

State of New Jersey

DEPARTMENT OF EDUCATION PO Box 500 Trenton, NJ 08625-0500

CHRIS CHRISTIE Governor

KIM GUADAGNO Lt. Governor BRET SCHUNDLER Commissioner

July 6, 2010

Dr. Thomas McMahon, Superintendent Willingboro Public School 440 Beverly-Rancocas Road Willingboro, New Jersey 08046

Subject: Special Education Monitoring - Willingboro School District

Dear Dr. McMahon

This correspondence has been sent to inform you of the results of the New Jersey Department of Education, Office of Special Education Programs' monitoring regarding the Willingboro School District's implementation of federal and state special education requirements. Between November 2008 and the present, the New Jersey Department of Education, Office of Special Education Programs (NJOSEP), conducted onsite monitoring visits, verification visits and desk audits in the Willingboro School District to determine compliance with federal and state special education requirements. The members of the monitoring team were Patricia Fair, Caryl Carthew 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 NJOSEP 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

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- Individualized Education Program
- Programs and Services

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The Willingboro School District was selected for the self-assessment/monitoring process based on trend data that indicated: (a) disproportionate representation of specific racial/ethnic groups determined eligible for special education; and (b) a high percentage of students with disabilities placed in separate public and private special education settings. (See Sections IV and VI – Table of Findings).

### **Monitoring Results**

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

#### Status of improvement plan activities

For each area in need of continuous improvement identified by the district, the status of improvement activities designed to improve student outcomes is provided. If not identified as completed, the district must demonstrate implementation of improvement plan activities in accordance with the timelines delineated in the improvement plan. NJOSEP will continue to monitor implementation of the continuous improvement plan through additional onsite visits and desk audit.

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

For any finding of noncompliance identified by the district during self-assessment, the status of correction is provided. Prior to the release of this report, the Willingboro 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 attached Table of Findings.

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:

Ms. Patricia Fair, State Monitor New Jersey Department of Education Office of Special Education Programs Finlaw Building 4<sup>th</sup> Floor 199 East Broadway Salem, NJ 08079

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

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

Sincerely,

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Roberta Wohle, Director Office of Special Education Programs

RW/PMD/PF/rm

Enclosure

c: Division of Education System Efficiency Barbara Gantwerk Peggy McDonald Patricia Fair Lester Richens Debbie Magee Thomas Sullivan

| I  | TABLE OF FINDINGS<br>Special Education Monitoring Reso<br>DEA 2004 and New Jersey Administrative Cod<br>Willingboro School District                                |                                   |   |
|--|--|-----------------------------------|---|
| Section I: TRANSITION TO   | ADULT LIFE   |                                   |   |
| Area(s) in Need of Continuous  | Improvement  |                                   |   |
| Area   | Status of Improvement Plan   |                                   |   |
| The district developed<br>improvement plan activities to<br>expand transition services for<br>students, ages 14 and above, to<br>facilitate student movement from<br>school to post school activities.                                     | The district is in the process of implementing its in timelines. Case managers were provided with pro and required IEP documentation.                              |                                   |   |
| Areas of Noncompliance Identi  | fied during the Onsite Monitoring Visit  |                                   |   |
| Area   | Status of Compliance/Corrective Action   | Corrective Action<br>Requirements | Documentation<br>Required and<br>Timeline |
| 1) Individualized Education<br>Program (IEP) requirements for<br>students, ages 16 and above<br>[N.J.A.C. 6A:14-3.7(e)12; 20<br>U.S.C. 1414(d)(1)(A)(i)(VIII); and   | Noncompliance identified during the onsite<br>monitoring visit was verified as corrected during<br>an onsite verification visit conducted on<br>December 14, 2009. | CORRECTED                         | CORRECTED                                 |
| 34 CFR §300.320(b) and (c)].   |  |                                   |   |
| 2) Invitation of students and<br>agencies providing or paying for<br>transition services to IEP meetings<br>[N.J.A.C. 6A:14-2.3(k)2x and<br>3.7(e)13, 3.7(h); 20 U.S.C. 1414<br>(d)(1)(A)(i)(1)(VIII); and 34 CFR<br>§300.322.b(2)].       | Noncompliance identified during the onsite<br>monitoring visit was verified as corrected during<br>an onsite verification visit conducted on<br>December 14, 2009. | CORRECTED                         | CORRECTED                                 |
| 4) A summary of academic<br>achievement and functional<br>performance shall be provided to<br>each student prior to graduation, in<br>accordance with N.J.A.C. 6A:14-<br>4.11(b)4; 20 U.S.C. 1414(c)(5)(B);<br>and 34 CFR §300.305 (e)(3). | Noncompliance identified during the onsite<br>monitoring visit was verified as corrected during<br>an onsite verification visit conducted on<br>December 14, 2009. | CORRECTED                         | CORRECTED                                 |

## TABLE OF FINDINGS Special Education Monitoring Results IDEA 2004 and New Jersey Administrative Code Requirements Willingboro School District

Section II: STATEWIDE ASSESSMENT - Noncompliance was not identified during self-assessment or onsite monitoring.

# Section III: DISCIPLINE

|  | ied during Self-Assessment   |  |  |
|--|--|--|--|
| Area   | Status of Compliance/Corrective Action   | Corrective Action<br>Requirements  | Documentation<br>Required and  |
|  |  | requirementa   | Timeline   |
| 1b) The case manager and parent<br>shall be notified in writing of<br>suspension/expulsion of a student<br>with a disability at time of removal,<br>in accordance with N.J.A.C. 6A:14-<br>2.8(a); 20 U.S.C. 1415(k)(1)(A)(H);<br>and 34 CFR §300.530(h).   | Noncompliance identified by the district in its<br>self-assessment was verified as corrected<br>during a desk audit conducted on June 22,<br>2009.   | CORRECTED  | CORRECTED  |
|  | ed during the Onsite Monitoring Visit  |  |  |
| Area   | Status of Compliance/Corrective Action   | Corrective Action<br>Requirements  | Documentation<br>Required and<br>Timeline  |
| 2) Removals of a student with a disability from his/her placement for disciplinary reasons constitutes a change in placement if the removal is more than 10 consecutive days or a series of short- term removals that accumulate to more than 10 days and constitute a pattern, in accordance with N.J.A.C. 6A:14-2.8(e); 20 U.S.C. 1415(k)(1)(D); and 34 CFR §300.530(d). | Review of records and interviews with staff<br>indicated that when a series of short term<br>removals accumulated to more than 10 days, it<br>was not consistently determined whether the<br>removals constituted a change of placement.<br>Noncompliance was due to lack of<br>implementation of district procedures. | The district is directed to conduct<br>training for child study team<br>members and administrators<br>regarding district procedures for<br>determining whether a series of<br>removals constitutes a change in<br>placement.<br>The Director of Special Services<br>is directed to conduct oversight<br>activities, that include periodic<br>review of student files, to ensure<br>correction and ongoing<br>compliance. | Copies of training<br>agenda and sign-<br>in sheets to be<br>provided by<br><b>October 1, 2010</b><br>Onsite verification<br>will be conducted<br>in <b>January 2011</b> |

|  | TABLE OF FINDINGS  |  | ~  |
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|  | Special Education Monitoring Re  | eulte  |  |
| ır   | DEA 2004 and New Jersey Administrative Co  |  |  |
| 11   | -  | -  |  |
|  | Willingboro School District  |  |  |
| 6) When it is determined that a<br>removal of a student with a<br>disability constitutes a change of<br>placement, the relevant IEP team<br>members and the parent shall<br>meet to determine if the conduct<br>was a manifestation of the<br>student's disability, in accordance<br>with N.J.A.C. 6A:14-Appendix A<br>and 20USC§1415(k)(1)(E)i. | Review of procedures and interview with staff<br>members indicated that district procedures did<br>not include the required factors that must be<br>considered when determining whether student<br>conduct was a manifestation of the student's<br>disability. The procedures did not include a<br>discussion of whether the conduct was: 1)<br>caused by, or was in direct and substantial<br>relationship to, the child's disability; or 2) a<br>direct result of the LEA's failure to implement<br>the IEP. | The district is directed to revise<br>its procedures to include the<br>documentation of all required<br>considerations when relevant IEP<br>team members conduct a<br>manifestation determination.<br>The district is directed to conduct<br>training with administrators and<br>child study team members<br>regarding revised district<br>procedures. | Copy of written<br>procedures,<br>training agenda<br>and sign-in sheet<br>to be provided by<br><b>October 1, 2010</b><br>Onsite verification<br>will begin <b>January</b><br><b>2011</b> |
|  |  | The Director of Special Services<br>is directed to conduct oversight<br>activities that include periodic<br>review of student files to ensure<br>correction and ongoing<br>compliance.   |  |
| Section IV-1 EAST RESTRI   | CTIVE ENVIRONMENT - Noncompliance  |  | smont  |
| Section IV. LEAST MESTIN   |  | was not identified during sen-asses:   |  |
| high percentage of students with<br>for the Annual Data Report demor<br>SPP target of 8% for this placeme<br>be made in accordance with the N  | as selected for the self-assessment process due<br>disabilities placed in separate public and privat<br>nstrating a decrease in the public and private se<br>ent category for the 2009-2010 school year. The<br>ew Jersey Administrative Code 6A:14-3.7 and 4.   | e settings. The district submitted (<br>eparate placement rate to 7%. The (<br>e district is reminded that all place)  | data in October 200<br>district met the stat   |
| Area(s) in Need of Continuous  |  |  | 1 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4  |
| Area   | Status of Improvement Plan   |  | 新学》的《 <b>斯集课》的</b> 是否  |
| The district developed<br>improvement plan activities to<br>increase differentiated instruction<br>practices and supplementary aides   | The district is in the process of implementing timelines. Read 180 and Star Math were implem students with disabilities placed in general education.   | nented across all schools to provide a   |  |

| TABLE OF FINDINGS   Special Education Monitoring Results   IDEA 2004 and New Jersey Administrative Code Requirements   Willingboro School District   Areas of Noncompliance Identified during the Onsite Monitoring Visit   Corrective Action   Area   Status of Compliance/Corrective Action   Requirements   Timeline |  |  |   |  |
|---|--|--|---|--|
|   |  |  |   |  |
|   |  | The district is directed to conduct<br>IEP review meetings for each<br>student whose IEP was identified  | Revised IEPs,<br>which must<br>demonstrate  |  |
|   |  | as noncompliant by the NJOSEP<br>monitors and ensure that each<br>IEP is revised to include complete<br>documentation of individualized<br>placement decision making.<br>Names of students whose IEPs<br>were found to be noncompliant by<br>the NJOSEP monitors will be<br>provided to the Director of Special<br>Services. | correction of<br>noncompliance,<br>will be reviewed<br>onsite beginning<br>January 2011 |  |
|   |  | The district is directed to review<br>the IEPs of all students removed<br>from general education settings<br>for greater than 20% of the school<br>day to ensure that all  | A sample of IEPs<br>will be reviewed<br>onsite beginning<br>January 2011                |  |

| ID  | TABLE OF FINDINGS<br>Special Education Monitoring Res<br>EA 2004 and New Jersey Administrative Coo<br>Willingboro School District  |  | 5   |
|---|--|--|---|
|   |  | documentation of placement<br>decision making is complete. For<br>any IEP where the explanation of<br>the extent to which the student will<br>be educated with nondisabled<br>peers is incomplete, a meeting of<br>the IEP team must be convened to<br>review and revise the IEP.<br>The Director of Special Services<br>is directed to conduct oversight<br>activities to ensure correction<br>and ongoing compliance. These<br>activities must include periodic<br>IEP review. |   |
| 4) For students in a separate<br>setting, IEPs shall include activities<br>to transition students to a less<br>restrictive environment, in<br>accordance with N.J.A.C. 6A:14-<br>4.2(a)4. | Review of records and interviews with staff<br>indicated that the district did not have<br>procedures to ensure that IEPs for students with<br>disabilities, educated in separate public or<br>private settings, included activities to transition<br>students to less restrictive environments. | The district is directed to develop<br>procedures and conduct training<br>for child study team members<br>regarding the newly developed<br>procedures pertaining to the<br>requirement that IEPs include<br>activities to transition students to   | Copy of written<br>procedures<br>agenda and sign<br>in sheet to be<br>provided to<br>NJOSEP by<br>October 1, 2010                               |
|   |  | less restrictive environments.<br>The district is directed to conduct<br>IEP review meetings for each<br>student whose IEP was identified<br>as noncompliant by the NJOSEP<br>monitors and ensure that each<br>IEP is revised to include activities<br>to transition the student to a less<br>restrictive environment. Names of<br>students whose IEPs were found<br>to be noncompliant by the<br>NJOSEP monitors will be provided<br>to the Director of Special Services.       | Revised IEPs,<br>which must<br>demonstrate<br>correction of<br>noncompliance,<br>will be reviewed<br>onsite beginning<br>in <b>January 2011</b> |

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|---|--|---|---|
|   | TABLE OF FINDINGS  |   |   |
| -   | Special Education Monitoring Res   |   |   |
| I   | DEA 2004 and New Jersey Administrative Co  | de Requirements   |   |
|   | Willingboro School District  |   | 1   |
|   |  | The district is directed to review<br>the IEPs of all students removed<br>from general education settings<br>for greater than 20% of the school<br>day to ensure that all<br>documentation of placement<br>decision making is complete. For<br>any IEP where activities to<br>transition the student to a less<br>restrictive environment are not<br>included, a meeting of the IEP<br>team must be convened to review<br>and revise the IEP.<br>The Director of Special Services<br>is directed to conduct oversight<br>activities that include periodic | A sample of IEPs<br>will be reviewed<br>onsite beginning ir<br>January 2011 |
| Section V: PARENT INVOL   | VEMENT - Noncompliance was not identified  | review of students IEPs to<br>ensure correction and ongoing<br>compliance.  |   |
| Section V. PARENT INVOE   |  | auring sen-assessment.  |   |
| Areas of Noncompliance Ident  | fied during the Onsite Monitoring Visit  |   |   |
| Area  | Status of Compliance/Corrective Action   | Corrective Action<br>Requirements   | Documentation<br>Required and<br>Timeline                                   |
| 1) Parents shall be given written<br>notice of a meeting containing all<br>the required components, in<br>accordance with N.J.A.C. 6A:14-<br>2.3(k)3 and 5; 20 U.S.C.<br>1414(b)(1); and 34 CFR<br>§300.304(a). | Noncompliance identified during the onsite<br>monitoring visit was verified as corrected during<br>an onsite verification visit conducted on<br>December 14, 2009. | CORRECTED   | CORRECTED   |

|   | TABLE OF FINDINGS<br>Special Education Monitoring Re<br>DEA 2004 and New Jersey Administrative Co<br>Willingboro School District  | de Requirements   |  |
|---|---|---|--|
| 2) Written notice, which includes<br>required components, shall be<br>provided to parents following<br>meetings, in accordance with<br>N.J.A.C. 6A:14-2.3(f) and 2.3(g)1-<br>7; 20 U.S.C. 1414(b)(1)(c)(4)(A);<br>and 34 CFR §300.304(a)(4) and<br>§300.305(a). | Noncompliance identified during the onsite<br>monitoring visit was verified as corrected during<br>an onsite verification visit conducted on<br>December 14, 2009.                                    | CORRECTED   | CORRECTED  |
| 6) Each district shall ensure that a Special Education Parent Advisory group is in place in the district, in accordance with N.J.A.C. 6A:14-1.2(h).   | Noncompliance identified during the onsite<br>monitoring visit was verified as corrected during<br>an onsite verification visit conducted on<br>December 14, 2009.                                    | CORRECTED   | CORRRECTED   |
| onsite monitoring visit.  | ONATE REPRESENTATION - Noncompli  | ance was not identified during sen-   | assessment or the  |
| onsite monitoring visit.<br>The Willingboro School District v<br>indicating a disproportionate rep<br>determinations for special educa<br>inappropriate identification. Ana<br>evident.   | was selected for the self-assessment process<br>presentation of a specific racial/ethnic group (<br>ition. During the monitoring process it was d<br>lyses of district data for 2007, 2008, 2009 reve | due to trend data (December 2003<br>i.e. Black – all disabilities) with r<br>letermined that the disproportiona | , 2004, 2005, 2006<br>espect to eligibility<br>was not due to      |
| onsite monitoring visit.<br>The Willingboro School District v<br>Indicating a disproportionate rep<br>determinations for special educa  | was selected for the self-assessment process<br>presentation of a specific racial/ethnic group (<br>ition. During the monitoring process it was d<br>lyses of district data for 2007, 2008, 2009 reve | due to trend data (December 2003<br>i.e. Black – all disabilities) with r<br>letermined that the disproportiona | , 2004, 2005, 2006<br>espect to eligibility<br>lity was not due to |

| TABLE OF FINDINGS<br>Special Education Monitoring Results<br>IDEA 2004 and New Jersey Administrative Code Requirements<br>Willingboro School District  |  |                                   |   |  |
|--|--|-----------------------------------|---|--|
| Section VII: EVALUATION  | 上。於一些我的问题的? 计参加分   |                                   |   |  |
| Areas of Noncompliance Identit   |  |                                   |   |  |
| + Area   | Status of Compliance/Corrective Action   | Corrective Action<br>Requirements | Documentation<br>Required and<br>Timeline |  |
| 2) Interventions in the general<br>education setting shall be provided<br>to students exhibiting academic<br>difficulties and shall be utilized, as<br>appropriate, prior to referring a<br>student for an evaluation, in<br>accordance with N.J.A.C. 6A:14-<br>3.3(b); 20 U.S.C. 1413(f)(2); and<br>34 CFR §300.226(b). | Noncompliance identified by the district in the<br>self-assessment was verified as corrected<br>during a desk audit conducted on June 22,<br>2009. |                                   | CORRECTED                                 |  |
| 3) The staff of the general<br>education program shall maintain<br>written documentation regarding<br>type, frequency, duration and  | Noncompliance identified by the district in the self-assessment was verified as corrected during a desk audit conducted on June 22, 2009.          | CORRECTED                         | CORRECTED                                 |  |
| effectiveness of each intervention<br>used, in accordance with N.J.A.C.<br>6A:14-3.3(c).   |  |                                   |   |  |
| 7) The district shall obtain consent<br>from the parent or adult student, at<br>required times, in accordance with<br>N.J.A.C. 6A:14-2.3(a); 20 U.S.C.<br>1414(a)(1)(D); and 34 CFR<br>§300.300(a).  | Noncompliance identified by the district in the self-assessment was verified as corrected during a desk audit conducted on June 22, 2009.          |                                   | CORRECTED                                 |  |
| 11) Reevaluation planning<br>meetings shall include required<br>participants, in accordance with<br>N.J.A.C. 6A:14-2.3(k)2(i-x); 20<br>U.S.C. 1414(c)(1)(A)(i); and 34<br>CFR §300.305(a).   | Noncompliance identified by the district in the self-assessment was verified as corrected during a desk audit conducted on June 22, 2009.          | CORRECTED                         | CORRECTED                                 |  |

| 7<br>TABLE OF FINDINGS<br>Special Education Monitoring Results<br>IDEA 2004 and New Jersey Administrative Code Requirements<br>Willingboro School District  |  |  |  |
|---|--|--|--|
| 14) Each child study team member<br>shall certify in writing whether his<br>or her report reflects his or her<br>conclusion of eligibility of the<br>student, in accordance with<br>N.J.A.C. 6A:14-3.4(h)5. | Noncompliance identified by the district in the<br>self-assessment was verified as corrected<br>during a desk audit conducted on June 22,<br>2009.   | CORRECTED  | CORRECTED  |
|   | ed during the Onsite Monitoring Visit  |  |  |
| Area  | Status of Compliance/Corrective Action   | Corrective Action<br>Requirements  | Documentation<br>Required and<br>Timeline  |
| 4) Within 20 calendar days of<br>receipt of the written request for an<br>evaluation, the district shall<br>convene a meeting with required<br>participants, in accordance with<br>N.J.A.C. 6A:14-3.3(e).   | Review of records and interviews with staff<br>members indicated that the district did not<br>ensure that an initial evaluation meeting was<br>consistently convened within 20 calendar days<br>of receipt of a written request for an evaluation.<br>Noncompliance was due to lack of<br>implementation of district procedures. | The district is directed to conduct<br>training for child study team<br>members and speech-language<br>specialists regarding procedures<br>for conducting identification<br>meetings.<br>The Director of Special Services<br>is directed to conduct oversight<br>activities to ensure correction | Copies of the<br>training agenda<br>and sign-in sheets<br>to be provided to<br>NJOSEP by<br><b>October 1, 2010</b><br>Copies of<br>referrals, notices<br>of meetings and   |
|   |  | and ongoing compliance.  | identification<br>meeting sign-in<br>sheets for (3)<br>students, for<br>whom an initial<br>evaluation was<br>conducted, from<br>each of the<br>following schools:<br>High School,<br>Levitt, Memorial,<br>Garfield East and<br>Stuart to be<br>provided by<br>December 17,<br>2010 |

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|  | TABLE OF FINDINGS   |   |  |
|  | Special Education Monitoring Res  |   |  |
| 11   | DEA 2004 and New Jersey Administrative Co   | de Requirements   |  |
|  | Willingboro School District   |   |  |
| 5) A vision and audiometric<br>screening shall be conducted for<br>every student referred to the child<br>study team for evaluation. The<br>school nurse shall review and<br>summarize available health and<br>medical information and transmit<br>the summary to the child study<br>team, in accordance with N.J.A.C. | Review of records and interviews with staff<br>indicated that the district did not consistently<br>implement procedures for ensuring that health<br>summaries and vision and hearing screening<br>results are consistently transmitted to the child<br>study team for consideration at the identification<br>meetings. Noncompliance was due to lack of<br>implementation of district procedures. | The Director of Special Services<br>is directed to conduct training for<br>child study team members and<br>school nurses regarding the<br>provision of health summaries<br>and hearing and vision screening<br>results to the child study team<br>prior to identification meetings. | Copies of training<br>agenda and sign-<br>in sheets to be<br>provided to<br>NJOSEP by<br><b>October 1, 2010</b>  |
| 6A:14-3.4(j).  |   | The Director of Special Services<br>is directed to periodically review<br>files to ensure correction and<br>ongoing compliance.   | Copies of health<br>summaries/vision<br>with hearing<br>screenings and<br>written notice<br>following the<br>identification<br>meeting for (3)<br>students, for<br>whom an initial<br>evaluation was<br>conducted during |
|  |   |   | this school year,<br>at the following<br>schools: High<br>School, Levitt<br>Memorial, Garfield<br>East and Stuart to<br>be provided by<br>December 17,<br>2010   |
|  |   |   |  |

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|---|---|--|
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| •   | de Nequilements   |  |
| Review of records and interviews with staff<br>members indicated that the district does not<br>have procedures to ensue that all speech and<br>language initial evaluations include the<br>educational impact statement from the<br>classroom teacher, which would meet the<br>criteria for a multidisciplinary evaluation. | The Director of Special Services<br>is directed to develop written<br>procedures and conduct training<br>for speech-language specialists<br>to ensure that initial evaluations<br>include the educational impact<br>statement from the classroom<br>teacher.<br>The Director of Special Services<br>is directed to periodically review<br>student files to ensure correction<br>and ongoing compliance                                      | Copies of written<br>procedures,<br>training agenda,<br>sign-in sheets and<br>initial evaluation<br>reports for 3<br>students referred<br>for speech and<br>language services<br>from Levitt,<br>Memorial, Garfield<br>East and Stuart, to<br>be provided by<br><b>October 1, 2010</b>   |
| Review of records and interview with staff<br>members indicated that initial evaluations did<br>not consistently include all required components<br>of a functional assessment. Noncompliance<br>was due to lack of implementation of district<br>procedures.   | The Director of Special Services<br>is directed to conduct training<br>with child study team members<br>and speech-language specialists<br>regarding procedures for<br>functional assessment.<br>The Director of Special Services<br>is directed to conduct oversight<br>activities to ensure correction<br>and ongoing compliance.   | Copies of written<br>procedures,<br>training agenda,<br>sign-in sheets,<br>and initial<br>evaluation reports<br>for (3) students<br>referred for special<br>education and (3)<br>students for<br>speech and<br>language services<br>from each of the<br>following schools:<br>Levitt, Memorial,<br>Garfield East and<br>Stuart, to be<br>provided by<br>October 1, 2010  |
|   | Special Education Monitoring Res<br>EA 2004 and New Jersey Administrative Con<br>Willingboro School District<br>Review of records and interviews with staff<br>members indicated that the district does not<br>have procedures to ensue that all speech and<br>language initial evaluations include the<br>educational impact statement from the<br>classroom teacher, which would meet the<br>criteria for a multidisciplinary evaluation. | Special Education Monitoring ResultsEA 2004 and New Jersey Administrative Code RequirementsWillingboro School DistrictReview of records and interviews with staff<br>members indicated that the district does not<br>have procedures to ensue that all speech and<br>language initial evaluations include the<br>educational impact statement from the<br>classroom teacher, which would meet the<br>criteria for a multidisciplinary evaluation.The Director of Special Services<br>is directed to develop written<br>procedures and conduct training<br>for speech-language specialists<br>to ensure that initial evaluations<br>include the educational impact<br>statement from the classroom<br>teacher.<br>The Director of Special Services<br>is directed to periodically review<br>student files to ensure correction<br>and ongoing complianceReview of records and interview with staff<br>members indicated that initial evaluations did<br>not consistently include all required components<br>of a functional assessment. Noncompliance<br>was due to lack of implementation of district<br>procedures.The Director of Special Services<br>is directed to conduct training<br>with child study team members<br>and speech-language specialists<br>regarding procedures for<br>functional assessment.The Director of Special Services<br>is directed to conduct oversight<br>activities to ensure correction |

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|   | Special Education Monitoring Res   |   |   |
| ID  | EA 2004 and New Jersey Administrative Co   | de Requirements   |   |
|   | Willingboro School District  |   |   |
| 10) Within three years of the<br>previous classification, a multi-<br>disciplinary reevaluation shall be<br>completed, in accordance with<br>N.J.A.C. 6A:14-3.8(a) and 20<br>U.S.C. 1414(a)(2)(B)(ii).  | Review of records and interviews with staff<br>members indicated that reevaluations were not<br>consistently completed within the required three<br>year timeline. Noncompliance was due to lack<br>of implementation of district procedures.  | The Director of Special Services<br>is directed to conduct training for<br>child study team members and<br>speech-language specialists<br>regarding district procedures for<br>conducting reevaluations.<br>The Director of Special Services<br>is directed to periodically review<br>student files and evaluation logs<br>from the district's electronic<br>tracking system to ensure<br>correction and ongoing<br>compliance. | Copies of written<br>procedures,<br>training agenda,<br>sign-in sheets,<br>and reevaluation<br>logs for all<br>students eligible<br>for special<br>education and<br>related services<br>and speech and<br>language services<br>to be provided by<br>October 1, 2010   |
| 15) A copy of the evaluation<br>report(s) and documentation that<br>will be used to determine eligibility<br>shall be given to the parent or adult<br>student not less than 10 calendar<br>days prior to the eligibility meeting,<br>in accordance with N.J.A.C. 6A:14-<br>3.5(a); 20 U.S.C. 1414(b)(4); and<br>34 CFR §300.306(a). | Review of records and interviews with staff<br>members indicated that the district did not<br>implement procedures to ensure that parents<br>are provided a copy of evaluation report(s) not<br>less than 10 calendar days prior to an eligibility<br>meeting for students evaluated for special<br>education and related services and students<br>evaluated for speech and language services. | The district is directed to conduct<br>training for child study team<br>members and speech and<br>language specialists regarding<br>procedures for providing a copy<br>of evaluation report(s) not less<br>than 10 calendar days prior to<br>the eligibility meeting.<br>The Director of Special Services<br>is directed to periodically review<br>student files to ensure correction<br>and ongoing compliance.                | Copies of written<br>procedures,<br>training agenda,<br>sign-in sheets and<br>notices of eligibility<br>determination<br>meetings, meeting<br>attendance sheets<br>and dated<br>documentation of<br>provision of<br>reports to parents<br>for 3 students<br>involved in the<br>initial evaluation<br>process from each<br>of the following<br>schools: High<br>School, Levitt,<br>Memorial, Garfield<br>East and Stuart to<br>be provided by<br>October 1, 2010 |

| Special Education Monitoring Results<br>IDEA 2004 and New Jersey Administrative Code Requirements<br>Willingboro School District<br>Section VIII: IEP - Noncompliance was not identified during self-assessment.<br>Areas of Noncompliance Identified during the Onsite Monitoring Visit |   |   |  |  |
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| 1) IEP meetings shall be held with<br>an appropriately configured IEP<br>team in accordance with N.J.A.C.<br>6A:14-2.3(k)2(i-x)1; 20 U.S.C.<br>1414(d)(1)(B); and 34 CFR<br>§300.321(a).   | Review of records and interviews with staff<br>members indicated that the district did not have<br>procedures to ensure that the required<br>participants attend IEP meetings for students<br>eligible for special education and related<br>services and students eligible for speech -<br>language services. | The district is directed to develop<br>written procedures and conduct<br>training for child study team<br>members and speech-language<br>specialists regarding the<br>requirement to conduct IEP<br>meetings with mandated<br>participants and to maintain<br>documentation of their<br>participation.<br>The Director of Special Services<br>is required to periodically review                              | Copies of written<br>procedures;<br>training agenda;<br>sign-in sheets, to<br>be provided by<br><b>October 1, 2010</b><br>Onsite verification<br>will be conducted<br>beginning<br><b>January 2011</b> |  |
| 2) IEPs shall include required<br>considerations and statements, in<br>accordance with N.J.A.C. 6A:14-<br>3.7(c)1-11, (e) 1-17, and (f); 20<br>U.S.C. 1414(d)(3)(A)(B); and 34<br>CFR §300.324(a)(1)(2).   | Review of records and interviews with staff<br>members indicated that IEPs for students<br>receiving speech-language services did not<br>contain all required considerations and<br>statements. Noncompliance was due to lack of<br>district procedures.  | students' files to ensure<br>correction and ongoing<br>compliance.<br>The district revised its<br>procedures for developing IEPs<br>for students receiving speech-<br>language services. In<br>September 2009, the district<br>implemented an electronic IEP<br>system which is formatted to<br>include all required IEP<br>components.<br>The district conducted training for<br>staff members regarding IEP | Onsite verification<br>will be conducted<br>beginning<br>January 2011  |  |

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| TABLE OF FINDINGS<br>Special Education Monitoring Results<br>IDEA 2004 and New Jersey Administrative Code Requirements<br>Willingboro School District  |   |  |   |  |
|  |   | The Director of Special Services<br>is directed to periodically review<br>students' IEPs to ensure<br>correction and ongoing<br>compliance.  |   |  |
| 3) IEP meetings shall be<br>conducted annually, or more often<br>if necessary, to review and/or<br>revise the IEP and determine<br>placement, in accordance with<br>N.J.A.C. 6A:14-3.7(i); 20 U.S.C.<br>1414(d); and 34 CFR<br>§300.324(b)(1). | Review of records and interviews with staff<br>members indicated that the district did not<br>implement procedures to ensure that for<br>students eligible for speech-language services,<br>IEP meetings are conducted annually or more<br>often if necessary. Noncompliance was due to<br>lack of implementation of district procedures. | The district conducted training for<br>child study team members and<br>speech-language specialists<br>regarding district procedures for<br>monitoring timelines for<br>conducting annual reviews.<br>The district is directed to identify<br>the most recent IEP meeting date<br>for each student eligible for<br>speech-language services and<br>ensure that a review of the IEP is<br>conducted within one year of that<br>date.<br>The Director of Special Services | Copies of training<br>agenda and sign-<br>in sheets to be<br>provided by<br><b>October 1, 2010</b><br>Onsite verification<br>will be conducted<br>beginning in<br><b>January 2011</b> |  |
|  |   | is directed to periodically review<br>students' files to ensure<br>correction and ongoing<br>compliance.   |   |  |
| 6) IEPs shall be implemented as<br>written, in accordance with 20<br>U.S.C. § 1412 (a)(16)(D).   | Review of records and interview with staff<br>members indicated that IEPs for students<br>receiving speech -language services were not<br>consistently implemented as written. District<br>staff members indicated during interviews that<br>noncompliance was due to a lack of sufficient<br>speech-language specialists.                | CORRECTED  | CORRECTED   |  |
|  | The district hired additional staff members in the<br>Summer and Fall of 2009 and provided<br>compensatory services to students who had not<br>received services as per their IEPs.   |  |   |  |

## TABLE OF FINDINGS Special Education Monitoring Results IDEA 2004 and New Jersey Administrative Code Requirements Willingboro School District

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

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, State Monitor New Jersey Department of Education Office of Special Education Programs Finlaw Building 4<sup>th</sup> Floor 199 East Broadway Salem, NJ 08079