



State of New Jersey
DEPARTMENT OF EDUCATION
PO Box 500
TRENTON, NJ 08625-0500

CHRIS CHRISTIE
Governor

KIM GUADAGNO
Lt. Governor

ROCHELLE R. HENDRICKS
Acting Commissioner

October 12, 2010

Mrs. Judith Wilson, Superintendent
Princeton Regional School District
25 Valley Road
Princeton, NJ 08540

Dear Mrs. Wilson:

Subject: Special Education Monitoring – Princeton Regional 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 Princeton Regional School District's implementation of federal and state special education requirements. Between January 7, 2009 and March 2010, the New Jersey Department of Education, Office of Special Education Programs (NJOSPE), conducted onsite monitoring visits, verification visits and desk audits to determine compliance with federal and state special education requirements. The members of the monitoring team were Patricia Fair, Jane Marano and Kenneth Richards.

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 NJOSPE 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**
- **Discipline Procedures**
- **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 Princeton Regional School District was selected for the self-assessment process based on trend data that indicated disproportionate representation of specific racial/ethnic groups determined eligible for special education. (See Section VI – Table of Findings).

Monitoring Results

The enclosed Table of Findings details the onsite monitoring results with regard to the following:

Findings of noncompliance identified by the district during the self-assessment

Prior to the release of this report, the Princeton Regional School District submitted documentation demonstrating correction for all areas of noncompliance identified during self-assessment.

Findings of noncompliance identified during onsite monitoring

Findings resulting from the onsite monitoring must be corrected within one year of the date of this report. All documentation required to demonstrate completion of corrective action activities must be submitted to the following address in accordance with the timelines listed in the enclosed Table of Findings:

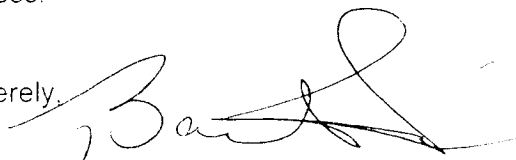
Ms. Patricia Fair
New Jersey Department of Education
Office of Special Education Programs
Southern Monitoring Office
Finlaw Building 4th Floor
199 East Broadway
Salem, NJ 08079

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 address above.

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/PF

Enclosure

c: Andrew Smarick
Peggy McDonald
Patricia Fair
Samuel Stuart
Carmen Fanucci
Agnes Golding

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Section I: TRANSITION TO ADULT LIFE – Noncompliance was not identified during self-assessment.

Areas of Noncompliance Identified during the Onsite Monitoring Visit

Area	Status of Compliance/Corrective Action	Corrective Action Requirements	Documentation Required and Timeline
<p>2) Invitation to IEP meetings provided to students and agencies providing or paying for transition services [N.J.A.C. 6A:14-2.3(k)2x and 3.7(e)13, 3.7(h); 20 U.S.C. 1414 (d)(1)(A)(i)(1)(VIII); and 34 CFR §300.322.b(2)].</p>	<p>Review of records and interview with staff indicated that students who will be turning 14 within the implementation period of the IEP were not invited to their IEP meetings when transition services were discussed, due to lack of implementation of district procedures.</p>	<p>The district is required to conduct training for child study team members regarding procedures for inviting students turning 14 to IEP meetings.</p> <p>The Director of Special Services is directed to conduct oversight activities, including periodic file review, to ensure correction and ongoing compliance.</p>	<p>Copies of training agenda and sign-in sheet to be provided by January 7, 2011.</p> <p>IEP cover pages and copies of invitation letters to the IEP meeting, for 3 students who will turn 14 during the IEP implementation period, from John Witherspoon School to be provided by March 25, 2011.</p>
<p>3) IEP requirements for students ages 14 and above, in accordance with N.J.A.C. 6A:14-3.7(e)11.</p>	<p>Review of records and interviews with staff indicated that IEPs for students ages 14 and above did not consistently include the required transition components, due to a lack of implementation of district procedures.</p>	<p>The district is required to conduct training for child study team members responsible for case management of middle school and high school students regarding procedures for developing IEPs for students age 14 and above.</p> <p>The district is directed to conduct IEP review meetings for each student whose IEP was identified as noncompliant by the</p>	<p>Copies of the training agenda and sign-in sheets to be submitted by January 7, 2011.</p> <p>Revised IEPs, which must demonstrate correction of</p>

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		<p>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.</p> <p>The district must review the IEPs of all students ages 14 and above to ensure that all required components are included. For any IEP where the required components are not included, a meeting of the IEP team must be convened to review and revise the IEP.</p> <p>The Director of Special Services is required to conduct oversight activities to ensure correction and ongoing compliance.</p>	<p>noncompliance, will be reviewed beginning March 2011.</p>
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Section II: STATEWIDE ASSESSMENT – Noncompliance was not identified during self-assessment or onsite monitoring.

Section III: DISCIPLINE – Noncompliance was not identified during onsite monitoring.

Areas of Noncompliance Identified during Self-Assessment

Area	Status of Compliance/Corrective Action	Corrective Action Requirements	Documentation Required and Timeline
1b) The case manager and parent shall be notified in writing of suspension/expulsion of a student with a disability at the time of	Noncompliance identified by the district in its self-assessment was verified as corrected during an onsite monitoring visit conducted on January 7, 2009.	CORRECTED	CORRECTED

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removal, in accordance with N.J.A.C. 6A:14-2.8(a); 20 U.S.C. 1415(k)(1)(A)(H); and 34 CFR §300.530(h).			
3) If a student with a disability is removed from his/her placement for more than 10 cumulative or consecutive days, services shall be provided, in accordance with N.J.A.C. 6A:14-2.8(e); 20 U.S.C. 1415(k)(1)(D)i; and 34 CFR §300.530(d)1.	Noncompliance identified by the district in its self-assessment was verified as corrected during an onsite monitoring visit conducted on January 7, 2011.	CORRECTED	CORRECTED

Section IV: LEAST RESTRICTIVE ENVIRONMENT

Areas of Noncompliance Identified during Self-Assessment

Area	Status of Compliance/Corrective Action	Corrective Action Requirements	Documentation Required and Timeline
1) All students with disabilities, including preschoolers and students in receiving schools, shall have access to the general education curriculum and supplementary aids and services, in accordance with N.J.A.C. 6A:14-4.2; 20 U.S.C. 1414(d)(1)(A)(i)(IV); and 34 CFR §300.320(a)(4).	<p>The district identified a need for staff members to engage in professional development and collaborative planning to support students with disabilities in general education classes.</p> <p>Noncompliance identified by the district in its self-assessment was verified as corrected during the onsite monitoring visit. The district implemented professional development activities and implemented teacher mentoring and a co-teaching model in general education classrooms.</p>	CORRECTED	CORRECTED

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Area	Status of Compliance/Corrective Action	Corrective Action Requirements	Documentation Required and Timeline
<p>2) IEPs shall include an explanation of the extent to which students are educated with nondisabled peers, including participation in nonacademic and extracurricular activities, in accordance with N.J.A.C. 6A:14-3.7(e)6 and 34 CFR §300.107.</p>	<p>Review of records and interviews with staff members indicated that at the middle and high schools, IEPs did not consistently include documentation of the supplemental aids and services considered and the reasons they were rejected, a comparison of the benefits of general education and special education and the potentially beneficial and harmful effects of a placement (general education) on the students or other students in the class. In IEPs where these components were included, they were not individualized, due to a lack of implementation of district procedures.</p>	<p>The district must conduct training for child study team members regarding district procedures for making placement decisions as part of the IEP process.</p> <p>The district is directed 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 an explanation of the extent to which the student is educated with nondisabled peers. Names of students whose IEPs were found to be noncompliant by the NJOSEP monitors will be provided to the Director of Special Services.</p> <p>The district is directed to review the IEPs of all students removed from general education settings for greater than 20% of the school day to ensure that all</p>	<p>Copy of training agenda and sign-in-sheet to be provided by January 7, 2011.</p> <p>Revised IEPs will be reviewed onsite beginning March 2011.</p>

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		<p>documentation of placement decision making is complete. For any IEP where an explanation of the extent to which the student will be educated with nondisabled peers is not included, a meeting of the IEP team must be convened to review and revise the IEP.</p> <p>The Director of Special Services is required to conduct oversight activities that include periodic review of IEPs to ensure correction and ongoing compliance.</p>	
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Section V: PARENT INVOLVEMENT- Noncompliance was not identified during self-assessment.

Results of Parent Interviews: Members of the parent advisory group indicated that overall, parents are satisfied with the district's programs and services. Parent expressed their satisfaction with communication with staff and administration and stated that their children's IEPs were implemented as written. Transition planning was identified as an area in need of improvement.

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Area	Status of Compliance/Corrective Action	Corrective Action Requirements	Documentation Required and Timeline
<p>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 and 5; 20 U.S.C. 1414(b)(1); and 34 CFR §300.304(a).</p>	<p>Review of records and interviews with staff members indicated that notices of IEP meetings, where transition was to be discussed, did not include transition as a purpose.</p> <p>In addition, notices of meetings for students eligible for speech-language services did not include all required components. The provision of notice of a meeting could not be verified, due to a lack of documentation of the date the notice was provided.</p> <p>Noncompliance was due to lack of implementation of district procedures.</p>	<p>The district is directed to conduct training for child study team members and speech-language specialists regarding the provision of notice of a meeting.</p> <p>The Director of Special Services is required to conduct oversight activities to ensure correction and ongoing compliance.</p>	<p>Copy of written procedures, revised forms, training agenda and sign-in sheets to be provided by January 7, 2011.</p> <p>Copies of revised notices provided to parents will be reviewed onsite beginning March 2011.</p>
<p>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); and 34 CFR §300.304(a)(4) and §300.305(a).</p>	<p>Review of records and interviews with staff members indicated that for students eligible for speech-language services, written notice following a meeting, was not consistently provided within required timelines and did not include all required components.</p> <p>Noncompliance was due to lack of appropriate district procedures.</p>	<p>The district is directed to review the NJOSEP sample forms for written notice and revise district forms and procedures to ensure that written notice following a meeting includes all required components and are provided when required for students eligible for speech-language services.</p>	<p>Copy of revised written procedures, training agenda sigh-in sheets to be provided by January 7, 2011.</p>

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		<p>The district is directed to conduct training for speech-language specialists regarding revised procedures.</p> <p>The Director of Special Services is required to conduct oversight activities to ensure correction and ongoing compliance.</p>	<p>Written notices provided following meetings for students eligible for speech-language services will be reviewed onsite beginning March 2011.</p>
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Section VI: DISPROPORTIONATE REPRESENTATION – Noncompliance was not identified during self-assessment.

The Princeton Regional School District was selected for the self-assessment process for the 2006-2007 school year due to disproportionate representation of specific racial/ethnic groups in special education. Specifically, analyses of data submitted as part of the Annual Data Report in December 2003, 2004, 2005 revealed over-representation of African-American and Hispanic students determined eligible for special education and related services. As indicated by data submitted to the NJOSEP, through the Annual Data Reports in December 2006, October 2007, October 2008 and October 2009, there is continued over-representation of the African-American and Hispanic students. As indicated below, the district is implementing improvement plan activities and correction of noncompliance for areas related to disproportionality identified during the onsite monitoring visit.

Additionally, the Princeton School District met the NJOSEP criteria for “Significant Disproportionality” for over-identification of African-American students determined eligible for special education and required to allocate 15% of its IDEA '08 '09, and '10 grant awards for Coordinated Early Intervening Services (CEIS) pursuant to the IDEA requirements at 34 CFR 300.646(b)(2). Based on analyses of the most recent trend data, including data from the October 2009 Annual Data Report, the district’s level of disproportionality is below the NJOSEP threshold for significant disproportionality and it is not required to allocate funds for CEIS for FY '11.

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Area(s) in Need of Continuous Improvement

Areas	Status of Improvement Plan
The district contracted with the NYU Metro Center to provide professional development activities for staff members regarding culturally/racially responsive instructional practices.	The district is in the process of implementing its improvement plan activities in accordance with established timelines.

Areas of Noncompliance Identified during the Onsite Monitoring Visit

Area	Status of Compliance/Corrective Action	Corrective Action Requirements	Documentation Required and Timeline
11) When a student with a disability transfers from one New Jersey school district to another, the child study team shall conduct an immediate review of the evaluation and the IEP and, without delay, provide a comparable program, in accordance with N.J.A.C. 6A:14; 20 U.S.C. 1414(b)(3); and 34 CFR §300.304(c).	Review of records and interviews with staff members indicated that an immediate review of the evaluation and IEP was not conducted when a student transferred into the district, due to lack of implementation of district procedures.	<p>The district is directed to conduct training for child study team members and speech-language specialists regarding district procedures for conducting immediate reviews when students with disabilities transfer to the district.</p> <p>The Director of Special Services is directed to conduct oversight activities, including periodic review of student files, to ensure correction and ongoing compliance.</p>	<p>Copies of written procedures, training agenda and sign-in sheets, to be provided by January 7, 2011.</p> <p>Copies of documentation of the review of evaluations and IEPs for 3 students with disabilities who transferred into</p>

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			the district, to be provided by March 2011.
12) 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 and b); 20 U.S.C. 1414(b)(4); and 34 CFR §300.306(a).	Review of records and interviews with staff members indicated that the district did not consistently implement procedures to ensure that parents were provided a copy of evaluation reports, not less than 10 calendar days prior to the eligibility meeting, for students evaluated to determine eligibility for speech-language services.	The district is required to conduct training for speech-language specialists regarding district procedures for providing copies of evaluation reports to parents not less than 10 calendar days prior to the eligibility meeting. The Director of Special Services is required to conduct oversight activities, including periodic review of student files, to ensure correction and ongoing compliance.	Copies of written procedures; training agenda and sign-in sheets to be provided by September 30, 2010. Notice forms will be reviewed beginning in March 2011.

Section VII: EVALUATIONS AND REEVALUATION

Areas of Noncompliance Identified during Self-Assessment

Area	Status of Compliance/Corrective Action	Corrective Action Requirements	Documentation Required and Timeline
3) The staff of the general education program shall maintain written documentation regarding type, frequency, duration and effectiveness of each intervention used, in accordance with N.J.A.C. 6A:14-3.3(c).	Noncompliance identified by the district in its self-assessment was verified as corrected during the onsite monitoring visit.	CORRECTED	CORRECTED

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<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 and interviews with staff members indicated that speech-language specialists did not document dates of referral and dates of identification meetings. As a result, compliance with timelines for identification meetings could not be determined. Noncompliance was due to lack of implementation of district procedures.</p>	<p>The district is required to conduct training for speech-language specialists regarding district procedures for convening meetings within 20 calendar days of receipt of the written request for an evaluation.</p> <p>The Director of Special Services is required to conduct oversight activities, including periodic review of student files, to ensure correction and ongoing compliance.</p>	<p>Copies of training agenda and sign-in sheets, to be provided by January 7, 2011.</p> <p>Written notice forms will be reviewed onsite beginning in March 2011.</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 and interviews with staff members indicated that the district did not consistently implement procedures for ensuring that health summaries and results of vision and hearing screenings were transmitted to the child study team prior to identification meetings at Johnson Park Elementary School. Noncompliance was due to lack of implementation of district procedures.</p>	<p>The district is directed to conduct training for child study team members and the school nurse assigned to Johnson Park Elementary School regarding the provision of health summaries and vision and hearing screening results to the child study team, when required.</p> <p>The Director of Special Services is required to periodically review</p>	<p>Copies of training agenda and sign-in sheets to be provided by January 7, 2011.</p> <p>Copies of health summaries and vision and hearing screening results and written notice</p>

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		files to ensure correction and ongoing compliance.	following the identification meetings for (3) students from Johnson Park Elementary School, to be provided by March 25, 2011.
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).	Review of records and interview with staff members indicated that the district did not implement its procedures to ensure that parental consent is obtained prior to conducting an assessment as part of a reevaluation for students eligible for speech and language services.	<p>The district is directed to conduct training for speech-language specialists regarding procedures for obtaining parental consent for assessments conducted as part of a reevaluation.</p> <p>The Director of Special Services is required to conduct oversight activities, including periodic review of student files, to ensure correction and ongoing compliance.</p>	<p>Copies of training agenda and sign-in sheets to be provided by January 7, 2011.</p> <p>Records will be reviewed onsite beginning March 2011.</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).	Review of records and interviews with staff members indicated that the district did not have procedures to ensure that all initial speech-language evaluations include the educational impact statement from the classroom teacher as part of the multi-disciplinary assessment.	The district is directed to develop written procedures for obtaining a written educational impact statement from the classroom teacher for students evaluated for eligibility for speech-language services.	Copies of written procedures, sign-in sheets and training agenda to be provided by September 30, 2010.

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		<p>The district is directed to conduct training for speech/language specialists and teachers regarding the newly developed district procedures.</p> <p>The Director of Special Services is required to conduct oversight activities, including periodic review of student files, to ensure correction and ongoing compliance.</p>	<p>Copies of initial evaluation reports for 3 students evaluated for eligibility for speech-language services from the following schools, John Witherspoon, Riverside Elementary and Johnson Park, to be provided by March 25, 2011.</p>
<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 and interviews with staff members indicated that the district did not have procedures to ensure that each initial evaluation to determine eligibility for speech and language services includes all components of a functional assessment.</p>	<p>The district is directed to develop procedures for speech-language evaluations to include completion of all required components of a functional assessment.</p> <p>The district is required to conduct training with speech-language specialists regarding the newly developed district procedures.</p> <p>The Director of Special Services is required to conduct oversight activities, including periodic review of student files to ensure correction and ongoing compliance.</p>	<p>Copies of revised written procedures, training agenda; and sign-in sheets to be provided by September 30, 2010.</p> <p>Copies of initial evaluation reports for 3 students evaluated for eligibility for speech-language services from the following schools,</p>

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			John Witherspoon, Riverside Elementary and Johnson Park to be provided by March 25, 2011.
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).	Review of records and interviews with staff members indicated that the district did not have procedures to ensure that reevaluations for students eligible for speech-language services are completed within three years of the previous classification.	<p>The district is directed to develop written procedures for conducting reevaluations for students eligible for speech-language services.</p> <p>The district is directed to conduct training for speech-language specialists regarding the newly developed district procedures.</p> <p>The Director of Special Services is required to conduct oversight activities, including periodic review of student files and reevaluation timeline logs, to ensure correction and ongoing compliance.</p>	<p>Copies of written procedures, training agenda, and sign-in sheets to be provided by January 7, 2011.</p> <p>Reevaluation timelines will be reviewed onsite beginning March 25, 2011.</p>

Section VIII: IEP – Noncompliance was not identified during self-assessment or onsite monitoring.

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Section IX: PROGRAMS AND SERVICES – Noncompliance was not identified during self-assessment or onsite monitoring.

All documentation required to demonstrate completion of corrective action activities must be submitted to the following address in accordance with the timelines listed in the above Table of Findings.

Ms. Patricia Fair
New Jersey Department of Education
Office of Special Education Programs
Southern Monitoring Office
Finlaw Building 4th Floor
199 East Broadway
Salem, NJ 08079