district identified concerns in the area of acceptance/rejection of reports. **The district's improvement plan is insufficient because it lacks appropriate activities to ensure the district accepts or rejects parts or the whole report and then provides a rationale to identify why specific parts were rejected. The plan must be revised to include these activities.**

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Additional areas of need were identified during the on-site visit regarding functional assessments conducted for students eligible for special education and related services and eligible for speech and language services.

Areas of Need:

Functional Assessment - Information obtained through record review determined that functional assessments conducted for students eligible for special education and related services do not include a structured observation in other than a testing session, and parent and teacher interviews. Furthermore, record review determined that functional assessments conducted for students eligible for speech and language services do not include a review of the student's educational history and do not consistently document the educational impact as provided by the classroom teacher.

- **The district will revise its improvement plan to include activities to ensure written evaluation reports include a structured observation, parent and teacher interviews, review of the student's educational history and documentation of educational impact. Implementation of these activities will ensure the team has the necessary information to make eligibility determinations and to develop programs that will address the identified areas of need. The plan must include an administrative oversight component to ensure the consistent implementation of the procedure.**

Section V: Reevaluation

Summary of Finding:

During self-assessment the district accurately identified themselves compliant in the areas of planning meetings, and participants for students eligible for special education and related services and reevaluation completed by June 30th of the students' last year in preschool.

During the self-assessment process, the district identified concerns in the areas of three year timelines. **The district's improvement plan is insufficient to address this area because it lacks appropriate activities and an administrative oversight component to bring about the required change. The plan needs to be revised to include these elements.**

Additional areas of need were identified during the on-site visit regarding undue delay following receipt of consent and conducting a reevaluation when a change in eligibility is considered.

Areas of Need:

Undue Delay Following Receipt of Consent - Information obtained through interviews determined that at the annual review meeting for those students who will require a reevaluation the following school year, the district conducts a reevaluation planning meeting, reviews data, and, if necessary, obtains parental consent to conduct assessments. However, that evaluation is not conducted until the following school year. Because there is a significant delay between the review of data and the date of

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implementation of the decision made as a result of that interview, the data are no longer current. As such, the decisions made at the time of the review may no longer be valid.

- **The district will revise its improvement plan to include activities to ensure that at a reevaluation planning meeting, the district conducts a review of existing data and makes decisions based on that data that are implemented without undue delay. Implementation of these activities will ensure decisions regarding the need for additional assessments is based on current information. The plan must include an administrative oversight component to ensure the consistent implementation of the activities.**

Conducting a Reevaluation When a Change in Eligibility is Considered - Information obtained through record review determined that reevaluations are not consistently conducted for students eligible for speech and language services when a change in eligibility is considered.

- **The district will revise its improvement plan to include activities to ensure that a reevaluation is conducted prior to changing a student's eligibility status. Implementation of these activities will ensure an appropriately configured IEP team makes eligibility determinations and that the parent is afforded the opportunity to agree or disagree with these eligibility decisions. The plan must include an administrative oversight component to ensure the consistent implementation of the procedure.**

Section VII: Eligibility

Summary of Findings:

During the self-assessment process, the district identified concerns in the areas of the provision of a copy of evaluation reports to parents ten days prior to meetings. **The district's improvement plan is insufficient to address this area because it lacks an administrative oversight component to ensure activities are appropriately implemented. The plan needs to be revised to include this component.**

Additional areas of need were identified during the on-site visit regarding meeting participants, criteria and signatures of agreement/disagreement with eligibility determinations.

Areas of Need:

Criteria - Information obtained through record review determined that preschool age students have been classified as eligible for speech and language services instead of preschool disabled.

- **The district will revise its improvement plan to include activities to ensure that all students of preschool age are classified preschool disabled. These activities must include a mechanism to ensure any previously developed IEP is revised to include the assignment of an appropriate eligibility category.**

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Meeting Participants - Information obtained through record review and interviews determined that regular education teachers do not attend eligibility meetings for preschool age students.

- **The district will revise its improvement plan to include activities to ensure regular education teachers are in attendance at eligibility meetings for preschool age students. Implementation of these activities will ensure decisions are based on input from all required members of the team and to ensure necessary information is obtained to appropriately consider placement options in general education settings with appropriate supports and services. The plan must include an administrative oversight component to ensure the consistent implementation of the activities.**

Signatures of Agreement/Disagreement – Information obtained through record review determined that for students classified eligible for speech and language services, team members do not document their agreement or disagreement with eligibility determinations.

- **The district will revise its improvement plan to include activities to ensure that IEP team members certify in writing their agreement or disagreement with eligibility determinations. Implementation of these activities will ensure parents have the opportunity to see whether all team members are in agreement with eligibility determinations or to see why there is disagreement. The plan must include an administrative oversight component to ensure the consistent implementation of the activities.**

Section VIII: Individualized Education Program (IEP)

Summary of Findings:

During self-assessment the district accurately identified themselves compliant in the areas of annual reviews, teacher access and knowledge and documentation of present levels of educational performance.

During the self-assessment process, the district identified concerns in the areas of meeting participants, ninety-day timelines and goals and objectives aligned with core curriculum content standards. The district's improvement plan is sufficient to address the area of ninety-day timelines and meeting participants. **The district's improvement plan is insufficient to address the area of goals and objectives aligned to the core curriculum content standard because it lacks an administrative oversight component to ensure the consistent implementation of the activities. The plan needs to be revised to include this component.**

Additional areas of need were identified during the on-site visit regarding meeting participants, provision of IEPs to parents prior to implementation, statement of age of majority, required components of the IEP and reconvening IEP meetings.

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Areas of Need:

Meeting Participants - Information obtained through record review and interviews determined that in addition to the areas of need identified in the self assessment, regular education teachers do not attend annual review meetings for students classified eligible for speech and language services and special education teachers have not consistently attended meetings for students in the self-contained alternative program.

- **The district will revise it's improvement plan to include activities to ensure regular and special education teachers attend annual review meetings. Implementation of these activities will ensure decisions are based on information obtained from all required participants. The plan must include an administrative oversight component to ensure the consistent implementation of the activities.**

Statement of Age of Majority - Information obtained through record review determined that age of majority is included in speech only IEPs for students who are seventeen.

- **The district will revise it's improvement plan to include activities to ensure age of majority is documented beginning at least three years prior to the student reaching age eighteen. Implementation of these activities will ensure the parent and adult student are informed of the transfer of rights to the student at age eighteen in a timely manner. The plan must include an administrative oversight component to ensure the consistent implementation of the procedure.**

IEP Implementation - Information obtained through record review and interviews determined that when a parent does not attend an IEP meeting, that IEP is implemented before the parent is provided with notice and/or with a copy of the IEP.

- **The district will revise it's improvement plan to include activities to ensure parents receive notice and a copy of the IEP prior to implementation. Implementation of these activities will ensure the parent is provided with the opportunity to consider the proposed actions and to dispute those actions, if deemed necessary. The plan must include an administrative oversight component to ensure the consistent implementation of the procedure.**

Required Components of the IEP - Information obtained through record review determined that although the IEP is used as notice, it does not include the two IEP review options.

- **The district will revise it's IEP format to ensure the IEP includes all required components of written notice. Implementation of these activities will ensure the parent is made aware of all options regarding implementation of the IEP. It is recommended the district adopt the model IEP format developed by the Office of Special Education Programs.**

Reconvening IEP Meetings - Information obtained through record review determined that IEP meetings are not consistently reconvened when changes are made to the IEP.

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- **The district will revise its improvement plan to include activities to ensure IEP meetings are reconvened when changes are made to the IEP that impact the provision of services. Implementation of these activities will ensure program changes are made by an appropriately configured IEP team and that the parent is afforded the opportunity to either agree or disagree with the proposed changes. The plan must include an administrative oversight component to ensure the consistent implementation of the procedure.**

Section IX: Least Restrictive Environment (LRE)

Summary of Findings:

During self-assessment the district accurately identified themselves compliant in the areas of Oberti documentation, supplemental aids and services, preschool decision-making, and participation in nonacademic and extracurricular activities.

During the self-assessment process, the district identified concerns in the areas of school age continuum and individual decision-making. The barrier identified by the district is a lack of staff and funding to provide additional in-class support options at the high school level. The district's improvement plan is sufficient to address these areas of need.

Additional areas of need were identified during the on-site visit regarding continuum and individual decision-making.

Areas of Need:

Continuum and Individual Decision-Making (school age) – Information obtained through interviews and record review determined that additional program options are needed at the elementary and secondary levels to meet the needs of students. In addition to the needs identified by the district in the self assessment, it was determined that additional in-class support programs need to be provided at the elementary level and pull-out resource programs need to be expanded at the secondary level.

- **The district will revise its improvement plan to include activities to ensure a full continuum of options is available and that placement decisions are based on the individual needs of the students and not on the availability of programs. Implementation of these activities will ensure each student receives the program within a setting that is appropriate to address the individual needs of the student. The plan must include an administrative oversight component to ensure the consistent implementation of the procedure.**

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Section X: Transition to Post-School

Summary of Findings:

Areas of need were identified during the on-site visit regarding age fourteen transition service needs, age sixteen needed transition services, transition components and documentation for students classified eligible for speech and language services.

Areas of Need:

Age Fourteen Transition Service Needs - Information obtained through record review determined that courses of study are not specifically identified. Additionally, neither students nor agency representatives are invited to attend transition meetings for students eligible for speech and language services.

- **The district will revise its improvement plan to include activities to ensure all required components of the statement of transition service needs are appropriately discussed and included in the IEP. Furthermore, the plan must include activities to ensure students and agencies are invited to the meeting. Implementation of these activities will ensure the student is afforded the opportunity to provide input into the plans that are developed leading to the desired post-secondary outcomes as well as ensure agencies have the information that is necessary to provide services to the student during the school career and after, when appropriate.**

Age Sixteen Needed Transition Services - Information obtained through record review determined that the IEP does not identify the post-secondary liaison. Furthermore, activities, goals and benchmarks do not consistently relate to the student's interests and desired post-secondary outcomes.

- **The district will revise its improvement plan to include activities to ensure the transition plan identifies the liaison to post-secondary outcomes and that goals and benchmarks are related to the student's interests and preferences and to the desired post-secondary outcomes. Implementation of these activities will ensure the student has the opportunity to achieve his/her desired post-secondary outcomes.**

IEP Format for Students Eligible for Speech and Language Services – Information obtained through record review determined that the IEP format for students classified eligible for speech and language services does not include transition components.

- **The district will revise its IEP format to include transition components. It is recommended the district adopts the model IEP form developed by the Office of Special Education Programs. Implementation of this activity will ensure the district appropriately plans for the transition needs of all students with disabilities to whatever extent they are needed.**

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Section X: Transition to Preschool

Summary of Findings:

During self-assessment the district accurately identified themselves compliant in the areas of preschool transition planning conference and EIP to preschool disabled by age three.

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

Section X: Discipline

Summary of Findings:

During the self-assessment process, the district identified concerns in the areas of documentation to case manager, procedural safeguards, and manifestation determinations. **The district's improvement plan is insufficient to address these areas of need because it lacks an administrative oversight component to ensure the consistent implementation of the activities. The plan needs to be revised to include this component.**

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

Areas of Need:

Suspension Tracking - Information obtained through interviews and record review determined that team members are not tracking the number of days a classified student is suspended. As a result, some of these students are not receiving programs and services when they are suspended beyond the tenth day.

- **The district will revise its improvement plan to include activities to ensure the case managers track the number of days each student with a disability is removed from program. Implementation of these activities will ensure students receive the programs and services they are entitled to when their removals exceed ten days. The plan must include an administrative oversight component to ensure the consistent implementation of the activities.**

Section XV: Student Records

Summary of Findings:

During self-assessment the district accurately identified themselves compliant in the areas of maintenance and destruction of student records and access upon request.

During the self-assessment process, the district identified concerns in the areas of providing a list of types and location of student records upon parental request. The district's improvement plan is sufficient to address this area of need.

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Additional areas of need were identified during the on-site visit regarding access sheets.

Area of Need:

Access Sheets - Information obtained during record review determined that access sheets are not maintained in speech and language files.

- **The district will revise it's improvement plan to include activities to ensure access sheets are maintained in records for students classified as eligible for speech and language services.**

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Summary

On-site special education monitoring was conducted in the Paulsboro School District on January 20, 21, 22 & 23, 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. The district conducted a review of its procedures and implementation of the procedures during the self assessment process. As a result of that review, the district was able to identify areas of need and develop an improvement plan that with some revision will bring about systemic change.

At a focus group meeting held prior to the monitoring visit, parents expressed their satisfaction while others expressed their concerns with many of the district's programs and services. Parents stated that they were unsure whether students were receiving adequate transition services. Several parents indicated a need for additional instruction in job readiness skills. Parents indicated that the communication between the school and home is generally good. Parents also indicated they were able to visit their children's classrooms. They further reported that they receive invitations to meetings and that the district makes every effort to accommodate parent schedules.

Standards identified as consistently compliant by the district during self assessment and verified during the on site monitoring included State Wide Assessment, Graduation and Program and Services.

Areas identified as consistently compliant by the district during self-assessment and verified during the on-site monitoring visit included policies, procedures, dissemination of IDEA information, length of school day and year, transfer students, facilities, certifications, consent, notice in native language, interpreters at meetings, independent evaluations, child find activities, summer referrals, multi disciplinary assessments, standardized assessments, bilingual evaluations, reevaluation planning meetings and participants, reevaluations by June 30th, annual review timelines, teacher access, documentation of present level of educational performance, Oberti, preschool continuum and individual decision making, supplemental aides and services, participation in non academic and extra curricular activities, preschool transition conference, EIP to preschool by age three, maintenance and destruction of student records and access upon request.

During the self-assessment process, the district identified areas of need regarding staff training, surrogate parents, provision of written notice, identification meeting timelines and participants, acceptance and rejection with rational of reports, three year timelines, copy of evaluation reports to parents ten days prior to the meeting, annual review participants, ninety day timelines, goals and objectives/core curriculum content standards, school age continuum and individual decision making, preschool transition planning conference, EIP to preschool by age three, discipline documentation to case manager, procedural safeguards, manifestation determination and provision of a list of locations and types of records to parents upon request.

The on-site visit identified additional areas of need within the various standards regarding staff training, extended school year, provision of related services, written notice, notice of meetings, referral process, direct referrals, health summary, vision and hearing screenings, preschool referrals, functional assessments, undue delay following consent for reevaluation, conducting a reevaluation when a change in eligibility is considered, eligibility meetings and participants, criteria, signatures of agreement or

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disagreement with eligibility, meeting participants, provision of IEPs to parents prior to implementation, statement of age of majority, required components of the IEP, reconvening IEP meetings, school age continuum and individual decision-making, transition service needs, needed transition services, transition documentation for students eligible for speech and language services, suspension tracking and access sheets.

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