

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

**District:** Shiloh School District

**County:** Cumberland

**Monitoring Dates:** November 26, 27, and 28, 2001

**Monitoring Team:** Caryl Carthew, Barbara Ciancaglini, Patricia Fair, Julia Harmelin, and Arlene Popovici

### **Background Information**

During the 2000 – 2001 school year, the Shiloh School District conducted a self-assessment of special education policies, procedures, programs, services, and student outcomes. This self-assessment component of the monitoring process provided the Shiloh 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 Shiloh School District developed an improvement plan to address identified areas of need.

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

As the first step in the on-site monitoring process, the NJDOE held a focus group meeting for parents and community members at Cumberland Regional High School on November 5, 2001. Although no parents attended this meeting, information was obtained from parents through alternate means. This information was used to direct the focus of the monitoring visit.

During the on-site, 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 administrator, building principals, general education and special education teachers, child study team members, and parents.

### **District Strengths:**

The district has entered into a consortium agreement with four other school districts in Cumberland County with respect to special education services. One director, three child

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study team members, and two speech-language therapists provide evaluation and case management services, in addition to related services. Regional programs have been established in-district and are open to special education students within the consortium. This has enabled the district to reduce the number of out-of-district placements for students requiring self-contained programs.

District personnel indicate that the director and child study team members are highly accessible to staff. These individuals provide staff development programs and consultation regarding both classified and at-risk students. All staff members who were interviewed praised the efforts of the child study team and reported that they are a valuable resource and source of support for instructional staff.

The director and child study team maintain an accurate database of information on classified students, which enables them to manage timelines and data collection in an efficient manner. In addition, the director encourages the child study team to explore other technology resources, including techniques for analyzing pupil behavior, as a support to instructional staff.

The district operates several innovative programs, including the Shiloh Sun. This is a student-developed newsletter whose staff includes students in special education programs. This newsletter is distributed to members of the community.

The district operates a reading-mentoring program that pairs upper and lower grade students in an effort to foster reading skills. The district also operates a grant funded after school remedial reading program that is open to all students.

The district should be commended for its commitment to establishing and maintaining programs that address the individual needs of students with disabilities.

### **Area Demonstrating Compliance With All Standards:**

**Reevaluation, LRE, Graduation and Transition for Preschool** 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 special education policies and dissemination of IDEA information.

During the self-assessment process, the district identified concerns in the area of professional development. The district's improvement plan includes activities, which are sufficient to address this area of need, however the timelines for completion must be revised to ensure implementation in a more timely fashion.

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

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### Section II: F.A.P.E.

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

During self-assessment the district accurately identified themselves compliant in the areas of length of school day/year, facilities and the provision of speech and counseling.

During the self-assessment process, the district identified concerns in the areas of transfer procedures, OT and PT services, and certification. The district's improvement plan is sufficient to address these issues.

An additional area of need was identified during the on-site visit regarding extended school year.

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

**Extended School Year-** Interviews with staff members indicate that extended school year, although documented in student IEPs, is not consistently discussed at IEP meetings.

- **The district will revise its improvement plan to include procedures to ensure that extended school year is considered and discussed for all students.**

### Section III: Procedural Safeguards

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

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

During the self-assessment process, the district identified concerns in the areas of surrogate parents and notice of a meeting for transition planning. The district's improvement plan is sufficient to address these issues. In addition, the district identified concerns with IEP meeting participants. The district's improvement plan was insufficient to address this issue because it lacks procedures to ensure the required changes. The plan needs to be revised to include these procedures and an administrative oversight component to ensure implementation of the procedures.

Additional areas of need were identified during the on-site visit regarding written notice of proposed action for initial evaluations and reevaluations and components of written notice of speech-language evaluations.

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

**Written Notice of Initial Evaluations and Reevaluations** - During on-site monitoring, interviews with staff indicate that although appropriate personnel are present at evaluation planning meetings, the signatures of participants are not maintained. In

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addition, although parents receive notice of the determination not to evaluate, the district does not maintain documentation of this notice in the file.

- **The district will revise its improvement plan to include procedures to ensure signatures of meeting participants and the provision of written notice is maintained in student files. The plan must include an administrative oversight component to ensure implementation of these procedures.**

**Written Notice of Speech-Language Evaluations** - During on-site monitoring, a review of speech-language written notice of the nature and scope of the evaluation determined the following components to be missing: an explanation of why the district is taking such action; a description of procedures, tests, records or reports and factors considered in making this determination; a description of other options, other than evaluation, discussed and the reason why they were rejected; and a description of other factors relevant to the proposed action. Additionally, during the on-site, it was identified the district does not have a mechanism in place to have an administrator oversee implementation of speech and language procedures. Oversight is limited to building principals ensuring speech and language services are provided to students in their buildings. As such, numerous procedural areas of need have been identified regarding compliance with speech and language regulations.

- **The district will revise its improvement plan to include procedures to ensure written notice of the nature and scope of the speech-language evaluation includes all required components of written notice. The plan must include an administrative oversight component to ensure implementation of these procedures. It is recommended the district adopt the notice forms developed by the Department of Education, Office of Special Education Programs.**

### **Section IV: Location, Referral, Identification**

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

During self-assessment the district accurately identified themselves compliant in the areas of Child Find for preschool, referral process, direct referrals from parents and staff, summer referrals, health summaries, vision/hearing screenings, identification meeting participants, and identification meeting timelines.

During the self-assessment process, the district identified concerns with documentation of interventions attempted prior to making referrals to the child study team. The district's improvement plan is sufficient to address this issue, including plans for establishment of an Intervention and Referral Service (I & RS) committee. As a result of on-site monitoring, however, it was determined that this plan has not yet been implemented, despite the efforts of the special services department to provide suggestions for tools, such as AIMS (Academic Intervention Monitoring System), for documenting the process. The district must implement the activities identified in this plan.

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Additional areas of need were identified during the on-site visit regarding speech-language referrals and Child Find for school-aged students.

### **Areas of Need:**

**Speech-Language Referrals** - During on-site monitoring, interviews with speech-language personnel indicate that when referrals for language are made, these referrals are only made to the child study team when the language concerns are considered severe in nature.

- **The district will revise its improvement plan to include procedures to ensure that any referral for a potential language disability is forwarded to the child study team. The plan must include an administrative oversight component to ensure implementation of these procedures.**

**Child Find for School-Aged Students** - During on-site monitoring, a review of district procedures and other documentation indicate that the district is not conducting Child Find activities for school age students.

- **The district will revise its improvement plan to include procedures to ensure that Child Find activities are conducted for all students between the ages of three and twenty-one. The plan must include an administrative oversight component to ensure implementation of these procedures.**

### **Section V: Evaluation**

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

During self-assessment the district accurately identified themselves compliant in the areas of multi-disciplinary assessments, use of standardized assessments, functional assessments, bilingual evaluations, and acceptance/rejection of reports.

During the self-assessment process, the district identified concerns in the areas of written reports. The district's improvement plan is sufficient to address these issues.

Additional areas of need were identified during the on-site visit regarding written reports and speech-language functional assessments.

### **Areas of Need:**

**Written Reports** - During the on-site monitoring, it was determined that child study team reports are not consistently dated.

- **The district will revise its improvement plan to include procedures to ensure that Child Study Team reports are consistently dated. The improvement plan must include an administrative oversight component to ensure the implementation of this procedure.**

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**Functional Assessments** - During on-site monitoring, it was determined that speech-language specialists do not consistently conduct functional assessments that include student observations, teacher and parent interviews, and a review of the developmental history of the student.

- **The district will revise its improvement plan to include procedures to ensure that speech-language specialists conduct functional assessments that include all required components. The plan must include a training component and an administrative oversight component to ensure the implementation of these procedures.**

### **Section VII: Eligibility**

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

During self-assessment the district accurately identified themselves compliant in the areas of eligibility meetings, meeting participants, criteria for determining eligibility, documentation of eligibility, and the provision of evaluation reports to parents.

An area of need was identified during the on-site visit regarding speech procedures for the provision of a copy of evaluation reports to parents.

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

**Copy of Speech Evaluation Reports to Parents** - During the on-site monitoring, interviews with speech-language personnel it was determined that although evaluation reports are provided to parents, the district does not maintain documentation of this provision.

- **The district will develop an improvement plan to include procedures to ensure the district maintains documentation of the provision of speech/language reports top parents. The improvement plan must include an administrative oversight component to ensure the implementation of these procedures.**

### **Section VIII: Individual Education Program**

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

During self-assessment the district accurately identified themselves compliant in the areas of considerations and required statements, implementation dates, annual review timelines, 90-day evaluation timelines and teacher access to IEPs.

During the self-assessment process, the district identified concerns in the areas of IEP goals and objectives and their alignment to the Core Curriculum Content Standards (CCCSs) and transfer of rights at the age of majority. The district's improvement plan is sufficient to address these issues. In addition, the district identified concerns with the development of goals and objectives fir related services. The district's improvement plan

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is insufficient to address this issue because it lacks an administrative component to ensure implementation of the procedures. The plan needs to be revised to include this component.

An additional area of need was identified during the on-site visit regarding components of speech-language IEPs.

### **Area of Need:**

**Speech-Language IEPs** - During on-site monitoring, a review of speech language IEPs indicated the following components are missing: the strengths of the student; parental concerns; language needs for a student with limited English proficiency; communication needs of the student; needs for a student who is deaf or hard of hearing; the need for assistive technology; the extent to which the student shall not participate with non-disabled students; implementation date for services; whether services are to be provided individually or in small group; and a statement of transition service needs, when appropriate, for students turning age 14.

- **The district will revise its improvement plan to ensure speech-language IEPs include all required components. The plan must include an administrative oversight component to ensure implementation of the procedures. It is recommended the district adopt the model IEP form developed by the Department of Education, Office of Special Education Programs.**

### **Section X: Transition from School to Post-School**

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

During the self-assessment process, the district accurately identified themselves compliant in the areas of agency invitation and courses of study.

During the self-assessment process, the district identified concerns in the areas of consideration of the need for technical consultation, agency involvement, student invitations, and career guidance activities. The district's improvement plan is sufficient to address these issues. In addition, the district indicated that during the IEP process teams do not consider a variety of community experiences. The improvement plan does not address this issue. The plan needs to be revised to include procedures to bring about the required changes.

An additional area of need was identified during the on-sight monitoring visit regarding student interests and preferences.

#### **Area of Need**

**Student Interests and Preferences** - During the on-site visit, interviews with staff and a review of student records indicated that information regarding student interests and preferences is obtained primarily through student interviews at the time of the IEP meeting. However, this interview process is not documented in the student file.

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Additionally, there is no documentation to identify the manner in which this information is obtained when the student does not attend the meeting.

- **The district will revise its improvement plan to include procedures to ensure that information regarding student interests and preferences is obtained and documented in the student file.**

### **Section XI: Discipline**

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

During self-assessment the district accurately identified themselves compliant in the areas of discipline procedures, manifestation determinations, and placement in interim alternative education settings.

During the self-assessment process, the district identified concerns in the areas of notification to the case manager, suspension tracking, conducting functional behavioral assessments, and the development of behavior intervention plans. The district's improvement plan is sufficient to address these issues.

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

### **Section XII: Statewide Assessment**

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

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

During the self-assessment process, the district identified concerns in the areas of alternate assessments. The district's improvement plan is sufficient to address this issue.

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

### **Section XIV: Programs and Services**

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

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

During the self-assessment process, the district identified a concern in the area of descriptions of special class programs. The district's improvement plan is sufficient to address this issue.



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

### **Section XV: Student Records**

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

During self-assessment the district accurately identified themselves compliant in the areas of procedures for maintenance and destruction of records.

During the self-assessment process, the district identified concerns in the areas of parent/adult access to records and documenting access to pupil records. The district's improvement plan is sufficient to address these issues.

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

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

**Documentation of Locations** - On-site record review and interviews with district personnel indicate that the location of other records maintained by the district is not identified in central files.

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

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### **Summary**

On-site special education monitoring was conducted in the Shiloh School District on November 26, 27, and 28, 2001. 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 thorough and 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 that with some revision, will be sufficient to bring about systemic change. In addition, the district is 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. In addition, the district is commended for its efforts relative to the establishment of a consortium agreement for special education and related services leading to a greater number of students remaining in-district in regional programs, provision of a high quality of child study team and case management services, and maintenance of an accurate and reliable special education database of student information. The district is further commended for its implementation of innovative school programs, such as the Shiloh Sun newsletter, the reading mentor program, and the after-school remedial reading program, which are all open to both disabled and non-disabled students.

Although no parents attended the focus group meeting, phone contacts with parents indicated satisfaction with the district's programs and services.

Areas identified as consistently compliant by the district during self-assessment and verified during the on-site monitoring visit included length of school day/year, facilities, provision of speech and counseling services, Child Find, referrals, timelines for notice and evaluations, reevaluations, transition to preschool, components of assessments, native language, procedures for conducting bilingual and/or independent evaluations, student participation in statewide assessment, provision of compliant special education programs and services, individualized decision-making and continuum of services, and procedures for maintenance and destruction of confidential pupil records.

During the self-assessment process, the district identified areas of need regarding professional development, filling needed vacancies for OT/PT services, procedures for surrogate parents, documentation of interventions and the need to establish a consistent pre-referral process, IEP goals and objectives and the alignment of goals and objectives to the CCCSs, components of transition, and discipline.

The on-site visit identified additional areas of need within the various standards regarding numerous speech-language requirements, documentation of written notice of evaluation, consideration of the need for extended school year services for all students, and documentation of locations of other student records.

Within forty-five days of receipt of the monitoring report, the 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 to the improvement plan.

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