



State of New Jersey
DEPARTMENT OF EDUCATION
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Governor

KIM GUADAGNO
Lt. Governor

ROCHELLE R. HENDRICKS
Acting Commissioner

December 1, 2010

Dr. Margaret Peretti, Superintendent
Harrison Township School District
120 North Main Street
Mullica Hill, NJ 08062

Dear Dr. Peretti:

Subject: Special Education Monitoring Report – Harrison Township School District

This correspondence has been sent to inform you of the results of the New Jersey Department of Education, Office of Special Education Programs' onsite monitoring regarding the Harrison Township School District's implementation of federal and state special education requirements. Between February 16 and November 15, 2010, the New Jersey Department of Education, Office of Special Education Programs (NJOSPEP), conducted onsite monitoring visits, verification visits and desk audits in Harrison Township School District to determine compliance with federal and state special education requirements. The members of the monitoring team were Kenneth Richards and Patricia Farr.

The special education monitoring system is data driven and aligned with the federally required State Performance Plan (SPP) indicators, including the federal monitoring priorities established by the Individuals with Disabilities Education Act of 2004 (IDEA 2004). Specifically, the NJOSPEP monitoring process is focused on improving educational results and functional outcomes for students with disabilities and ensuring compliance with those special education requirements related to positive student outcomes.

The special education self-assessment and monitoring process focused on requirements related to the following areas:

- **Transition to Adult Life**
- **State Assessment**
- **Placement in the Least Restrictive Environment**
- **Parent Involvement**
- **Disproportionate Representation of Specific Racial-Ethnic Groups in Special Education**
- **Evaluation and Reevaluation**
- **Individualized Education Program**
- **Programs and Services**

The Harrison Township School District was selected for the self-assessment/monitoring process through random selection.

Monitoring Results

The enclosed Table of Findings details the monitoring findings identified during onsite monitoring visits. Noncompliance was not identified by the district as part of the self-assessment process. **Findings resulting from the onsite monitoring must be corrected within one year of the date of this report. Corrective action should include, as necessary: development and/or revision of policies and procedures, staff training, implementation of the identified IDEA and N.J.A.C. requirements and implementation of an oversight mechanism to ensure ongoing compliance. The monitoring team leader, Mr. Kenneth Richards, will contact Ms. Joan Ruperton to discuss procedures for verification of correction of the findings of noncompliance listed in the Table of Findings. For any finding of noncompliance related to the development or implementation of IEPs or the delivery of programs and services, corrective action activities have been directed by NJOSEP.**

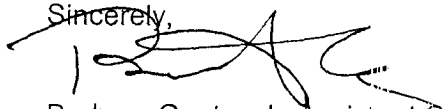
The results of the special education monitoring must be reviewed at the next meeting of the district's board of education. A copy of the minutes from the board of education meeting documenting the review by the board must be submitted to the following address:

Kenneth Richards
New Jersey Department of Education
Office of Special Education Programs – Southern Monitoring Office
Finlaw Building – 4th Floor
199 East Broadway
Salem, NJ 08079

Questions regarding the enclosed monitoring report should be directed to Dr. Peggy McDonald, manager of the Bureau of Program Accountability, at 609-292-7605.

The NJOSEP appreciates the cooperation of district staff members during the self-assessment/monitoring process.

Sincerely,



Barbara Gantwerk, Assistant Commissioner
Division of Student Services

BG/PM/KR

Enclosure

c: Andrew Smarick
Peggy McDonald
Kenneth Richards
Gloucester County Executive Superintendent
Dolores Walther
Joan Ruperton

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Section I: TRANSITION TO ADULT LIFE - Noncompliance was not identified during the monitoring process

Section II: STATEWIDE ASSESSMENT - Noncompliance was not identified during the monitoring process

Section III: LEAST RESTRICTIVE ENVIRONMENT

Areas of Noncompliance Identified during Monitoring

Area	Status of Compliance
2) IEPs shall include an explanation of the extent, if any, to which child will not participate with nondisabled children. [20 U.S.C. §1412(a)(5) and 1414(d)(1)(A)(i)(V); 34 CFR §300.115 and §300.320(a)(5) and N.J.A.C. 6A:14-3.7(e)6]	Review of records indicated that for students removed general education greater than 20% of the school day, IEPs did not consistently document the supplemental aides and services considered to enable the student to be educated in general education classes and the reasons they were rejected. Noncompliance was due to inconsistent implementation of district procedures.

Corrective Action: The district is required to conduct training with child study team members regarding procedures for determining educational placements and for documenting the results in IEPs.

The district is required to conduct a meeting of the IEP team for each student whose IEP was identified as noncompliant by the NJOSEP monitors and ensure that each IEP is revised to include the required components. Names of students whose IEP were found to be noncompliant by the NJOSEP monitors will be provided to the Director of Special Education.

At the next annual review for each student with an IEP who is removed from general education settings for greater than 20 percent of the school day, the IEP team must ensure that the IEP includes the supplementary aides and services considered and the reasons why they were rejected.

The Director of Special Education is required to implement an oversight mechanism to ensure correction and ongoing compliance.

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Section IV: PARENT INVOLVEMENT

Areas of Noncompliance Identified during Monitoring

Area	Status of Compliance
1) Parents shall be given written notice of a meeting containing all the required components, in accordance with N.J.A.C. 6A:14-2.3(k)3,5; 20 U.S.C. §1414(b)(1); and 34 CFR §300.304(a).	Review of records and interviews with staff indicated that the district did not consistently provide parents with notice of meeting. Additionally, notice of meeting did not consistently include all required components. Noncompliance was due to inconsistent implementation of district procedures.
2) Written notice, which includes required components, shall be provided to parents following meetings, in accordance with N.J.A.C. 6A:14-2.3(f) and 2.3(g)1-7; 20 U.S.C. §1414(b)(1)(c)(4)(A); 34 CFR §300.304(a)(4); and 34 CFR §300.305(a).	Review of records and interviews with staff indicated that the district did not consistently provide parents with written notice following a meeting and did not include all required components. Noncompliance was due to inconsistent implementation of district procedures.
3) Eligibility meetings shall include required participants in accordance with N.J.A.C. 6A:14-2.3(k)1(i-vii); 20 U.S.C. §1414(d)(1)(B); and 34 CFR §300.321(a).	Review of records and interviews with staff indicated that for students eligible for speech and language services, the district did not consistently conduct eligibility meetings with all required participants. Noncompliance was due to inconsistent implementation of district procedures.
4) Parental consent shall be obtained whenever a member of the IEP team is excused from participating in a meeting, in accordance with N.J.A.C. 6A:14-2.3(a)6; 20 U.S.C. §1414(d)(1)(C)(i) through (iii); and 34 CFR §300.321(e).	Review of records and interviews with staff indicated that for students eligible for speech and language services, the district did not consistently obtain prior written parental consent whenever the general education teacher was excused from participating in an IEP meeting. Noncompliance was due to inconsistent implementation of district procedures.

~~**Section V: DISPROPORTIONATE REPRESENTATION** Noncompliance was not identified during the monitoring process.~~

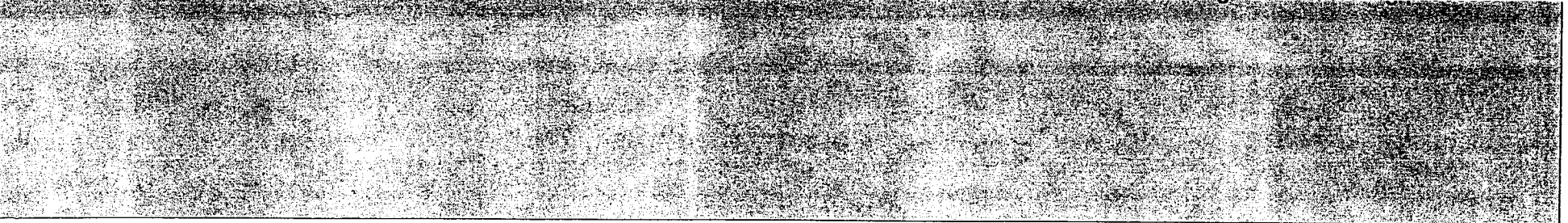


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Section VI: EVALUATIONS AND REEVALUATION

Areas of Noncompliance Identified during Monitoring

Area	Status of Compliance
<p>4) Within 20 calendar days of receipt of the written request for an evaluation, the district shall convene a meeting with required participants, in accordance with N.J.A.C. 6A:14-3.3(e).</p>	<p>Review of records indicated that for students eligible for speech and language services, the district did not consistently conduct identification meetings within 20 calendar days of a written request for an evaluation. Additionally, for students eligible for special education and related services and students eligible for speech and language services, all required participants did not attend identification meetings. Noncompliance was due to inconsistent implementation of district procedures.</p>
<p>5) A vision and audiometric screening shall be conducted for every student referred to the child study team for evaluation. The school nurse shall review and summarize available health and medical information and transmit the summary to the child study team, in accordance with N.J.A.C. 6A:14-3.4(j).</p>	<p>Review of records indicated that the school nurse did not consistently conduct a vision and hearing screening prior to the identification meeting for every student referred to the child study team for an evaluation.</p> <p>Noncompliance identified during the onsite visit was verified as corrected as result of a desk audit conducted on October 7, 2010.</p>
<p>7) The district shall obtain consent from the parent or adult student, at required times, in accordance with N.J.A.C. 6A:14-2.3(a); 20 U.S.C. §1414(a)(1)(D); and 34 CFR §300.300(a).</p>	<p>Review of records indicated that for students eligible for speech and language services, the district did not consistently obtain written consent prior to implementing the initial IEP. Noncompliance was due to inconsistent implementation of district procedures.</p> <p>Review of records and interviews with staff indicated that for students eligible for speech and language services, the district did not consistently obtain written parental consent to conduct an initial evaluation or prior to waiving a reevaluation. Noncompliance was due to inconsistent implementation of district procedures.</p>
<p>8) Evaluations shall be conducted by a multi-disciplinary team, in accordance with N.J.A.C. 6A:14-2.5(b)6 and 3.6(b).</p>	<p>Review of records indicated speech-language specialists did consistently conduct multi-disciplinary evaluations for students eligible for speech and language services. Evaluations did not consistently include an educational impact statement provided by the general education teacher following written parental consent to evaluate. Noncompliance was due to inconsistent implementation of district procedures.</p>

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<p>9) Each evaluation of a student shall include functional assessment, in accordance with N.J.A.C. 6A:14-3.4(f)4(i-vi); 20 U.S.C. §1414(b)(4) and (5); and 34 CFR §300.306(c)(i).</p>	<p>Review of records indicated that evaluations did not include all required components of a functional assessment. Noncompliance was due to inconsistent implementation of district procedures.</p>
<p>10) Within three years of the previous classification, a multi-disciplinary reevaluation shall be completed, in accordance with N.J.A.C. 6A:14-3.8(a) and 20 U.S.C. §1414(a)(2)(B)(ii).</p>	<p>Review of records indicated that for students eligible for speech and language services, the district did not consistently conduct reevaluations to determine eligibility within three years of the previous classification. Noncompliance was due to inconsistent implementation of district procedures.</p> <p>Review of records indicated that for students eligible for special education and related services, the district did not consistently determine eligibility within 60 days of written parental consent to reevaluate. Noncompliance was due to inconsistent implementation of district procedures. Noncompliance identified during the onsite visit was verified as corrected as a result of a desk audit conducted on November 15, 2010.</p>
<p>11) Reevaluation planning meetings shall include required participants, in accordance with N.J.A.C. 6A:14-2.3(k)2(i-x); 20 U.S.C. §1414(c)(1)(A)(i); and 34 CFR §300.305(a).</p>	<p>Review of records and interviews with staff indicated that for students eligible for speech and language services, the district did not consistently conduct reevaluation planning meetings with all required participants. Noncompliance identified during the onsite visit was verified as corrected as a result of a desk audit conducted on November 24, 2010.</p>
<p>14) Each child study team member shall certify in writing whether his or her report reflects his or her conclusion of eligibility of the student, in accordance with N.J.A.C. 6A:14-3.4(h)5.</p>	<p>Review of records determined that for students eligible for special education and related services, each child study team member who conducted an evaluation, did not consistently document their agreement or disagreement with the eligibility determination. Noncompliance was due to inconsistent implementation of district procedures.</p>
<p>15) A copy of the evaluation report(s) and documentation and information that will be used for a determination of eligibility shall be given to the parent or adult student not less than 10 calendar days prior to the eligibility meeting, in accordance with N.J.A.C. 6A:14-3.5(a); 20 U.S.C. §1414(b)(4); and 34 CFR §300.306(a).</p>	<p>Review of records indicated that the district did not consistently provide the parent with copies of evaluation reports not less than 10 calendar days prior to the eligibility meeting. Noncompliance was due to inconsistent implementation of district procedures.</p>

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Section VII. IEP

Areas of Noncompliance Identified during Monitoring

Area	Status of Compliance
1) IEP meetings shall be held with an appropriately configured IEP team, in accordance with N.J.A.C. 6A:14-2.3(k)2(i-x)1; 20 U.S.C. §1414(d)(1)(B); and 34 CFR §300.321(a).	<p>Review of records and interviews with staff indicated that for students eligible for speech and language services, the district did not consistently conduct IEP meetings and did not consistently include all required participants. Noncompliance was due to inconsistent implementation of district procedures.</p> <p>Review of records indicated that for students eligible for special education and related services, all required participants did not attend IEP meetings. Noncompliance was due to inconsistent implementation of district procedures.</p>
2) IEPs shall include required considerations and statements, in accordance with N.J.A.C. 6A:14-3.7(c)1-11, (e) 1-17, and (f); 20 U.S.C. §1414(d)(3)(A)(B); and 34 CFR §300.324(a)(1)(2).	<p>Review of records indicated that IEPs developed for students eligible for speech and language services did not contain and document all required considerations and statements. Noncompliance was due to inconsistent implementation of district procedures.</p> <p>Review of records indicated that IEPs developed for students eligible for special education and related services did not identify the specific location for the provision of related services. Location was identified as In-class/pullout. Noncompliance was due to inconsistent implementation of district procedures.</p>

Corrective Action: The district is required to conduct training with child study team members and speech-language specialists regarding development of IEPs.

The district is required to conduct IEP review meetings for each student whose IEP was identified as noncompliant by the NJOSEP monitors and ensure that each IEP is revised to include the required components. Names of students whose IEPs were found to be noncompliant by the NJOSEP monitors will be provided to the Director of Special Services.

At the next annual review for each student with an IEP, the district must ensure that the IEP includes all required components.

The Director of Special Services is required to conduct oversight activities to ensure correction and ongoing compliance.

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3) IEP meetings shall be conducted annually, or more often if necessary, to review and/or revise the IEP and determine placement, in accordance with N.J.A.C. 6A:14-3.7(i); 20 U.S.C. §1414(d); and 34 CFR §300.324(b)(1).

Review of records indicated that for students eligible for speech and language services, the district did not conduct IEP meetings on an annual basis. Noncompliance was due to inconsistent implementation of district procedures.

Section VIII: PROGRAMS AND SERVICES - Noncompliance was not identified during the monitoring process.