

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

**District:** Pennsauken School District

**County:** Camden

**Monitoring Dates:** February 26, 27, 28, March 1, 2, 2001

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

**Background Information:**

During the 2000-2001 school year, the Pennsauken School District conducted a self-assessment of policies, procedures, programs, services and student outcomes. This self assessment component of the monitoring process provided the Pennsauken School District with an opportunity to evaluate its' strengths and areas of need with regard to:

- The provision of a free and appropriate public education (FAPE) for students with disabilities in the least restrictive environment;
- The protection of procedural safeguards for students and their families;
- The development and implementation of policies and procedures resulting in procedural compliance and;
- The organization and delivery of programs and services resulting in positive student outcomes.

The self -assessment was designed to identify areas of strength, promising practices, areas that need improvement and areas that may be non-compliant with state and federal requirements. The Pennsauken School District developed an improvement plan to address the identified areas.

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

As the first step in the on-site monitoring process, the New Jersey Department of Education held a focus group meeting for parents and community members at the Pennsauken High School on February 20, 2001. From this initial focus group meeting, areas were identified that would later be reviewed during the on-site visit. In addition to these areas, information from previous monitoring activities was available to the team and helped to direct the focus of the monitoring visit.

During the on-site visit, the New Jersey Department of Education monitoring team reviewed district documentation, including district policies and procedures, student count information, master student lists, class lists, schedules of students, teachers and related service personnel, and other relevant information, including a representative sample of student records. Interviews were conducted with the district's special education director, building principals, and child study team members, including the speech/language specialist. Input was also received from parents of students with

disabilities. In addition, six of the eleven school buildings were visited and both general and special education teachers from each school were interviewed.

District compliance with the requirements of the Individuals with Disabilities Education Act (IDEA) and the New Jersey Administrative Code for Special Education (N.J.A.C. 6A: 14) was assessed. Areas identified by the district as compliant were reviewed. Systemic areas of need are identified in the findings below.

**Areas Demonstrating Compliance with all Standards:**

**Graduation** was determined to be an area of compliance by the district during the self-assessment process and by the Office of Special Education Programs (OSEP) during the on-site monitoring.

**I. GENERAL PROVISIONS**

**Summary of Findings:**

The Pennsauken School District adopted the Policies/Statement of Assurances required by the New Jersey Department of Education. The district recently revised their policies to reflect changes since the adoption of N.J.A.C. 6A:14. The district has revised its procedures and has forwarded them to the county office for review and approval.

During self-assessment the district accurately identified themselves compliant with the submission of annual reports to the Office of Special Education Programs and the provision of public documents to parents when requested.

During self-assessment the district identified the need for more training for regular education teachers regarding instruction and modifications and accommodations. The improvement plan is insufficient to address this area of need. The plan must be revised to include a component to determine the need for additional staff development subsequent to the initial in-service sessions and the manner in which the district will evaluate the effectiveness of the training.

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

**Summary of Findings:**

During self-assessment the district accurately identified themselves compliant in the area of length of school day and year, provision of occupational therapy, physical therapy, and speech therapy as required by the IEP, and transfer procedures.

During the self-assessment process, the district identified concerns in the areas of extended school year, provision of counseling and handicap facilities. The district's improvement plan is not sufficient to address these areas of need.

Additional areas of need were identified during the on-site visit regarding facility issues. The county office of education has been notified of all facilities issues.

### **Areas of Need:**

**Provision of Counseling** - The district has identified that counseling is not provided in accordance with students' IEPs. They report that caseloads and counselor schedules impede the district's ability to provide this service consistently. Interviews indicated that counseling is provided on an as needed basis or in crisis situations, only.

- **The district will revise its improvement plan to include procedures to ensure counseling is provided in accordance with IEPs and is based on the individual needs of students. The plan must include a component to ensure the district has the ability to determine whether it has sufficient staff to provide this service. In the event sufficient staff is not available, the plan must include procedures to address these staffing needs.**

**Extended School Year** – The district has identified that only preschool students and those students attending out-of-district placements participate in extended school year programs.

- **The district will revise its improvement plan to include procedures to ensure that extended school year programs are considered and discussed for all classified students and provided, as appropriate. The plan must include a mechanism to ensure these considerations are appropriately documented in each IEP.**

### **III. PROCEDURAL SAFEGUARDS**

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

During self-assessment the district accurately identified themselves compliant in the areas regarding independent evaluations and surrogate parents.

During the self-assessment process the district identified concerns regarding the provision of notice in native languages, notice timelines, documentation of attempts to ensure parental participation at meetings, and age of majority. The district has developed an improvement plan that is sufficient to address the age of majority issue.

Additional areas of need were identified during the on-site regarding the provision of PRISE, referral dates, and meeting participants.

#### **Area of Need:**

**Native Language** - The district determined it does not provide notice to parents in their native language, even when feasible.

- **The district will revise its improvement plan to ensure the provision of written notice in the native language of the parent, when feasible.**

**Written Notice Timelines** - The district determined it does not consistently provide notice within 20 calendar days of the district's receipt of any written parental request to

initiate or change the identification, classification, evaluation, educational placement or the provision of a free, appropriate public education. The district further determined it does not consistently provide written notice within 15 days of a meeting.

- **The district will revise its improvement plan to ensure that notices are provided to parents in a timely manner.**

**Documentation of Attempts** - The district determined it does not consistently document attempts to ensure parental participation at meetings.

- **The district will revise its improvement plan to ensure documentation of district efforts to ensure parents have the opportunity to participate at meetings.**

**Referral Dates** – During the on-site monitoring, a review of the referral forms from the Student Review Committee (SRC) to the Child Study Team indicated dates were not consistently identified on the referral.

- **The district will revise its improvement plan to include procedures to ensure the date of the referral is clearly identified on the referral.**

**Meeting Participants** - During the on-site monitoring, a review of records and interviews indicate that regular education teachers do not consistently attend IEP meetings because of issues related to the district's inability to arrange classroom coverage.

- **The district will revise its improvement plan to include procedures to ensure that all required participants attend meetings. The plan must identify a building level administrator who will be responsible to ensure the participation of staff members within their buildings.**

**PRISE** – During the on-site, a review of records indicated PRISE was not included when notice of meetings were provided to parents.

- **The district will revise its improvement plan to include procedures to ensure that a copy of PRISE is included with the notice of a meeting.**

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

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

During the self-assessment process, the district identified concerns regarding their referral processes, summer referrals, documentation of interventions, identification meetings, identified students, and overrepresentation of minority students in special education. The district's improvement plan is insufficient to address these areas of need.

Additional areas of need were identified during the on-site monitoring regarding child find, and vision and hearing screenings.

## **Areas of Need:**

**Referral Process/Identification Meetings** – The district identified the need to develop procedures for direct referrals to child study teams and to ensure that referrals are processed in a timely manner. The district further indicated their policy and procedures for student resource committees needed to be revised and staff needed to be in-serviced regarding these revised procedures. They also indicated identification meetings are not consistently conducted within 20 days of receiving the referral.

- **The district will revise its improvement plan to ensure referral procedures, including Student Resource Committee procedures, are revised to ensure identification meetings are conducted within 20 days of receiving the referral. The plan must include a component to ensure administrators and staff members are in-serviced regarding these procedures.**

**Summer Referrals** – The district indicated summer referrals are not addressed in a timely manner because staff are not employed during the summer months.

- **The district will revise its improvement plan to ensure it has staff available to conduct required identification and evaluation activities during the summer months.**

**Identified Students** – The district identified they do not have a clear policy or procedure to ensure that when students are identified as potentially disabled, they are afforded the same protections as classified students when disciplinary measures are being considered and/or imposed.

- **The district will revise its improvement plan to ensure identified students are afforded the same protections as classified students when disciplinary measures are being considered and/or imposed.**

**Overrepresentation** – The district indicated it has experienced significant growth during the last several years as a result of families moving into Pennsauken. They further indicated that this increase in population has resulted in an overrepresentation of minority students in special education.

- **To assist the district in its data review and analysis to determine the factors leading to overrepresentation of minorities in special education, the district will participate in technical assistance sessions sponsored by the Office of Special Education during the 2001-2002 school year.**

**Child Find** – During the on-site monitoring visit, the district's procedures for Child Find were reviewed. While activities for preschool students were appropriate, there was no consistent method for informing parents of school aged students of the procedures for accessing child study team services and/or special education.

- **The district will revise its improvement plan to ensure that parents of school aged students are informed of the procedures for accessing child study team and special education services.**

**Vision and Hearing Screenings** - During the on-site monitoring, a review of records and staff interviews indicated that vision and hearing screenings are not completed during the summer months as part of the referral process due to staffing issues.

- **The district will revise its improvement plan to ensure that vision and hearing screenings are completed and provided to the child study team prior to the identification meeting.**

## **V. EVALUATION**

### **Summary of Findings:**

During self-assessment, the district accurately identified themselves compliant in the areas of informed consent, conducting multi-disciplinary assessments, the use of standardized assessments, the use of bilingual evaluations (when need is identified) and acceptance and rejection of reports.

During the self-assessment process, the district identified areas of need regarding speech and language evaluations and functional assessments. The district's improvement plan is insufficient to address these areas of need.

An additional area of need was identified during the on-site regarding the provision of evaluation reports.

### **Area of Need:**

**Speech and Language Evaluation** – During the self-assessment process the district indicated that although speech/language specialists conduct evaluations, written reports of results are not consistently prepared.

- **The district will revise its improvement plan to ensure that speech/language specialists develop written reports of their findings and include all required components.**

**Functional Assessment** - During the self-assessment process the district indicated that evaluations needed to include functional assessments of academic performance and behavior, where appropriate.

- **The district will revise its improvement plan to ensure that functional assessments of academic performance and behavior, where appropriate, are included in evaluations.**

**Evaluation Reports** – During the on-site monitoring, a review of records and interviews with staff members indicated that although parents receive copies of evaluation reports, this provision is not consistently documented.

- **The district will revise its improvement plan to ensure it maintains documentation of the provision of evaluation reports to parents.**

## **VI. REEVALUATION**

### **Summary of Findings**

During self-assessment, the district accurately identified themselves compliant in the areas of planning meetings, parental consent, and turning age five.

During the self-assessment process the district identified an area of need regarding reevaluation timelines. The district's improvement plan is insufficient to address this area of need.

An additional area of need was identified during the on-site visit regarding meeting participants. This area was addressed in Section III.

### **Areas of Need**

**Reevaluation** – During the self-assessment process the district indicated that due to a large number of classified students, the high rate of classified students transferring into the district, and the high number of initial evaluations, reevaluations are not consistently completed within three years of the previous classification.

- **The district will revise its improvement plan to include procedures to ensure reevaluations are conducted within three years of the previous determination of eligibility. The plan must include an identification of issues impacting these reevaluation timelines and activities to address them in an effective manner. The plan must also include an administrative oversight component to ensure full implementation of these procedures.**

## **VII. ELIGIBILITY**

### **Summary of Findings:**

During self-assessment, the district accurately identified themselves compliant with the content of notice of meetings and the provision of the determination of eligibility statement to the parent or adult student.

During the self-assessment process, the district identified areas of need regarding notices, meeting participants (addressed in Section III), and eligibility criteria. The district's improvement plan is insufficient to address these areas of need.

Additional areas of need were identified during the on-site visit regarding the provision of evaluation reports to parents (addressed in Section V) and the provision of procedural safeguards when the eligibility meeting includes the development of an IEP (addressed in Section III).

## **Areas of Need:**

**Notices** - During self-assessment, the district determined that notices of meetings are not consistently provided to parents early enough to ensure they will have an opportunity to attend the meeting.

- **The district will revise its improvement plan to include procedures to ensure notices of meetings are provided to parents early enough to afford parents the opportunity to attend meetings.**

**Eligibility Criteria** – During the self-assessment process, the district determined that they have not identified specific required assessments and a statistical formula to determine students eligible under the specific learning disability (SLD) category.

- **The district will revise its improvement plan to include procedures to ensure the use of appropriate assessments and a statistical formula to determine a severe discrepancy.**

## **VIII. IEP**

### **Summary of Findings:**

During self-assessment, the district accurately identified themselves compliant in the areas of notice, required statements, implementation dates, and goals and objectives that are linked to the Core Curriculum Content Standards.

During the self-assessment process, the district identified concerns with meeting participants (addressed in Section III), annual review timelines, informing staff of their role in implementing the IEP, revisions to behavior intervention plans (BIPs), and identifying the amount and frequency of instructional time that the in-class support resource teacher is present in the classroom. The district's improvement plan is insufficient to address these areas of need.

Additional areas of need were identified during the on-site visit regarding IEP components and considerations.

### **Areas of Need:**

**Annual Review Timelines** - During self-assessment, the district determined that annual review timelines are not consistently met because of the increasing demands to conduct reevaluations, initials, and the need to process transfer students.

- **The district will revise its improvement plan to include procedures to ensure annual reviews are conducted within required timelines. The plan must include an identification of issues impacting these timelines and activities to address them in an effective manner. The plan must also include an administrative component.**



**Roles in Implementing the IEP** – During the self-assessment process, the district determined that regular education staff are not consistently informed of their role and responsibility in implementing IEPs.

- **The district will revise its improvement plan to include procedures to ensure that all staff, including regular education staff, are informed of their roles and responsibilities in implementing IEPs.**

**Documentation of Instructional Time** - During the self-assessment process, the district determined that IEPs do not include the frequency and amount of instructional time the in-class support teacher is present in the classroom.

- **The district will revise its improvement plan to include procedures to ensure IEPs include the amount of time in-class support teachers are present in the classroom.**

**BIP Revisions** – During self-assessment, the district determined that though IEPs include behavioral intervention plans for students whose behavior may impede his/her learning or the learning of others, they do not review and revise the BIP when the plans do not bring about the desired effects.

- **The district will revise its improvement plan to include procedures to ensure BIPs are reviewed and revised, when appropriate.**

**Components and Considerations** – A review of student records indicated the district's IEP, which is used as written notice, does not include options, considerations and other factors regarding proposed actions.

- **The district will revise its IEP format to include the required components of notice if it intends to continue to use the IEP as notice. It is recommended the district adopt the state's model IEP.**

## **IX. LEAST RESTRICTIVE ENVIRONMENT**

During self-assessment, the district accurately identified themselves compliant with student participation in nonacademic and extracurricular activities.

During the self-assessment process the district identified the need for individualized decision-making, a continuum of programs and services including in-class support, and supplementary aides and services. The improvement plan is insufficient to address these areas of need.

### **Area of Need:**

**Decision-Making Process** - During self-assessment, the district indicated that the decision-making process for determining placement options is not based on the individual needs of the students, but is based instead on financial constraints, the category of the disability, and the availability of the program.

- **The district will revise its improvement plan to include procedures to ensure placement decisions are based on the individual needs of students. The plan must include a mechanism to remove the barriers that currently prevent the implementation of an appropriate decision-making process.**

**Placement Options** - During the self-assessment process the district identified that a full continuum of placement options, including in-class support, is not available at all levels even though the need exists.

- **The district will revise its improvement plan to ensure a full continuum of placement options is available to meet the identified individual needs of students.**

**Supplementary Aides and Services** – During self-assessment the district identified that they do not provide the needed variety and range of supplementary aides and services to include students with disabilities in regular classrooms.

- **The district will revise its improvement plan to include procedures to ensure that students with disabilities are provided with a variety of supplementary aides and services, based on their individual needs, to allow them to access services in a general education setting.**

## **X. TRANSITION**

### **Transition from School to Post School**

During self-assessment, the district accurately identified themselves compliant with documenting IEP required statements of transition service needs and needed transition services.

During the self-assessment process, the district identified areas of need regarding the involvement of agencies and community resources in transition meetings, and transition options. The improvement plan is not sufficient to address these areas of need.

Additional areas of need were identified during the on-site visit regarding student interests and preferences and notice to parents.

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

**Transition Service Activities** - During self-assessment, the district identified the need to expand existing transition activities in the areas of career awareness, career exploration, and career preparation.

- **The district will revise its improvement plan to include procedures to ensure it makes available to those students who require them, transition activities in the areas of career awareness, exploration and career preparation.**

**Agency and Community Resources** – During the self-assessment process, the district identified the need to identify and develop additional linkages and partnerships with state agencies and community resources.

- **The district will revise its improvement plan to include procedures to ensure it has established the necessary linkages with state agencies and community resources to provide needed transition services.**

**Interest and Preference Documentation** – During on-site monitoring, review of student records determined that the manner in which student interests and preferences is obtained is not documented in the IEP.

- **The district will revise its improvement plan to include procedures to ensure that the manner in which individual student interests and preferences is obtained is documented in the IEP.**

**Meeting Notice** – During on-site monitoring, review of student records determined that the notice to parents regarding IEP meetings does not state that one of the purposes of the meeting will be to discuss transition services.

- **The district will revise its notice of a meeting to include transition planning as a purpose of the meeting when transition planning is discussed. It is recommended the district adopt the state’s notice forms.**

### **Transition to Preschool**

During the self-assessment process, the district accurately determined themselves to be compliant in the area of transition from Early Intervention Programs to Preschool classes.

An area of need was identified during the on-site visit regarding Preschool Transition Planning Conferences.

#### **Area of Need:**

**Documenting Participation at Preschool Transition Planning Conferences** – Interviews with staff determined that though child study team members consistently attend preschool transition planning conferences, they do not maintain documentation of their attendance.

- **The district will revise its improvement plan to include procedures to ensure child study team members document their attendance at preschool transition planning conferences.**

## **XI. DISCIPLINE**

### **Summary of Findings:**

During the self-assessment process, the district accurately determined themselves to be compliant regarding Interim Alternative Education Settings (IAES).

During the self-assessment process, the district identified areas of need regarding notification to case managers, behavior intervention plans and functional assessments. The improvement plan is not sufficient to address these areas of need.

An additional area of need was identified during on-site monitoring regarding manifestation determination meetings.

### **Areas of Need:**

**Notification of Case Managers** - During the self-assessment process the district determined that although procedures were developed for notifying case managers of disciplinary infractions, the inconsistent implementation by school administrators resulted in a delay in notifying case managers when a student was being removed.

**Functional Behavioral Assessments and Behavior Intervention Plans** – During the self-assessment process the district indicated that the Child Study Teams were not conducting FBAs or developing BIPs because of the inconsistent manner in which they are being notified of suspensions.

**Manifestation Determination** – During the self-assessment process, the district determined that as a result of the district's inconsistency in tracking suspensions, manifestation determination meetings are not consistently conducted.

- **The district will revise its improvement plan to include oversight procedures to ensure the consistent and timely notification of case managers in the event a classified student is removed from program. This plan must also ensure team members conduct functional behavior assessments and develop behavior intervention plans, when appropriate, as well as conduct manifestation determination meetings when the removal constitutes a change in placement.**

## **XII. STATEWIDE ASSESSMENT**

### **Summary of Findings:**

During the self-assessment process, the district accurately determined themselves to be compliant with student participation in statewide assessments.

During the self-assessment process, the district identified an area of need regarding the special review assessment (SRA) process. The improvement plan is not sufficient to address this area of need.

An additional area of need was identified during the on-site monitoring regarding alternative assessment.

**Areas of Need:**

**Student Review Assessment** – During the self-assessment process the district indicated that they do not utilize the SRA process, even when appropriate.

- **The district will revise its improvement plan to include procedures to ensure the use of the SRA process, when that process is appropriate.**

**Alternative Assessment** – During on-site monitoring review of IEPs and interviews with staff members, it was indicated that IEPs do not identify an alternative assessment when students are exempted from participating in statewide assessments.

- **The district will revise its improvement plan to ensure the adoption of an alternate assessment until such time the Office of Special Education Programs develops one. The plan must include a mechanism to ensure that assessment is identified in the IEP.**

#### **XIV. PROGRAMS AND SERVICES**

**Summary of Findings:**

During the self-assessment process, the district accurately determined themselves to be compliant with appropriate age ranges in the classrooms, home instruction and certification.

During the self-assessment process the district identified areas of need regarding common planning time, class size, supplementary instruction, and special class descriptions. The improvement plan is not sufficient to address these areas of need.

An additional area of need was identified during on-site monitoring regarding placements of high school students.

**Areas of Need:**

**Common Planning Time** - During the self- assessment process the district identified that they do not provide common planning time for general education and special education teachers.

- **The district will revise its improvement plan to ensure teachers have common planning time.**

**Class Size** - During the self-assessment process the district identified that group sizes exceed the limit designated in the code for support resource programs, in-class replacement, and pull-out replacement resource programs.

- **The district will revise its improvement plan to ensure its resource center programs comply with group sizes required by code.**

**Supplementary Instruction** - During the self-assessment process the district identified that supplementary instruction is not provided when required by IEPs.

- **The district will revise its improvement plan to ensure it provides supplementary instruction when required by IEPs.**

**Special Class Description** - During the self-assessment process the district identified that they have not submitted a description of each special class program to the county office.

- **The district will develop and submit a description of its special class programs to the county office.**

**Class Placements** - During the on-site monitoring it was determined that some students at the high school were not placed in programs required by their IEPs.

- **The district will revise its improvement plan to ensure each student is placed in a program required by the IEP. The plan must include an administrative oversight component to ensure implementation of these procedures.**

## **XV: STUDENT RECORDS**

### **Summary of Findings:**

During the self-assessment process, the district accurately determined themselves to be compliant with access to student records, access sheets, maintenance and destruction.

During the on-site visit, an additional area of need was identified regarding the location of other records.

### **Area of Need:**

**Location of Student Records** - A review of central files indicated the district does not document the location of other student files in the central files.

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

## **SUMMARY**

An on-site special education monitoring was conducted in the Pennsauken School District on February 26-28 and March 1-2, 2001. The purpose of the monitoring was to verify the district's report of findings resulting from self- assessment and to determine the appropriateness of the district's improvement plan. As a result of the thorough and comprehensive review conducted by the district during the self-assessment process, the district was able to self-identify a number of areas that require improvement.

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

During the self-assessment process, the district identified areas of need regarding training for regular education teachers, extended school year, counseling, facilities, native language, timelines, documentation of parental participation and interventions, age of majority, referral processes, speech and language evaluations, functional assessments, timelines for reevaluations, notices, meeting participants, eligibility criteria, IEP components, access to regular education, continuum of programs and services, supplementary aides and services, transition, suspensions, common planning time, class size, and supplementary instruction.

The on-site visit further identified areas of need regarding child find procedures, timelines, vision and hearing screenings, identification meetings, written reports, meeting participants, provision of PRISE and reports, IEPs, participation at meetings, discipline issues, and the location of other records.

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