

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

**District:** Willingboro Township School District      **County:** Burlington

**Monitoring Dates:** February 4, 5, 6 and 7, 2002

**Monitoring Team:** Patricia Fair, Jane Marano, Caryl Carthew, Arlene Popovici and Debbie Knauss

### **Background Information:**

During the 2000-2001 school year, the Willingboro Township 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 Willingboro Township 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 noncompliant with state and federal requirements. The Willingboro Township School District developed an improvement plan to address the identified areas of need.

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

As the first step in the on-site monitoring process, the New Jersey Department of Education (NJDOE) held a focus group meeting for parents and community members at the Levitt Administration Building, on January 30, 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 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 administrators, building principals, general education and special education teachers, and child study team members and parents.

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### **Section I: General Provision**

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

During self-assessment the district accurately identified themselves compliant in the areas of policies and procedures and the dissemination of IDEA information.

During the self-assessment process, the district identified concerns in the area of professional development for both special education and general education teacher. The district failed to submit an improvement plan for this area of need. The plan needs to be revised to include procedures and the mechanism the district will employ to determine the effectiveness of the in-service.

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 area of certifications.

During the self-assessment process, the district-identified concerns in the areas of the provision of related services, length of school day/year, monitoring of implementation of IEPs and transfer students. The district's improvement plan is sufficient to address related services, length of school day/year and transfer students. The district's improvement plan is insufficient to address monitoring of implementation of IEP because it lacks an administrative oversight component to ensure full implementation of the new procedures. The plan needs to be revised to include this component.

Additional areas of need were identified during on-site monitoring regarding extended school year and facilities. The county office has been notified of the facility issue at Willingboro High School.

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

**Extended School Year** – During the on-site visit, a review of records and interviews with staff indicated that extended school year is not consistently discussed and considered at IEP meetings of all students.

- **The district will revise its improvement plan to include procedures to ensure extended school year is discussed and considered at IEP meetings for all students. The plan must include an administrative oversight component to ensure implementation of the procedures.**

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### **Section III: Procedural Safeguards**

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

During self-assessment the district accurately identified themselves compliant in the areas of consent and native language.

During the self-assessment process, the district identified concerns in the areas of surrogate parents, independent evaluations and securing parent participation at meetings. The district's improvement plan is sufficient to address independent evaluations and securing parent participation at meetings. The district did not submit a plan for surrogate parents. The plan needs to be revised to include procedures to bring about the required changes.

Additional areas of need were identified during the on-site visit regarding notice of meetings, written notice and consent to implement the IEP sooner than 15 days.

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

**Notice of a Meeting** – During the on-site visit, record review indicated that notice of a meeting does not have a statement informing parents that they can reschedule or participate in meetings via electronic conference equipment nor does it indicate that the purpose of the meeting is to determine eligibility. Parents reported that as a result, they have not had sufficient knowledge regarding the purpose of the meeting nor have they been given the opportunity to reschedule the meeting. Additionally, parents reported they often receive notice of a meeting after the meeting has occurred.

- **The district will revise its improvement plan to include procedures to revise its notice of a meeting to include all required statements. The plan must also include procedures to ensure parents are provided with notice of a meeting early enough to ensure their participation. The plan must further include an administrative oversight component to ensure implementation of the procedures. It is recommended that the district adopt the notice forms developed by the Office of Special Education Programs.**

**Written Notice** – During the on-site visit, record review determined that written notice does not include a description of any options the districts considered and the reason why these options were rejected or a description of any factors that are relevant to the proposal or refusal by the district. It was further indicated that written notice is not consistently provided within 15 days. Additionally, it was determined the district does not allow parents 15 days to consider the proposed actions identified in the notice.

- **The district will revise its improvement plan to include procedures to ensure written notice is revised to include all required components and is provided within 15 days of a meeting. The plan must also include procedures to ensure parents are afforded 15 days to consider a proposed action unless they agree in writing to an immediate implementation of the proposed action. The plan must include an administrative oversight component to ensure implementation of the procedures.**

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

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

During self-assessment the district accurately identified themselves compliant in the area of summer referrals.

During the self-assessment process, the district-identified concerns with child find, the referral process, health summaries, vision and hearing screenings and identification meetings. The district's improvement plan is sufficient to address health summaries and vision and hearing screenings. The improvement plan is insufficient to address child find and the referral process because it lacks an administrative oversight component to ensure implementation of the procedures. The plan needs to be revised to include this component. Additionally, the district has participated in technical assistance sessions regarding the issue of an overrepresentation of minority students in special education. Staff from the Office of Civil Rights and the Office of Special Education Programs will determine the appropriateness of that plan and advise the district of any additional requirements.

An additional area of need was identified during the on-site visit regarding direct referrals.

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

**Direct Referrals** – During the on-site visit, a review of records and staff interviews indicated all referrals had to go through the Pupil Assistance Committee (PAC) process first, eliminating the possibility of a direct referral by parents or staff members.

- **The district will revise its improvement plan to include procedures to ensure parents and staff have the ability to directly refer a student to the child study team and to participate in meetings when they believe the nature of the student's problem is such that an evaluation is warranted without delay. At that meeting, a decision may be made that an evaluation is not warranted and that the student needs to be referred to the PAC. The improvement plan must include a mechanism to establish criteria that identifies the type of documentation that would support a staff request for a direct referral. The plan must further include in-service and an administrative oversight component to ensure full, consistent implementation of these activities.**

### **Section V: Protection in Evaluation and Evaluation Procedures**

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

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

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During the self-assessment process, the district identified concerns with functional assessments, written reports and accepting and rejecting reports. The district's improvement plan is sufficient to address these areas of need.

An additional area of need was identified during the on-site visit regarding multi-disciplinary evaluations.

### **Area of Need:**

**Multidisciplinary Evaluations** – During the on-site visit, it was determined through record review that proposed assessments for which the district obtained consent are not consistently conducted. Instead, these assessments are either not completed or different assessments are conducted in place of the assessments agreed to by the parent.

- **The district will revise its improvement plan to include procedures to ensure agreed upon assessments are conducted. In the event the team determines additional or different assessments are required, written notice must be provided to the parent that reflects the proposed changes/additions to the evaluation. The plan must include in-service and an administrative oversight component to ensure consistent, compliant implementation of the procedures.**

### ***Section VI: Reevaluation***

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

During self-assessment the district accurately identified themselves compliant in the areas of planning meetings and turning age 5.

During the self-assessment process, the district identified concerns with reevaluation timelines. The district's improvement plan is sufficient to address this area of need.

An additional area of need was identified during the on-site visit regarding participants at planning meetings.

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

**Participants at Planning Meetings** – During on-site, a review of records and staff interviews indicated that, though general education teachers are signing participation in meetings, they are not attending.

- **The district will revise its improvement plan to include procedures to ensure a general education teacher attends meetings in which his or her participation is required. The plan must include an administrative oversight component to ensure implementation of these procedures.**

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### **Section VII: Eligibility**

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

During self-assessment the district accurately identified themselves compliant in the area of eligibility meetings.

During the self-assessment process, the district identified concerns regarding the provision of required specialist evaluations to determine eligibility and regarding documentation that eligibility is not due to a lack of instruction in reading or mathematics. The district's improvement plan is sufficient to address these issues. The district further identified concerns regarding the provision of evaluation reports to parents. The district's improvement plan is not sufficient to address this issue because activities do not ensure provision of reports 10 days prior to the eligibility conference and lacks an administrative oversight component to bring about the required changes. The plan needs to be revised to include these elements.

Additional areas of need were identified during the on-site visit regarding meeting participants (addressed in *Section VI*) and documentation of eligibility.

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

**Documentation of Eligibility** – During the on-site monitoring, a review of records indicated the district does not consistently provide a statement of the determination of eligibility to parents.

- **The district will revise its improvement plan to include procedures to ensure that statements of eligibility determinations are provided to parents or adult-students, within 15 days of the eligibility meeting. The plan must include a mechanism to document this provision in the file. The plan must further include an administrative oversight component to ensure implementation of the procedures.**

### **Section VIII: Individualized Education Program (IEP)**

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

During self-assessment the district accurately identified themselves compliant in the areas of implementation dates, annual review timelines, and 90-day evaluation timelines.

During the self-assessment process, the district identified concerns regarding teacher knowledge of IEP accommodations and modifications. The district's improvement plan is not sufficient to address this issue because it lacks an administrative oversight component to ensure implementation of the procedures. The plan needs to be revised to include this component.

Additional areas of need were identified during the on-site visit regarding notice of a meeting (addressed in *Section III*), meeting participants (addressed in *Section V*), IEP components, IEP goals and objectives, age of majority, and development of an IEP prior to the provision of services.

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### Areas of Need:

**IEP Components** – During the on-site monitoring, a review of the IEP format for students classified eligible for special education and related services indicates that the following components are not addressed: the strengths of the student; parental concerns; and, the results of the most recent evaluation.

- **The district will revise its improvement plan to include procedures to ensure the IEP includes all required components. The plan must include an administrative oversight component to ensure these components are included in the format and completed in an appropriate manner by team members.**

**Goals and Objectives** – During the on-site monitoring, a review of IEPs and interviews with district personnel indicated that IEPs do not contain academic goals and objectives. Only at the preschool level do IEPs include goals for related services and developmental goals for students. For school-aged students, goals and objectives are not included for those areas in which students receive special education instruction. Instead, IEPs include a statement that students in resource center classes and self-contained classes follow the core curriculum content standards (CCCS), even though those standards are adapted and/or modified.

- **The district will revise its improvement plan to include procedures to ensure IEPs include goals and objectives in those areas for which students receive special education. In the event the CCCS are adapted and/or modified, goals and objectives must identify what those adaptations/modifications are. The plan must include in-service and an administrative oversight component to ensure consistent, compliant implementation of the procedures.**

**Age of Majority** – During the on-site monitoring, a review of the IEP document indicates that the notice of the transfer of rights at the age of majority occurs one year prior to the student turning 18, instead of the required three years.

- **The district will revise its improvement plan to include procedures to ensure that notice of the transfer of rights occurs at least three years prior to the student attaining age 18.**

**Placement of Identified Students** – During the on-site monitoring, a review of handbook materials and policies and procedures indicates that the district currently operates the Levitt Educational Alternative Program (L.E.A.P.), a special education alternative service. The brochure indicates this program is for classified students, only. A review of student records and interviews with staff members indicate that students who are in the initial evaluation process are sometimes placed in this program prior to the determination of eligibility and the development of an IEP.

- **The district will revise its improvement plan to include procedures to ensure students who have not yet been determined eligible for special education are not placed in special education programs prior to the determination of eligibility and development of an IEP. The plan must**

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**include an administrative oversight component to ensure implementation of the procedures.**

**Section IX: Least Restrictive Environment (LRE)**

**Summary of Findings:**

During the self-assessment process, the district identified concerns with supplemental aids and services, general education access and nonacademic and extracurricular participation. The improvement plan is insufficient to address these areas because it lacks an administrative oversight component to ensure consistent implementation of procedures. The plan needs to be revised to include this component.

Additional areas of need were identified during the on-site monitoring regarding education/instructional materials, individual decision-making, general education access and the continuum of options.

**Areas of Need:**

**Educational/Instructional Materials** – During the on-site visit, classroom observations and interviews with staff indicated that special education students do not have adequate educational/instructional materials such as textbooks and workbooks. During the interview process, principals stated that they are only responsible for ordering instructional supplies and materials for general education classrooms. Special education teachers must go to pupil personnel services to get their text, materials and supplies. Principals further stated that there is frequently either an insufficient supply of materials to meet the needs of the special education class or materials and supplies can not be located. During the focus group meeting, every parent who spoke indicated their children had no books. Staff stated that though they were routinely directed to go to a specific location where texts, materials and supplies slated for special education students were stored, at no time were these texts, materials and supplies ever located. Though the special education administrator indicated she believed this information was inaccurate, she did state that she had not been in the classrooms to assess the situation.

- **The district will revise the improvement plan to include procedures to ensure the district provides its special education instructional staff with sufficient materials to afford students with disabilities the opportunity to access and progress in the general education curriculum. The plan must include a needs assessment and an administrative oversight component to ensure the implementation of the procedures.**

**Individual Decision Making** – During the on-site visit, interviews with staff indicated decisions regarding programs are based on existing program options in the district and not on the individual needs of students.

- **The district will revise its improvement plan to include procedures to ensure that placement decisions are based upon individual student needs and not on the availability of program options. The plan must include in-**



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**service and an administrative oversight component to ensure the consistent, compliant implementation of the procedures. It is recommended these procedures be linked to the development/expansion of a continuum of program options.**

**Continuum of Services** – During on-site, it was determined through staff interviews and classroom observations that the district does not provide a full continuum of programs and services. Staff indicated that classes of special education students can move from school-to-school each year for a variety of reasons. As a result, programs that they may have been receiving in the previous school are not available at the new school. Instead of addressing the staffing needs, students are simply placed into whatever program is available at that particular school. Additionally, when students are classified, because of the limited availability of program options and staff, there is little to no opportunity for these students to interact in academic or nonacademic activities with their nondisabled peers.

- **The district will revise its improvement plan to include procedures to ensure that the district offers and provides a full continuum of programs and services for students with disabilities. The improvement plan must include a mechanism to ensure a more stable environment for the classified students and that any movement out of specific buildings is done in an equitable manner that includes nondisabled students as well as disabled students. The plan must further include an administrative oversight component to ensure implementation of these procedures.**

**General Education Access** – During the on-site visit, record review and staff interviews indicated the district has created a self-contained school (Stuart School) that eliminates any possibility of access to nondisabled peers by the classified students who are placed there.

- **The district will revise its improvement plan to include procedures to ensure students with disabilities have access to their nondisabled peers and to academic and nonacademic/extra curriculum activities to the extent determined appropriate by the IEP team. In particular, the plan must include a mechanism to address the needs of the students who attend the Stuart School.**

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

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

During self-assessment the district accurately identified themselves compliant in the areas of student invitation, identification of post-secondary liaison, and access to established career-guidance activities.

During the self-assessment process, the district identified concerns in the areas of agency invitations and involvement in transition planning, development of goals and objectives related to student outcomes, developing partnerships with community resources, and monitoring of implementation of transition plans. The district's

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improvement plan is insufficient to address these issues because it lacks procedures to identify and develop appropriate transition programs/opportunities and an administrative oversight component to bring about the required changes. The plan needs to be revised to include these elements.

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

### **Section X: Transition – Transition to Preschool**

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

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

During the self-assessment process, the district identified concerns regarding implementation of programs by age three. The district's improvement plan is sufficient to address this issue.

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

### **Section XI: Discipline**

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

During self-assessment the district accurately identified themselves compliant in the areas of procedures and suspension tracking.

During the self-assessment process, the district-identified areas of need regarding documentation to case manager, behavior intervention plans/functional behavior assessments, manifestation determinations, and interim alternative educational settings. The district's improvement plan is insufficient to address these areas of need because it lacks an administrative oversight component to ensure implementation of the procedures. The plan needs to be revised to include this component.

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 participation and approved accommodations/modifications.

During the self-assessment process, the district identified an area of need regarding the Special Review Assessment (SRA). The district's improvement plan is sufficient to address this area of need.

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

**Section XIII: Graduation**

**Summary of Findings:**

During self-assessment the district accurately identified themselves compliant in the areas of IEP requirements, diploma, and participation in graduation exercises.

An area of need was identified during the on-site visit regarding written notice of graduation.

**Area of Need:**

**Written Notice of Graduation** – During the on-site visit, a review of student records indicated the inconsistent provision of written notice of graduation.

- **The district will revise its improvement plan to include procedures to ensure that written notice of graduation is provided to parents prior to graduation exercises and that documentation of this provision is maintained in the record. The plan must include an administrative oversight component to ensure implementation of the procedures.**

**Section XIV: Programs and Services**

**Summary of Findings:**

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

An area of need was identified during on-site monitoring regarding class-size.

**Area of Need:**

**Class-Size** – During the on-site visit, a review of records and classroom observations indicated that instructional size for resource rooms exceed that which is allowed by code.

- **The district will revise its improvement plan to include procedures to ensure resource center sizes comply with those allowed by code. The plan must include an administrative oversight component to ensure implementation of the procedures.**

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**Section XV: Student Records**

**Summary of Findings:**

During self-assessment the district accurately assessed themselves compliant in the areas of parent/adult-student access to records, access sheets, maintenance, destruction, and documentation of location.

During the self-assessment process, the district identified concerns regarding staff knowledge and amending records. The district's improvement plan is sufficient to address these areas of need.

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## **Summary**

An on-site special education monitoring was conducted in the Willingboro Township School District, on February 4, 5, 6 and 7, 2002. The purpose of the monitoring was to verify the district's report of findings resulting from self-assessment and to review the district's improvement plan. As a result of this review during the self-assessment process, the district was able to identify areas of need and develop an improvement plan that, with some revision, may be sufficient to bring about systemic change.

At a focus group meeting held prior to the monitoring visit, parents expressed concerns regarding the provision of related services, teacher knowledge of IEPs, the availability of appropriate instructional and educational materials, placement of students in appropriate programs, transition planning for students, knowledge of meetings and access to child study team personnel.

Areas identified as consistently compliant by the district during self-assessment and verified during the on-site monitoring visit included policies and procedures, the dissemination of IDEA information, certification, consent and native language, summer referrals, standardized assessments, bilingual evaluations, reevaluations by age 5, annual review timelines, 90-day evaluation timelines, preschool transition planning conferences, discipline procedures, participation in statewide assessments, participation in graduation, graduation requirements, and diploma issuance.

During the self-assessment process, the district identified areas of need regarding professional development, provision of related services, length of school day/year, monitoring of implementation of IEP, transfer students, surrogate parents, independent evaluations, parent participation, Child Find, referral process, health summary, vision and hearing screenings, identification meetings, functional assessments, written reports, accepting and rejection of reports, teacher knowledge of IEP, supplemental aids and services, general education access, nonacademic and extracurricular participation, agency invitation and involvement in transition planning, development of goals and objectives, implementation of programs and age three, behavior intervention plans/functional assessments, manifestation determination and interim alternative educational settings.

The on-site visit further identified areas of need within the various standards regarding extended school year, notice of meeting, written notice, direct referrals, multidisciplinary evaluations, participants at planning meetings, documentation of eligibility, IEP, class-size, educational/instructional materials, individual decision-making, general education access, continuum, and written notice of graduation.

Within forty-five days (45) days of receipt of this monitoring report, the district will revise and submit 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.