

New Jersey Department Of Education Special Education Monitoring

District: Vineland Public Schools **Monitoring Dates:** April 10 – 19, 2000

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Background Information

On March 13, 2000, prior to the monitoring visit, NJDOE facilitated a public focus group meeting with the Vineland community. Approximately 80 parents, grandparents, members of the community, and district representatives provided information regarding staff development, access to the general education curriculum in the least restrictive environment, parental involvement, provision of written notice, and transition planning processes. A large turnout from the Hispanic community provided insight into concerns and issues regarding equal access and communication between parents and school.

The information obtained from this meeting was used, in addition to other sources of information, to highlight areas of concern for the on-site visit. Other sources of information included reviews of documentation, interviews with district personnel and parents, as well as a review of other relevant information as determined appropriate by the monitoring team.

The purpose of the on-site monitoring was to determine the district's compliance with the requirements of the Individuals with Disabilities Education Act (IDEA) 1997 and the New Jersey Administrative Code (N.J.A.C.) 6A:14. Areas of strength and areas of need are noted and identified in the following report of findings. Additionally, improvement plan directives are provided to assist the district in correcting all areas of need.

Noteworthy Programs and Practices

The district offers a wide range of assistive technology including auditory trainers, augmentative communication devices, and complete classroom sound amplification. In addition, the district provides software to support instruction in written expression and a program designed to support remediation of language disorders and speech delays.

Project AICES has received numerous statewide awards, including the NJ Disabilities Council Award for Exemplary Practices for both its summer program and school year program; the NJ Speech and Language Association Program of the Year award; and was selected a Star School by the NJDOE. This program serves as a model for inclusion of students with severe disabilities.

The district has invested a great deal of time and resources in staff development efforts. They have provided workshops on inclusion and in-class support, learning styles and multiple intelligences, behavior management and innovative teaching methodologies. This is an on-going effort expected to continue over the next few years.

The staff of the Vineland School District is proud of the many successful programs for special education students in their district. In particular, team teaching programs have been implemented at several schools; Project Impact for parents and students at the preschool level in an inclusive setting; the SUCCESS program that has greatly increased Vineland's ability to serve students with severe behavioral problems in district; and discrete trial and PECs at several schools for students with autism.

The district provides a wide range of clubs and activities designed to include students with disabilities. This includes the AICES Club, which fosters the integration of students with augmentative communication devices.

The district offers summer reading and enrichment programs designed to reinforce skills acquired during the school year and expand upon real life experiential learning opportunities in the community.

Areas of Compliance:

The district has demonstrated systemic compliance with the requirements established in Section V - Protection in Evaluation, Section XII - Assessment, and Section XIII - Graduation.

Section I: General Provisions

Summary of Findings:

Review of the district's policies and procedures indicated that annually the district submits required IDEA reports regarding the numbers of students with disabilities and a report of certified and contractual staff. The district makes information regarding the IDEA application available to parents and the general public as required.

The district is currently revising their policies and procedures to be in compliance with federal and state regulations, according to the directive from the Office of Special Education Programs.

The new administrative structure does provide more communication between staff and supervisors. Articulation between schools and programs and parents has improved, though continued progress in this area is warranted. The further development of the special education handbook that extends and clarifies the process that is to be used by staff to

implement the special education procedures is needed.

Problems were noted with policies and procedures and follow-up activities for staff development initiatives.

Area of Need:

Current Policies and Procedures - The district's has not yet submitted special education policies that are compliant with IDEA 1997 and N.J.A.C. 6A:14.

- The district is directed to complete the process of adopting the special education policies and developing the procedures to implement those policies as directed in the memo from the Office of Special Education Programs

Staff Development—The district has provided extensive training for staff on disabilities and inclusive programs, however, there is an identified need for follow-up activities and planning for additional training.

- The district is directed to review and revise their Comprehensive System of Personnel Development plan to include follow-up activities to evaluate effectiveness and to incorporate continuing areas of staff need.

Section II: Free, Appropriate Public Education

Summary of Findings:

The district makes available a free appropriate public education to students with disabilities between the ages of 3 to 21, including students with disabilities that have been suspended or expelled from school. All special education teachers and related service personnel are fully certified. The school day and academic year for the vast majority of students with disabilities is at least as long as that for non-disabled students. Many students with disabilities have available to them the variety of programs and services that are available to non-disabled students and are afforded the opportunity to participate in extracurricular activities.

Problems, however, were noted in the area of extended school year, the determination of access to the general education curriculum, procedures for transfer students, and provision of non-academic programs and related services for specific populations (hearing impaired, behavior disabilities, and Hispanic).

Areas of Need:

Extended School Year- The district does not ensure consistently that a free, appropriate public education is available to all students with disabilities between the ages of three and twenty-one with regard to the provision of extended school year programs. Although the

district offers various summer programs to students in the district, the IEPs reviewed did not consistently contain documentation that an extended school year was considered and discussed for all classified students. Teachers, child study team members, and parents report the consideration of the need for an extended school year was not always discussed at IEP meetings.

- The district is directed to develop an improvement plan that identifies the process it will follow to ensure the need for an extended school year program will be considered for every child and will be discussed at meetings. Should it be determined that an extended school year is required, the district must ensure that all required services are included in that program.

Access to the General Education Curriculum- While many students have access to the general education curriculum, students participating in special education classes as a whole participate in a separate special education curriculum. Documentation in student IEPs did not consistently reflect consideration on an individualized basis that included the need for accommodations and modifications to the regular education curriculum. There is a need for more staff development for child study teams and regular and special education teachers on modifying the core curriculum content standards for students with disabilities. To facilitate access to regular education programs, Vineland public schools offers some unique and highly advanced assistive technology however its deployment was inconsistent throughout grade levels and programs.

- The district is directed to develop an improvement plan that identifies the procedure it will follow to ensure that consideration and determination of participation in the general education curriculum is documented based on individual student need. This procedure must also include consideration and documentation of the need for both accommodations and adaptations within the context of the regular education curriculum for individual students, including the need for assistive technology, and a plan for consistent implementation of required accommodations based on those needs.
- The district is directed to develop an improvement plan that includes staff development for Child Study Team members, regular education and special education teachers on the CCCSs and its implementation. The plan should be developed to assist staff in making IEP placement decisions that are based on student needs and will promote access to the general curriculum. In addition, the plan must include a mechanism for increasing communication and collaboration between special education teachers, regular education teachers, and child study team members.

Providing programs specified in the IEP – The district did not consistently provide services to students as required by their IEPs. Guidance and counseling services were inconsistently provided across the district. Behavioral intervention plans were developed

for certain programs and missing from other programs. Certain identifiable groups, such as the hearing impaired and Hispanic population, had limited access to related services and services of a non-academic nature.

- The district is directed to develop an improvement plan that identifies the procedure it will follow to ensure that related, general, and non-academic services are delineated in the IEP based on the needs of the student. The plan will also address the procedures used by the district to ensure that there is a match between what is required by the IEP and the services that are actually provided to students with disabilities.
- The district is directed to develop an improvement plan with the input of parents, deaf community members, and professionals that specifically addresses the need for guidance and counseling services for hearing impaired students.
- The district is directed to develop an improvement plan that addresses the provision of related services to meet the needs of Hispanic children with disabilities.

Transfer Students – The district has revised registration procedures and improvements are noted with this process. However, the district does not consistently document that the records of students with disabilities are reviewed immediately upon transfer into the district. When an interim placement was required, notice was not consistently provided to the parent.

- The district is directed to develop an improvement plan that identifies the procedures it will follow to ensure an immediate review of records for transfer students. The plan must also include the provision of notice to the parent when proposing an interim placement.

Section III - Procedural Safeguards

Summary of Findings:

The district has appropriate procedures in place for the provision of surrogate parents, should the need arise. The district obtains parental consent, as required. The district follows proper procedures with regard to the provision of independent evaluations. The district, for the most part, provides PRISE, 6A: 14, and 1:6A as required and upon parental request.

Problems were noted with written notice, documentation of provision of notice within required timelines, notice of transfer of rights at the age of majority, and appropriate participants at meetings. Though problems were noted with respect to compliance with native language requirements, other issues arose regarding the amount and quality of communication between Hispanic parents and staff.

Areas of Need:

Meeting Participants – The district has not consistently conducted meetings with the appropriate participants. At times, regular education teachers were not in attendance. In other situations, special education teachers did not participate, and/or the full child study team was not present when required. Meetings were not consistently conducted in the language used for communication by the parent or adult student, or documented that appropriate measures were taken to obtain participation by parents.

- The district is directed to develop an improvement plan that identifies the procedures, training, and accountability measures to be used to ensure proper participation at meetings in accordance with 6A: 14 - 2.3 and 2.4.

Notice of a Meeting – Notices for identification meetings do not identify all the participants by discipline. Meeting notices for the reevaluation-planning meeting identify the participants as the "IEP team". When the district combines eligibility and IEP meetings, notice of a meeting does not consistently identify the purpose or document provision of PRISE.

- The district is directed to revise their notices of planning meetings to identify participants by discipline.
- The district is directed to develop an improvement plan that identifies the procedures it will use to ensure that proper notice of meeting and provision of PRISE are provided whenever combined eligibility and IEP meetings are held.

Written Notice – The district does not consistently document that written notice is provided within the required 15-day timeline. In addition, the district does not consistently document that parents receive the statement of determination of eligibility. Evaluation plans for speech-language do not contain a description of the nature and scope of the evaluation or consideration of information made available by the teacher and/or parent.

- The district is directed to develop an improvement plan that identifies the procedure it will follow to ensure that written notice is provided within required timelines and documented in pupil records.
- The district is directed to develop an improvement plan that identifies the procedure it will follow to ensure that written notice of a proposed speech-language evaluation contains a description of the nature and scope of the

evaluation. The document must also include consideration of information made available by the teacher and or parent, as appropriate.

- The district is directed to develop an improvement plan that identifies the procedures it will follow to ensure all notices are in native language when appropriate.

Documentation of Written Notice – The district does not consistently maintain copies of notices in student files. Interviews with child study team members indicate that these notices are provided, but documentation was not consistently found in pupil records.

- The district is directed to develop an improvement plan that identifies the procedure it will follow to ensure documentation of all notices are maintained in the student files.

Transfer of Rights at Age of Majority – The district does not consistently document that parents and students are informed that all rights will transfer to the student on reaching the age of majority.

- The district is directed to develop an improvement plan that identifies the procedure it will follow to ensure that students and parents are informed, in writing, of the transfer of rights at least three years before the student's 18th birthday and that documentation is maintained in pupil records on a consistent basis.

Section IV- Location, Referral and Identification

Summary of Findings:

The district utilizes Child Find location efforts via mailings to various agencies and medical facilities concerned with the education of children ages 3-21. Interventions in general education programs as well as the implementation of these interventions are documented in student files.

However, issues were identified regarding the identification and referral process, the notice of the identification meeting, documentation of discussion at meetings, as well as mis-utilization of district forms.

Areas of Need:

Referral Process – Interviews and review of records indicate that there was a lack of knowledge of a school and district-wide referral policy. Procedures for referral varied among schools and documentation was not appropriately completed to reflect the process. The completion of the referral process did not consistently meet appropriate guidelines. Often, the district's process for registering children identified as disabled or potentially

disabled became a barrier to timely implementation of services

- The district is directed to develop an improvement plan that identifies appropriate written procedures for referral that meet the timelines as outlined in code. This plan must include a mechanism for informing staff and parent of these procedures and implementing these procedures consistently throughout the district.

Identification Meetings - A review of student records and interviews indicated that the procedure and documentation of the identification meeting is inconsistently executed. Identification meetings are not consistently conducted within the timelines as outlined in code. Notice of the identification meeting does not contain a list of the participants by job title. (Notice of the identification meeting is addressed in Section III—Procedural Safeguards.) At the identification meeting a review of the data is not consistently documented and the nature and the scope of evaluations are not determined individually. Hearing and vision screenings are not consistently completed as part of the referral process. There is a lack of documentation indicating that parents receive notice 15 days after the identification meeting or that the district consistently provides a copy of N. J. A. C. 1:6A. (Corrective action for provision of notice within 15 days is addressed in Section III—Procedural Safeguards). In addition, a review of student records indicates that while the district has implemented a new format for evaluation plans, completion of all required components is addressed differently by different team members.

- The district is directed to develop an improvement plan that identifies the procedures it will follow to ensure that identification meetings are held within 20 days from receipt of written referral. This plan must include a mechanism for oversight of timelines.
- The district is directed to develop an improvement plan that ensures that identification meetings include a review of data and that this review is documented in written notice. This plan must include a mechanism for providing training to child study team members, including speech-language specialists, to ensure consistency.
- The district is directed to develop an improvement plan that identifies the procedures it will follow to ensure that the nature and scope of evaluations are determined individually based on student need.
- The district is directed to develop an improvement plan that identifies the procedures it will follow to ensure that hearing and vision screenings are consistently conducted for students referred for evaluation.
- The district is directed to develop an improvement plan that identifies the procedures it will follow to ensure that notice of the nature and scope of the evaluation includes provision of N.J.A.C. 1:6A. This plan must include procedures to ensure that documentation is maintained in student files and

provide for additional staff in-service to assure that all child study team personnel consistently and sufficiently document written notice.

Standard V – Evaluation

Summary of Findings:

The district implements evaluation procedures that are technically sound, are neither culturally or racially discriminatory, and are administrated by trained personnel. The district conducts evaluations using a multi-disciplinary team. At least one evaluator is knowledgeable in the area of the suspected disability. In addition, written reports were signed and dated by the evaluators.

Problems were noted with evaluation timelines and the process for revising evaluation plans.

Areas of Need:

Timelines—The district did not consistently complete the evaluation process within 90 days.

- The district is directed to develop an improvement plan that identifies the procedures it will follow to ensure that initial evaluations are completed within 90 days of parental consent. The plan must also include a mechanism for oversight and supervision.

Revisions to Evaluation Plans—The district does not consistently document that written notice is provided to the parent when proposing revisions to evaluation plans.

- The district is directed to develop an improvement plan that identifies the procedures it will follow to ensure that when the district proposes a revision to the evaluation plan, that written notice is provided to the parent.

Standard VI- Reevaluation

Summary of Findings:

The district has revised most of the forms associated with reevaluations and staff development has been provided regarding the use of these forms.

However, problems were noted with timelines, documentation of the review of data and determination of the nature and scope of the evaluations, consent, preschool reevaluations, reevaluation when considering a change in eligibility, responding to teacher and parental requests for reevaluations sooner than three years, documenting

review/revision to the IEP, and notice of a meeting. (Corrective action for notice of a meeting is addressed in Section III—Procedural Safeguards.)

Areas of Need:

Timelines – The district does not consistently complete reevaluations within the three-year timeline. In addition, when parents or staff request a reevaluation sooner than three years, the district does not consistently conduct these evaluations without undue delay.

- The district is directed to develop an improvement plan that identifies the procedures it will follow to ensure that reevaluations are conducted within three years of the last date of eligibility, or sooner, when requested by teachers and/or parents. The plan must include a mechanism for ensuring that evaluations proceed without undue delay.

Reevaluation Planning Meetings – The district did not consistently document that reevaluation-planning meetings included a review of data and the determination of the nature and scope of the evaluation.

- The district is directed to develop an improvement plan that identifies the procedures it will follow to ensure that reevaluation-planning meetings include a review of data and the determination of the nature and scope of the evaluation.

Preschool –The district does not consistently conduct reevaluations by June 30th of the preschooler's last year in a preschool program.

- The district is directed to develop an improvement plan that identifies the procedures it will follow to ensure that by June 30th of a preschooler's last year in a preschool program, a reevaluation is conducted.

Change in Eligibility –The district does not consistently conduct a reevaluation when considering a change in eligibility.

- The district is directed to develop an improvement plan that identifies the procedures it will follow to ensure that reevaluations are conducted when considering a change in eligibility.

Review/Revision of the IEP - The district did not consistently document that student IEPs were reviewed and revised, if necessary, as part of the reevaluation process.

- The district is directed to develop an improvement plan that identifies the procedures it will follow to ensure that, in the event that additional assessments are not required, documentation is maintained that the IEP is reviewed and/or revised, as necessary.

Section VII- Eligibility

Summary of Findings:

Eligibility meetings were conducted following the evaluation process. The district employs appropriate specialists who use the correct diagnostic instruments to determine eligibility. Eligibility is based on the required assessments.

Problems were noted with notice of a meeting when the purpose of the meeting included development of an IEP including provision of PRISE, participants at eligibility meetings, provision of written notice, and the provision of evaluation reports to parents.

Areas of Need:

Notice of meeting and Provision of PRISE – When the district combines eligibility meetings and IEP meetings; parents are not consistently given appropriate notice of such purposes or PRISE. (Corrective action for this issue is addressed in Section III—Procedural Safeguards.)

Written Notice - The district does not consistently document that written notice of the statement of determination of eligibility is provided to the parent within 15 days of the eligibility meeting. (Corrective action for provision of written notice is addressed in Section III—Procedural Safeguards.)

Participants – Required staff members did not consistently attend eligibility meetings. Staff reported that when they did attend eligibility meetings they were not present for all decision-making components of the meeting. (Corrective action for meeting participants is addressed in Section III—Procedural Safeguards.)

Provision of Evaluation Reports – Documentation was not maintained to demonstrate that evaluation reports were given to parents at the time of provision of the statement of determination of eligibility. Parent and staff interviews indicated that these reports were not consistently provided to parents.

- The district is directed to develop an improvement plan that identifies the procedures it will follow to ensure that parents are provided with assessment reports at the time of eligibility and that this activity is documented.

Section VIII- Individualized Education Program

Summary of Findings:

Through record reviews and staff interviews it was determined that the district ensures that

IEPs are implemented and in effect as required. Through staff interviews it was also noted that staff members have access to IEPs for all educationally disabled students in their class.

However, problems were noted with IEP components, IEP meeting participants, identifying relationships between the present levels of educational performance (PLEP) and LRE statements, as well as the relationships between IEP goals and objectives and the core curriculum content standards (CCCSs).

Areas of Need:

IEP Components- The IEPs reviewed did not consistently contain appropriate considerations with the required statements as stated in N.J.A.C. 6A:14. Through staff interviews and review of additional materials provided to the monitoring team, it was noted that the district is planning to adopt a new IEP format as well as a computerized data and IEP system. -In addition to these changes, there are identified concerns with staff adherence to existing procedures, forms and processes and the need for staff development in this area.

- The district is directed to develop an improvement plan that identifies the procedures it will follow to ensure that training is provided to district child study team and instructional personnel on the implementation of the proposed IEP format. This improvement plan must include a mechanism for reviewing the document to assure that all IEP components are addressed, for monitoring the utilization of revised forms and procedures, and for evaluating the effectiveness of documenting student's programs.

Meeting participants- The district board of education does not ensure that regular education teachers are consistently present at IEP meetings. In many cases the teacher selected to attend the IEP meeting was not a teacher having direct knowledge of the student's individualized needs. (Corrective action for meeting participants is addressed in Section III—Procedural Safeguards.) In addition, the district does not maintain documentation of multiple attempts to secure parent participation in IEP meetings. Many files did not document more than one attempt.

- The district is directed to develop an improvement that identifies the procedure it will follow to ensure that multiple attempts are made to secure parental participation in IEP meetings and that these attempts are documented in pupil records.

Relationships between PLEP and LRE statements- The IEPs reviewed contained detailed statements regarding students' present levels of educational performance (PLEP). Teacher interviews indicated that these descriptions contained sufficient information to identify specific areas of need and to provide appropriate instruction. However, there was not a clear relationship between these statements and the rationale for placement in the

least restrictive environment.

- The district is directed to develop an improvement plan that identifies the procedures it will follow to ensure that IEPs document the decision-making process for placement in the least restrictive environment and how the current level of performance led to that decision.

Relationships between IEP and CCCSs- The IEPs did not contain a statement of measurable annual goals that are related to the core curriculum content standards through the general education curriculum.

- The district is directed to develop a plan that ensures that the goals and objectives identified in the IEP are related to the CCCSs.

Section IX- Least Restrictive Environment

Summary of Findings:

Students are placed in a variety of education programs including supported regular education, in-class and pull-out resource programs, special classes and out-of-district placements.

However, problems were noted in the areas of documenting the LRE process, LRE for preschool disabled students, and annual review timelines.

Areas of Need:

LRE Documentation - The IEPs reviewed did not consistently document the individualized decision making process for placement or that removal of students with disabilities only occurs when the nature or severity of the disability is such that education in the regular education class with the use of supplementary aids and services cannot be achieved satisfactorily. This includes placements for preschool students. In addition, IEPs did not indicate that there was consideration of a full continuum of placements for disabled students. For example, in-class support was only available to students on a full time basis. Student placement decisions were limited to programs that currently exist in the district rather than those based on individual student needs.

- The district currently has a corrective action plan to address these issues. This plan must be fully implemented and incorporated into that action plan.

Annual Reviews – The district does not consistently review IEPs on an annual basis.

- The district is directed to develop an improvement plan that identifies the procedure the district will follow to ensure that IEPs are reviewed at least annually. This plan must include a mechanism for oversight and supervision.

Section X- Transition

School to Post-School

Summary of Findings:

The district fails to fully ensure that IEPs document statements of transition service needs for students with disabilities at age 14 or younger, if appropriate, and statements of needed transition services for students with disabilities beginning at age 16, or younger, if appropriate. More importantly, the district's provision of transition services is inconsistent and not based on the needs of the student. Liaisons with community providers and other state agencies are not provided on a consistent basis. Additional problems were noted with the documentation of transition services in the IEP, participants at transition meetings, and documentation of student interests and preferences and agency representation and participation.

Areas of Need:

IEP Documentation - Although the district is providing some work experiences to students in their district, the documentation of these services is limited and does not meet all of the regulatory requirements. The documentation of transition programming is not in the district's current IEP format. Since efforts that the district may be making occur outside the IEP process, appropriate documentation necessary for implementing the transition process is lacking. In addition, there was a lack of documentation of consideration of student interests and preferences and how that information was obtained.

- The district is directed to develop an improvement plan that identifies the procedure the district will follow to ensure the development of appropriate transition plans that include all required components. The plan must include a mechanism to ensure documentation of the planning process as well as the plan itself. Further, the plan must identify evaluative tools that can be used to assist students in the career planning process and identify staff and a timeline for their use.

Transition Meeting Participants – In reviewing student records, the monitoring team was unable to consistently document the invitation of agency representatives to IEP meetings when transition planning is conducted. In addition, records did not document the extent of the agency participation at IEP meetings.

- The district will develop an improvement plan that identifies the procedure it will follow to ensure invitation and documentation of agency participants at transition planning meetings.

Provision of Transition Services – Interviews revealed that transition IEPs are developed with an awareness of service limitations and staff resources and not on the needs of the students.

- The district will develop an improvement plan that identifies the procedures it will follow to ensure that transition planning and programs are based on the needs of students, not availability of district resources and staff.

Preschool Transition

Summary of Findings:

The district facilitates transition from early intervention to preschool by arranging for a child study team member to attend the preschool transition planning conferences. Preschoolers with disabilities have their IEPs implemented no later than age three. The IMPACT program is a model that has effectively met the needs of preschool children with disabilities.

Section XI - Discipline

Summary of Findings:

The district does not consistently implement appropriate disciplinary measures when those actions are required. Manifestation determinations are not always held, as required, with appropriate participants. Principals and assistant principals have not yet fully assimilated federal and state guidelines on discipline. Some problems were noted with the consistent development of behavior intervention plans (BIP) for students with a known history of behavior concerns.

Area of Need:

Manifestation Determinations – A review of student files indicated that manifestation determinations are not held on a consistent basis, when required, with the correct participants.

- The district is directed to develop an improvement plan that identifies the procedures it will follow to ensure that manifestation determination meetings are held as required and that the required participants are in attendance.

Behavior Intervention Plans – A review of the files did not show evidence of behavior management plans being developed on a consistent basis for students as a result of concerns arising from IEP meetings. Students attending the SUCCESS program have very detailed and well developed BIPs and interviews indicated that staff, students and parents are pleased with the success this program is attaining in the short time it has been in existence. However, BIPs are not consistently developed for other students in the district

with a known history of behavior concerns.

- The district is directed to develop an improvement plan that identifies the procedures it will follow to ensure the development of appropriate behavior intervention plans for all students who require them. This plan must also include a mechanism for in-servicing staff and administration on discipline requirements.

Section XV – Student Records

Summary of Findings:

The district responds to parental requests to review records. Student records included access sheets.

Problems were noted with utilization of revised forms by staff, despite training and administrative oversight. Individuals continue to use "old forms" even though the district has developed and disseminated revised documents and the documentation of location of other files in the district.

Maintenance of Records – Student records lacked organization. All records for a student were not maintained in one file, or labeled indicating that other files existed and where they were located. Several versions of each form used in the special education process were available to staff as well as versions that were out-of-date and/or incorrect.

- The district is directed to consistently organize files so that they are clearly labeled regarding the existence of other files for a student and where they can be found.
- The district is directed to ensure that one compliant version of each form is used by staff.