

**New Jersey Department of Education  
Special Education Receiving School Monitoring**

**Receiving School:** Strang School

**County:** Salem

**Monitoring Dates:** May 7, 8, 9, 2003

**Monitoring Team:** Barbara Ciancaglini, Mary Heade, Elaine Lerner, James Curry

**Background Information:**

During the 2002 – 2003 school year, Strang School conducted a self-assessment of policies, procedures, programs, services, and student outcomes. This self-assessment component of the monitoring process provided Strang School with an opportunity to evaluate its strengths and areas of need with regard to:

- The provision of a free, appropriate public education (FAPE) for students with disabilities in the least restrictive environment;
- The development and implementation of policies and procedures resulting in procedural compliance; and
- The organization and delivery of programs and services to meet the needs of the students with disabilities.

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. Strang School developed an improvement plan to address identified areas of need.

The New Jersey Department of Education (NJDOE) 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.

During the monitoring process, the monitoring team reviewed receiving school documents such as policies and procedures, student records from sending districts, lesson plans, services as indicated in IEPs, staff evaluations, student count information, master student lists, class lists, schedules of students/teachers/related service personnel, and other relevant information. Interviews were conducted with Strang School's special education administrators, building principals, special education teachers and related service personnel.

**Areas Demonstrating Compliance With All Standards:**

**Discipline** was determined to be an area of compliance by Strang School during self-assessment and by the NJDOE during the on-site visit.

**Section I: General Provisions**

**Summary of Findings:**

During self-assessment, Strang School accurately identified themselves compliant in the areas of staff development and annual reports.

Areas of need were identified during the on-site visit regarding policies, procedures and amendments and provision of programs in nonsectarian settings.

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**Areas of Need:**

**Policies, Procedures and Amendments** - During the on-site visit through record review and review of files at the Salem County Office of Education, it was determined that policies and procedures were not submitted to the County Office of Education.

- **Within 45 days, the required policies and procedures must be submitted to the county office of education for review and approval. The school must revise their improvement plan to include procedures to ensure that policies and procedures and subsequent amendments are submitted to the county office in a timely manner. The plan must include an administrative oversight component to ensure consistent implementation of the procedures.**

**Provision of Programs in Nonsectarian Settings** – During the on-site visit, a review of school documents, staff interviews and classroom and building visitations indicated that religious activities and displays were part of the school’s programs and services. As a requirement for approval, all private schools sign and submit an affidavit assuring that all programs are nonsectarian. As a result of the on-site visit it was determined that that Strang School is in violation of the signed affidavit.

- **The school will immediately remove all religious displays from the school building and cease all religious activities and instruction. In addition, the school must revise its improvement plan to include procedures to ensure that the school provides programs and services that are nonsectarian and in compliance with code requirements. The plan must include staff training and an administrative oversight component to ensure consistent implementation of the procedures.**

**Section II: Free, Appropriate Public Education**

**Summary of Findings:**

During self-assessment, Strang School accurately identified themselves compliant in the areas of length of school day and year, provision of physical education, maintenance of hearing aids, services provided at no cost to parents and observation of programs.

Areas of need were identified during the on-site visit regarding provision of programs and related services as per IEP during the school year and extended school year programs.

**Areas of Need:**

**Provision of Program and Related Services as per IEP** – During the on-site through record review and staff interviews, it was determined that educational programs and related services, such as speech and counseling services are not consistently provided to students during the school year and the extended school year as specified in their IEPs.

- **The school will immediately review all IEPs and related services logs for those students attending the Extended School Year (ESY) program to ensure that all students received all programs and services as indicated in**

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their IEPs. In the event that students did not receive all services, the school must address how districts will be notified that the services were not provided to students. The school must also address the arrangements that Strang School will make to provide compensatory services. The school will also review all IEPs and related services logs for currently enrolled students to ensure that all students are receiving all programs and services indicated in their IEPs. In addition, the school will revise its improvement plan to include procedures to ensure that programs and related services are provided to students as per their IEPs. The plan must include procedures, in-service, a mechanism to determine the effectiveness of the training and an administrative oversight component to ensure the consistent, compliant implementation of the procedures.

**Section III: Staff Requirements**

**Summary of Findings:**

During self-assessment Strang School accurately identified themselves compliant in the areas of private school dual employment and having an approved professional development plan.

Areas of need were identified during the on-site visit regarding certified/licensed staff, employment/job descriptions of paraprofessionals, and criminal history verification.

**Areas of Need:**

**Certified/Licensed Staff-** During the on-site visit, thorough staff interviews it was determined that the principal is assigned to the school part-time, rather than on a full-time basis, without written approval to the county office of education. Therefore, certified teaching staff members are not consistently supervised by a principal or other appropriately certified personnel. In addition, through staff interviews and record review, it was determined that counseling services were not consistently provided by staff members with DOE certification.

- **The school will revise its improvement plan to ensure that a principal is employed at the school full-time or within 14 days the school will submit a written request for approval to the county office of education to employ a part-time principal and an appropriately certified supervisor, who will act as the administrator in charge when the principal is not on-site. The school will also revise its improvement plan to ensure that related services are provided by DOE certified staff. The plan must include administrative oversight component to ensure consistent implementation of the procedures.**

**Employment/Job Descriptions of Paraprofessionals –** During the on-site visit through record review conducted at the school and review of records at the Salem County Office of Education, it was determined that the school has not submitted job descriptions of paraprofessionals to the county office of education.

- **Within 45 days, the school will submit job descriptions of paraprofessionals to the county office of education. In addition, the school will revise its improvement plan to include procedures to ensure that job**

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descriptions for paraprofessional are submitted to the county office of education in a timely manner. The plan must also include an administrative oversight to ensure consistent implementation of the procedures.

**Criminal History Verification** - During the on-site visit, through record review, it was determined that the school does not maintain documentation of criminal history verification for staff employed by the school. A review of records at the Salem County Office of Education indicated inconsistent procedures for submitting criminal history verification.

- **The school will immediately schedule criminal history verification for all staff members employed by the school and request written permission for emergent hiring from the county superintendent pending completion of the review. In addition, the school will revise its improvement plan to include procedures to ensure that all staff members employed by the school have completed the criminal history verification or that the school has received written permission from the county superintendent for emergent hiring prior to employment. The plan must include procedures to ensure that written documentation of compliance with criminal history review requirements is maintained at the school. The plan must also include an administrative oversight component to ensure consistent implementation of the procedures.**

**Section IV: Facility Requirements**

**Summary of Findings:**

During self-assessment, Strang School accurately identified themselves compliant in the areas of programs provided in approved facilities and certificates of occupancy and inspections.

During the self-assessment process, Strang School identified concerns in the area of fire drills. The receiving school's improvement plan is sufficient to address this area of need.

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

**Section V: Individualized Education Plan/Annual Review**

**Summary of Findings:**

During self-assessment, Strang School accurately identified themselves compliant in the areas of IEP accessibility, observation of proposed placement, statewide testing and progress reports.

During the self-assessment process, Strang School identified concerns in the area of IEP meetings conducted annually and having current IEPs. **The school's improvement plan is insufficient to address these areas of need because they lack procedures and an administrative oversight component to ensure the consistent, compliant implementation of the procedures. In the area of current IEPs, the school is providing educational services to students who are lacking IEPs due to emergency placements by other state agencies. The school is unable to provide immediate instruction as reflected in IEPs. Therefore, the plan must include**

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**procedures for communicating with state agencies responsible for their placements. The plan must be revised to include these components.**

Additional areas of need were identified during the on-site visit regarding IEP meetings conducted with appropriate participants, signatures present on IEPs, communication to sending district regarding missing IEP components, and informing teachers/providers of IEP responsibilities.

### **Areas of Need:**

**IEP Meetings Conducted with Appropriate Participants** – During the on-site visit, through record review and staff interview, it was determined that required receiving school participants do not consistently attend IEP meetings, specifically a special education teacher. The educational supervisor attends each meeting, often in place of a teacher. In addition, students are not consistently attending meetings, as appropriate.

- **The school will revise its improvement plan to include procedures to ensure that teachers and students, as appropriate, regularly attend IEP meetings. The plan must also include in-service, a mechanism to determine the effectiveness of the training and an administrative oversight component to ensure the consistent, compliant implementation of the procedures.**

**Documentation of Student Participation at IEP Meetings-** During the on-site visit, through record review and staff interviews, it was determined that while students may attend a portion of their IEP meetings, they did not always sign the IEP as a participant.

- **The school will revise its improvement plan to include procedures, in-service training, a mechanism to determine the effectiveness of the training and an administrative oversight component to ensure that students' participation at their IEP meetings are appropriately documented.**

**Communication to Sending District Regarding Missing IEP Components** – During the on-site visit, through record review and staff interviews it was determined that the school does not consistently communicate to sending districts when IEPs are missing components. Areas consistently missing include related service information, transition plans, including the identification of responsible agency, behavioral intervention plans, discussion of extended school year, participation level with general education and the inclusion of goals and objectives related to the core curriculum content standards.

- **The school will revise its improvement plan to include procedures to ensure that the school communicates with sending districts when IEPs components such as related service information, transition plans, including the identification of responsible agency, behavioral intervention plans, discussion of extended school year, participation level with general education and the inclusion of goals and objectives related to the core curriculum content standards are missing. The plan must include staff training and an administrative oversight component to ensure the consistent, compliant implementation of the procedures.**

**Informing Teachers/Providers of IEP Responsibilities** – During the on-site visit, through record review and staff interviews, it was determined that the school does not

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have a procedure in place to inform all teachers of their responsibilities related to the implementation of the students' IEP.

- **The school will revise its improvement plan to include procedures to ensure that all teachers and providers are informed as to their responsibilities related to the implementation of the IEP, including modifications, accommodations, and supports to the student. The plan will include in-service training, a mechanism to determine the effectiveness of the training and an administrative oversight component to ensure the consistent, compliant implementation of the procedures.**

### **Section VII: Programs and Services**

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

During self-assessment Strang School accurately identified themselves compliant in the areas of class size and age range, certifications, special classes implementing IEPs, home instruction, and dispensing medication/nursing services.

Areas of need were identified during the on-site visit regarding description of special class programs and instruction in the core curriculum content standards/core curriculum content standards for students with severe disabilities (CCCSs/CCCSSDs).

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

**Description of Special Class Programs** - During the on-site visit, through a review of records at the school and a review of records at the Salem County Office of Education, it was determined that the school does not submit program descriptions to the county office of education.

- **Within 45 days, the school will submit program descriptions to the county office for approval. In addition, the school will revise its improvement plan to include procedures to ensure that future program approval requests are submitted to the county supervisor of child study in a timely manner for county office review and approval. The plan must include an administrative oversight component to ensure consistent implementation of the procedures.**

**CCCSs/CCCSSDs** – During staff interviews, teachers routinely expressed that they do not have knowledge of CCCSs/CCCSSDs. As a result, classroom instruction is not related to the standards.

- **The school will revise its improvement plan to ensure that programs are instructed by teachers who are knowledgeable in CCCSs/CCCSSDs. The plan must include procedures, in-service training, a mechanism to determine the effectiveness of the training and an administrative oversight component to ensure the consistent, compliant implementation of the procedures.**

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**Section VIII: Student Records**

**Summary of Findings:**

During self-assessment Strang School accurately identified themselves compliant in the areas of daily attendance, tardiness, written notice of attendance, and student health records.

During the self-assessment process, Strang School identified concerns in the areas of return of records. **The receiving school's improvement plan is insufficient to address this area because it lacks procedures and an administrative oversight component to include consistent implementation of the procedures. The plan must be revised to include these components.**

Additional areas of need were identified during the on-site visit regarding access to records, access sheets, location of records, and absences.

**Areas of Need:**

**Access to Records-** During the on-site visit, through staff interviews and building visitation, it was determined that confidential student records were located in an unlocked cabinet in an unlocked room that was accessible to adults and students.

- **The school will revise its improvement plan to include procedures to ensure that records are appropriately secured and that only appropriately certified staff members with educational responsibility for a student have access to his/her records. The revisions must include staff training and an administrative oversight component to ensure consistent implementation of approved procedures regarding access to and security of records.**

**Access Sheets-** During the on-site visit, through a review of records, it was determined that student records did not consistently contain access sheets.

- **The school will revise its improvement plan to include procedures to ensure that access sheets are maintained in the student records. The plan must also include an administrative oversight component to ensure the consistent, compliant implementation of the procedures.**

**Location of Records –** During the on-site visit through staff interview and record review, it was determined that records maintained in a central file do not consistently have reference to the location where other records are maintained.

- **The school will revise its improvement plan to include procedures to ensure that the location of records is identified in the main student record. The plan must include an administrative oversight component to ensure the consistent, compliant implementation of the procedures.**

**Absences –** During on-site, through staff interviews and record review, it was determined that student absences of five days or more are not being reported in writing to sending districts.

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- **The school will revise its improvement plan to include procedures to ensure that student absences are communicated to the sending district. The plan must include an administrative oversight component to ensure the consistent, compliant implementation of the procedures.**



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**Summary**

The Strang School is commended for the comprehensive review conducted during the self-assessment process. As a result of that review the receiving school was able to identify areas of need and develop an improvement plan that with some revision will bring about systemic change. The receiving school is further commended for the many areas determined by the receiving school and verified by the Department of Education as compliant with federal and state statutes and regulations.

On-site special education monitoring was conducted in Strang School on May 6, 7, 8, 2003. The purpose of the monitoring visit was to verify Strang School's report of findings resulting from their self-assessment and to review Strang School's improvement plan.

Areas identified as consistently compliant by Strang School during self-assessment and verified during the on-site monitoring visit included the areas of staff development, annual reports, length of school day and year, physical education, maintenance of hearing aids, services at no cost to parents, observation of programs, private school dual employment, having an approved professional development plan, programs provided in approved facilities and certificates of occupancy and inspections, IEP accessibility, observation of proposed placement, statewide testing, progress reports, standard disciplinary procedures, procedures for time out rooms, restraints and aversives, removal of students, changes to program/placements, suspensions, interim alternative educational settings, termination of student, class size and age range, certifications, special classes, home instruction, and dispensing medication/nursing services, daily attendance, tardiness, written notice of attendance, and student health records.

During the self-assessment process, Strang School identified areas of need regarding fire drills, IEP meetings conducted annually, current IEP, including no delay in IEP implementation, and return of records.

The on-site visit identified additional areas of need within the various standards regarding policies, procedures and amendments, programs provided in nonsectarian settings, extended school year services, provision of services as per IEP, provision of speech and counseling, certified/licensed staff, employment/job descriptions of paraprofessionals, criminal history verification, IEP conducted with appropriate participants, signatures present on IEPs, communication to sending district regarding missing IEP components, inform teachers/providers of IEP responsibilities, description of special class programs, special class programs, CCCSs/CCCSSDs, access to records, access sheets, location of records, and absences.

Please be advised that several items require immediate action on the part of the school. Within forty-five days of receipt of the monitoring report, Strang School will revise and resubmit the improvement plan to the Office of Special Education Programs and to the county office of education to address those areas that require revisions.