

New Jersey Department of Education Special Education Monitoring

District: Rahway School District **County:** Union

Monitoring Dates: May 29 and 30, 2002

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Background Information:

During the 2000–2001 school year, the Rahway School District conducted a self-assessment of policies, procedures, programs, services, and student outcomes. This self-assessment component of the monitoring process provided the Rahway 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 Rahway School District developed an improvement plan to address their 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, on April 11, 2002. 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 special education supervisor, building principals, speech/language therapists, general and special education teachers, child study team members, and parents.

District Strengths:

The Rahway School District is commended for the following unique programs:

The "Special Eyes on the Environment" (S.E.E.) Photography Program – This program provides an opportunity each year for 20 special education students to learn

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about the environment through photography. Each student is provided with a camera to use on field trips throughout the community. The students' black and white photographs are being exhibited this year at the State Capital, in Trenton.

Behavioral Health and Psychiatry Counseling Program – The district contracts with Trinitas Hospital to provide students and families with short-term individual therapy sessions. The objectives of the program are to reduce the number of students suspended, while increasing the number of special education students who receive educational services in a general class. In addition, the program seeks to reduce the number of students referred for evaluation and to reduce the number of classified students being placed in special day schools. Counseling is also provided through this program. Therapists in the program consult with teachers and classroom aides to provide recommendations for supporting students with emotional or behavioral problems in the classroom.

Rahway School District After-School Tutoring Program – The district provides general and special education students, at all grade levels, with the opportunity to get help with their homework after school. The tutoring is provided by both general and special education teachers, at three locations, every Tuesday and Thursday.

Section I: General Provisions

Summary of Findings:

During self-assessment the district accurately identified themselves compliant in the areas of Policy and Procedures and public information. The required Statement of Assurances and the district 's procedures have been submitted to the county office.

During the self-assessment process, the district identified concerns regarding professional/paraprofessional in-service, related to the needs of students with disabilities. The district has developed an improvement plan that is sufficient to address this area of need.

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/year, facilities, certifications, documentation of goals and objectives, and frequency, duration and location of related services.

During the self-assessment process, the district identified concerns regarding procedures for transfer students, extended school year and adaptive physical education. The district has developed an improvement plan that is sufficient to address these areas of need.

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

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Section III: Procedural Safeguards

Summary of Findings:

During self-assessment the district accurately identified themselves compliant in all areas of consent, content/provision of Notice of a Meeting, convening meetings, and independent evaluations.

During the self-assessment process, the district identified concerns regarding the selection and training of surrogate parents, contents of Written Notice, notices in native language, and translators at meetings. The district has developed an improvement plan that is sufficient to address these areas of need.

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

Section IV: Location, Referral and Identification

Summary of Findings:

During self-assessment the district accurately identified themselves compliant in the areas of direct referrals from staff/parent(s), health summary, vision/hearing screenings, and participants at identification meetings.

During the self-assessment process, the district identified a concern regarding the 20-day timeline for convening an identification meeting. The district has developed an improvement plan that is sufficient to address this area of need. The district further identified areas of need regarding pre-referral interventions, written documentation of interventions and effectiveness of interventions. The district has developed an improvement plan that does not sufficiently address these areas of need because it lacks procedures and an administrative oversight component to bring about the required changes. The plan needs to be revised to include these elements.

An additional area of need was identified during the on-site monitoring visit regarding child find.

Areas of Need:

Child Find – During the on-site monitoring it was determined that although the district conducts Child Find activities for students ages 3-5, the activities do not extend to students ages 6-21, nor to migrant or homeless students.

- **The district will revise the improvement plan to include procedures to ensure that child find activities include students ages 6-21 and migrant and homeless students throughout the year including the summer months.**

Section V: Protection in Evaluation and Evaluation Procedures

Summary of Findings:

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During self-assessment the district accurately identified themselves compliant in the areas of bilingual evaluations and acceptance/rejection of outside reports.

During the self-assessment process, the district identified areas of need regarding evaluations for students eligible for speech/language services and components of functional assessments. The improvement plan is sufficient to address these areas of need. The district further identified concerns regarding multidisciplinary evaluations, nature and scope for students eligible for speech/language services, appraisal of students' current functioning, non-individualized evaluation procedures for students eligible for speech/language services, and bilingual evaluations. The district has developed an improvement plan that does not sufficiently address these areas of need because it lacks procedures, inservice and an administrative oversight component to bring about the required changes. The plan needs to be revised to include these elements.

An additional area of need was identified during the on-site monitoring visit regarding written reports.

Areas of Need:

Written Reports – During the on-site monitoring visit, it was determined that assessment reports are not consistently dated.

- **The district will revise the improvement plan to include procedures to ensure that all assessment reports are dated. The plan must include an administrative oversight component to ensure implementation of the procedures.**

Section VI: Reevaluation

Summary of Findings:

During self-assessment the district accurately identified themselves compliant in the areas of participants at reevaluation meetings and reevaluations completed by June 30th of the student's last year in preschool.

During the self-assessment process, the district identified a concern regarding the three-year timeline for reevaluations. The district has developed an improvement plan that is sufficient to address these areas of need.

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

Section VII: Eligibility

Summary of Findings:

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

During the self-assessment process, the district identified concerns regarding the appropriate use of eligibility categories and the need to develop a statistical formula for specific learning disability (SLD). The district has developed an improvement plan that is sufficient to address these areas of need.

An additional area of need was identified during the on-site monitoring visit regarding statement of eligibility for SLD.

Areas of Need:

Statement of Eligibility for Specific Learning Disability (SLD) – During the on-site monitoring visit, it was determined that eligibility statements for specific learning disability (SLD) do not consistently identify the specific area(s) of the severe discrepancy between a student's current achievement and intellectual ability.

- **The district will revise the improvement plan to include procedures to ensure that eligibility statements for SLD include all the required components as required by NJAC 6A:14-3.5 (c) 3iii. The improvement plan must include an administrative oversight component to ensure the implementation of the procedures.**

Section VIII: Individualized Education Program (IEP)

Summary of Findings:

During self-assessment the district accurately identified themselves compliant in the area of 90-day timeline for implementation of IEPs.

During the self-assessment process, the district identified concerns regarding individualized IEPs, discussion of students' lack of expected progress toward annual goals, Present Levels of Educational Performance statements (PLEPs), and goals/objectives aligned with the Core Curriculum Content Standards (CCCS). The district has developed an improvement plan that does not sufficiently address these areas of need because it lacks procedures, inservice and an administrative oversight component to bring about the required changes. The plan needs to be revised to include these elements. The district further identified teacher responsibility in implementing students' IEPs and the provision of annual reviews to parents as areas of need. The district has developed an improvement plan that is sufficient to address these areas of need.

Additional areas of need were identified during the on-site monitoring visit regarding IEP meeting participants and components/required statements.

Areas of Need:

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IEP Meeting Participants – During the on-site monitoring visit, it was determined that although general education teachers attend IEP meetings for in-class support students, general education teachers are not consistently invited to IEP meetings for students in other placements. Furthermore, for those students in self-contained classes who participate in general education electives/specials such as business, computer, art and music, the participation page of the IEP includes the statement: “the participation of a general education teacher is not necessary, as it is agreed that academic mainstreaming is not a consideration at this time.”

- **The district will revise the improvement plan to include procedures to ensure that general education teachers participate at meetings where their participation is required. Furthermore, the district must remove the statement from the IEPs of students who are participating in general education programs that the participation of a general education teacher at the IEP meeting is not required. The improvement plan must also include an administrative oversight component to ensure the implementation of the procedures.**

Considerations/Required Statements – During the on-site monitoring visit, it was determined that the district’s IEP format does not contain many of the required components and statements.

- **The district will revise the improvement plan to include procedures to ensure that the district’s IEP format contains all components and required statements. It is recommended that the district use the IEP format developed by New Jersey Department of Education, Office of Special Education Programs.**

Section IX: Least Restrictive Environment (LRE)

Summary of Findings:

During the self-assessment process, the district identified concerns regarding the individualized decision-making process, considerations of supplementary aids/services and the consideration of program/placement changes as needed throughout the year. The district has developed an improvement plan that does not sufficiently address these areas of need because it lacks procedures and an administrative oversight component to bring about the required changes. The plan needs to be revised to include these elements. The district further identified concerns regarding the continuum of programs at every grade level and participation in non-academic/extra-curricular activities. The district has developed an improvement plan that is sufficient to address these areas of need.

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

Section X: Transition – Transition from School to Post-School

Summary of Findings:

During the self-assessment process, the district identified concerns regarding the Statements of Needed Transition Services and Transition Service Needs, agency

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linkages, alternative strategies to meet transition objectives, monitoring the implementation of transition services, post-school outcomes, community experiences, employment, and career awareness. The district has developed an improvement plan that does not sufficiently address these areas of need because it lacks procedures, inservice and an administrative oversight component to bring about the required changes. The plan needs to be revised to include these elements. The district further identified students' interests and preferences, participation of vocational personnel, agency, students at transition meetings as areas of need, and has developed an improvement plan that is sufficient to address these areas of need.

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

Section X: Transition – Transition to Preschool

Summary of Findings:

During self-assessment the district accurately identified themselves compliant in the area of pre-school transition planning conferences.

During the self-assessment process, the district identified concerns regarding implementation of programs by the student's third birthday. The district has developed an improvement plan that is sufficient to address this area of need.

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

Section XI: Discipline

Summary of Findings:

During self-assessment the district accurately identified themselves compliant in the area of procedural safeguards for potentially disabled students.

During the self-assessment process, the district identified concerns regarding written notification to the case manager, functional behavioral assessments, behavioral interventions plans, and short-term removals. The district has developed an improvement plan that is sufficient to address these areas of need. The district further identified concerns regarding 45-day placements and interm alternative educational settings (IAES). The district has developed an improvement plan that does not sufficiently address these areas of need because it lacks procedures and an administrative oversight component to bring about the required changes. The plan needs to be revised to include these elements.

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

Section XII: Statewide Assessment

Summary of Findings:

During self-assessment the district accurately identified themselves compliant in the area of Alternate Proficiency Assessment.

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During the self-assessment process, the district identified concerns regarding the inclusion of students with disabilities in statewide assessments with appropriate modifications and accommodations. The district has developed an improvement plan that does not sufficiently address this area of need because it lacks procedures and an administrative oversight component to bring about the required changes. The plan needs to be revised to include these elements. The district further identified concerns regarding the alternate assessment and staff knowledge of the content of statewide assessments. The district has developed an improvement plan that is sufficient to address these areas of need.

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

Section XIII: Graduation

Summary of Findings:

During self-assessment the district accurately identified themselves compliant in the areas of Written Notice of Graduation, choice of diploma and participation in graduation activities for out-of-district students.

An additional area of need was identified during the on-site monitoring visit regarding the HSPA.

Areas of Need:

High School Proficiency Assessment (HSPA) – During the on-site monitoring visit, it was determined through record review and staff interviews that the HSPA is not included as a graduation requirement in the annual review IEPs for students transitioning from eighth grade into high school. Furthermore, high school IEPs do not consistently include a rationale when a student is exempt from passing the HSPA as a component of the graduation requirements.

- **The district will revise the improvement plan to include procedures to ensure IEPs include the HSPA as a graduation requirement for those students who are not exempt from taking and/or passing it. The plan must also ensure IEPs include a rationale for exemption when it is determined a student is exempted from passing the HSPA.**

Section XIV: Programs and Services

Summary of Findings:

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

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During the self-assessment process, the district identified concerns regarding the need to employ sufficient staff and consultation time for general and special education teachers. The district has developed an improvement plan that is sufficient to address these areas of need.

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

Section XV: Student Records

Summary of Findings:

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

During the self-assessment process, the district identified concerns regarding the need for staff to be familiar with the policies and procedures of student records. The district has developed an improvement plan is sufficient to address this area of need.

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

Areas of Need:

Documentation of Other Locations of Records – During the on-site monitoring visit, it was determined that the district does not consistently document the locations of other student records in the central files.

- **The district will revise the improvement plan to include procedures to ensure the district identifies the location of other records maintained by the district in the central files.**

Summary

On-site special education monitoring was conducted in the Rahway School District on May 29 and 30, 2002. The purpose of the monitoring visit was to verify the district's report of findings resulting from their self-assessment and to review the district's improvement plan. The district is commended for the exceptionally comprehensive review conducted during the self-assessment process. As a result of this review the district was able to identify nearly all areas of need and develop an improvement plan

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that, with some revision, will be sufficient to bring about systemic change. The district is further commended for the many areas that were determined by the district and verified by the Office of Special Education Programs as compliant with federal and state statutes and regulations.

At a focus group meeting held prior to the monitoring visit, the six parents that attended expressed their satisfaction with the communication between parents and staff, as well as with many of the district's programs and services. Parents did identify such concerns as teachers not providing accommodations and modifications in some of the advanced classes, preschool programs, students with disabilities being placed in classes with students who have behavior problems, delays in evaluating students and extended school year. Importantly, many of the concerns raised by the parents during the focus group meeting had already been identified by the district during the self-assessment process.

Areas identified as consistently compliant by the district during self-assessment and verified during the on-site monitoring visit included the Policy and Procedures, public information, length of school day/year, facilities, certifications, documentation of goals and objectives, frequency, duration, location of related services, all areas of consent, content/provision of Notice of a Meeting, convening meetings, independent evaluations, direct referrals from staff/parent(s), health summary, vision/hearing screenings, participants at identification meetings, bilingual evaluations, accept/rejection of outside reports, participants at reevaluation meetings, reevaluations completed by June 30th of the student's last year in preschool, participants at the eligibility conference, provision of evaluation reports to parents, 90-day timeline for implementation of IEPs, pre-school transition planning meetings, procedural safeguards for potentially disabled students, Alternate Proficiency Assessment, Written Notice of Graduation, choice of diploma, participation in graduation activities for out-of-district students, class-size, group sizes for speech, age-range, home instruction, access/requests for student records, and maintenance/destruction of student records.

During the self-assessment process, the district identified areas of need regarding professional/paraprofessional in-service training, extended school year, adaptive physical education, transfer procedures, selection and training of surrogate parents, contents of written notice, 20-day timelines, native language, translators at meetings, pre-referral interventions, written documentation of interventions, effectiveness of interventions, multi-disciplinary evaluations, nature and scope for students eligible for speech/language services, appraisal of students' current functioning, functional assessments, non-individualized evaluation procedures for students eligible for speech/language services, bilingual evaluations, reevaluation timelines, inappropriate use of eligibility categories, development of a statistical formula for specific learning disability, individualized IEPs, the discussion of students' progress towards annual goals, Present Levels of Educational Performance statements, goals/objectives aligned with the Core Curriculum Content Standards, teacher responsibility in implementing students' IEPs, the provision of IEPs to parents, the individualized decision-making process, consideration of supplementary aids/services, consideration of programs/placement changes, the continuum of programs at every grade level, non-academic and extra-curricular activities, Statements of Needed Transition Services/Transition Service Needs, agency linkages, alternative strategies to meet transition objectives, monitoring the implementation of transition services, post-school outcomes, community experiences, employment/career awareness, interest/preferences, participation of vocational personnel, agency/student at transition meetings, implementation of program

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by student's third birthday, written notification to the case manager, functional behavioral assessments, behavioral intervention plans, short-term removals, exceeding the 45-day time limit, interim alternative educational settings, including students with disabilities in statewide assessments, alternate assessment, staff knowledge regarding contents of statewide testing, sufficient staffing, collaborative time for general and special education teachers, and the need for staff to be familiar with policies and procedures regarding student records. The district is commended for revising many of their improvement plans and beginning to implement activities to correct many of the self-identified issues prior to the on-sight monitoring.

The on-site visit identified additional areas of need within the various standards regarding child find activities, written reports, statement of eligibility for specific learning disability, IEP meeting participants, considerations/required statements, High School Proficiency Assessment, and documentation of other locations of records.

Within forty-five days of receipt of the monitoring report, the Rahway School District will revise and resubmit the improvement plan to the Office of Special Education Programs to address the areas of need identified during the on-site visit and those areas that require revisions.