

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

Receiving School: Mt. Carmel Guild Schools (Mt. Carmel Guild High School, Mt. Carmel Guild Middle School, Mt. Carmel Guild Academy and Mt. Carmel Guild Preschool)

County: Essex and Hudson

Monitoring Dates: December 5, 7, and 8, 2005

Monitoring Team: Gregory Margolis, Mark Lanzi, Ann Marie Bruder, Gladys Miller, Tammy Miller and Zola Mills

Background Information:

During the 2004–2005 school year, the Mt. Carmel Guild Schools (Mt. Carmel Guild High School, Mt. Carmel Guild Middle School, Mt. Carmel Guild Academy and Mt. Carmel Guild Preschool) conducted a self-assessment of policies, procedures, programs, services, and student outcomes. This self-assessment component of the monitoring process provided the Mt. Carmel Guild Schools 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. The Mt. Carmel Guild Schools developed improvement plans 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 Mt. Carmel Guild Schools' 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 the Mt. Carmel Guild Schools' special education administrators, building principals, special education teachers, parents and related service personnel.

Noncompliant items reflected in this report may result in nonallowable costs imposed by the Division of Finance in accordance with N.J.A.C. 6A:23-4.1 through 4.16.

School Strengths:

The **Mt. Carmel Guild High School** is commended for its strong commitment to providing students with a school environment that mirrors a typical high school setting

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including departmentalized classes, basketball league, clubs, field trips and dances. The school is also strongly committed to staff development through both traditional training opportunities and facilitating faculty visits to local high schools for observation of classrooms in their subject areas. To ensure that parents are able to attend IEP meetings, the school operates two vans that will transport a parent to and from school. These vehicles are also used by the school's transition specialist/job coach to assist students with pre-vocational work experiences.

The **Mt. Carmel Guild Middle School** should be commended for its emphasis on reading instruction including the use of specialized programs such as, Wilson Reading and Preventing Academic Failure. In addition, the school integrates strong counseling and consultation services through the employment of several school social workers. Students receive specific counseling on anger management techniques and conflict resolution and the social workers are all assigned specific days each week to assist with crisis management. The Mt. Carmel Guild Middle School offers a program for all eighth grade students which includes an introduction to their rights in special education and IEPs, films on transition/work related experiences focusing on long term goals and career exploration. Students are also involved in service learning through involvement in the Rotary Club and activities to assist veterans and senior citizens. The school also facilitates referrals to a variety of wrap-around service agencies including the UMDNJ Challenge Program, CAP of West Orange, and Care Management Organization of Hudson County.

The **Mt. Carmel Guild Academy** is commended for the provision of extensive supports and services that address students' behavior. The school employs multiple school social workers who provide individual and group counseling, classroom consultation and crisis management. Students have the ability to voluntarily request additional sessions with their assigned social worker through a "sign-in" board. One of the school social workers is assigned specifically to the school's "Problem Solving Room" in which students who demonstrate significant behavioral outbursts can be assigned to both address the behavior and related emotional issues and continue performing their academic work. As a means of facilitating continuity in behavior management, the school also clearly displays its standard behavior expectations for all students throughout the school.

The **Mt. Carmel Guild Preschool** offers a twelve month curriculum implemented for their students. This extensive curriculum incorporates a six week summer program. The school offers a full day preschool program for its students from 8:30 am – 2:00 pm daily. The Mt. Carmel Guild Preschool program also provides play therapy, anger management, social skills and instruction in daily living skills.

Areas Demonstrating Compliance With All Standards:

Discipline and **Student Records** were determined to be areas of compliance by all four of the Mt. Carmel Guild Schools during self-assessment and by the NJDOE during the on-site visit.

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Section I: General Provisions

Summary of Findings:

During self-assessment, the **Mt. Carmel Guild Schools** accurately identified themselves compliant in the areas regarding annual reports and amendments.

Mt. Carmel Guild High School

During self-assessment, the **Mt. Carmel Guild High School** accurately identified themselves compliant in the area regarding programs provided in nonsectarian settings.

During the self-assessment process, the **Mt. Carmel Guild High School** identified concerns in the areas regarding policies and procedures, staff development and parent training. The school's improvement plan is sufficient to address these areas of need. During the on-site visit, a review of records and staff interviews indicated that the receiving school has appropriately implemented specific activities to bring about correction in these areas.

Mt. Carmel Guild Middle School

During self-assessment, the **Mt. Carmel Guild Middle School** accurately identified themselves compliant in the area regarding staff development.

During the self-assessment process, the **Mt. Carmel Guild Middle School** identified concerns in the areas regarding policies and procedures and programs provided in nonsectarian settings. The school's improvement plan is sufficient to address these areas of need. During the on-site visit, through a review of records, staff interviews and a tour of the facility, it was determined that the receiving school has appropriately implemented specific activities to bring about correction in these areas.

Mt. Carmel Guild Academy

During self-assessment, the **Mt. Carmel Guild Academy** accurately identified themselves compliant in the areas regarding staff development and programs provided in nonsectarian settings.

Mt. Carmel Preschool

During self-assessment, the **Mt. Carmel Guild Preschool** accurately identified themselves compliant in the areas regarding policies and procedures, staff development, and programs provided in nonsectarian settings.

No additional areas of need were identified in this area during the on-site visit at the **Mount Carmel Guild Schools**.

Section II: Free, Appropriate Public Education (FAPE)

Summary of Findings:

During self-assessment, the **Mt. Carmel Guild Schools** accurately identified themselves compliant in the areas regarding length of school day and year, provision of physical

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education, services at no cost to parents, extended school year programs and services provided in accordance with IEPs and program open to observation by LEA and DOE.

Mt. Carmel Guild High School

During the self-assessment process, the **Mt. Carmel Guild High School** accurately identified themselves compliant in the areas regarding the provision of services in accordance with IEPs, provision of occupational therapy (OT), physical therapy (PT), speech-language therapy and counseling services as per IEP.

An area of need was identified during the on-site visit at the **Mt. Carmel Guild High School** in the area regarding policy and procedures for the maintenance of hearing aids.

Area of Need:

Policy and Procedures for the Maintenance of Hearing Aids – During the on-site visit, through interviews and a review of documentation of **Mt. Carmel Guild High School's** current policies and procedures, it was determined that the school does not have a policy and procedure for the maintenance of hearing aids.

- **The receiving school will develop a policy and procedures to ensure that hearing aids are functioning properly and will provide staff training when students who use hearing aids are enrolled in the school.**

Mt. Carmel Middle School

During the self-assessment process, the **Mt. Carmel Middle School** accurately identified themselves compliant in the areas regarding services provided in accordance with IEPs, provision of services as per IEP, provision of occupational therapy (OT), physical therapy (PT) services and counseling services as per IEP.

During the self-assessment process, the **Mt. Carmel Guild Middle School** identified concerns in the areas regarding provision of speech-language services as per IEP. The Mt. Carmel Guild Middle School's improvement plan is sufficient to address this area of need.

No additional areas of need were identified during the on-site visit at **Mt. Carmel Guild Middle School**.

Mt. Carmel Academy

During the self-assessment process, the **Mt. Carmel Academy** accurately identified themselves compliant in the areas regarding services provided in accordance with IEPs, provision of services as per IEP, provision of occupational therapy (OT), physical therapy (PT) and counseling services as per IEP.

During the self-assessment process, the **Mt. Carmel Academy** identified concerns in the areas regarding provision of speech-language services as per IEP. **The Mt. Carmel Guild Academy's improvement plan is insufficient to address this area of need. Through staff interviews it was determined that, although the school has hired two part-time speech therapists, they have not developed a plan to arrange for compensatory services for missed speech therapy sessions. The school's**

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improvement plan must be revised to address this area of need and include an administrative oversight component to ensure that students receive all missed sessions due to lack of staff.

No additional areas of need were identified during the on-site visit at **Mt. Carmel Academy**.

Mt. Carmel Guild Preschool

During the self-assessment process, the **Mt. Carmel Guild Preschool** identified concerns in the areas regarding provision of services provided in accordance with IEPs, provision of occupational therapy (OT), physical therapy (PT), speech-language therapy and counseling services as per IEP. **The receiving school's improvement plan is insufficient to address these areas of need because it lacks procedures, in-service training and an administrative oversight component to ensure that related services are provided in accordance with the IEP. The receiving school's improvement plan must be revised to include these components.**

An additional area of need was identified during the on-site visit at the **Mt. Carmel Guild Preschool** in the area regarding evaluation for related services.

Area of Need:

Evaluation for Related Services – During the on-site visit, through record reviews and staff interviews, it was determined that the **Mt. Carmel Guild Preschool's** occupational, physical and speech language specialists routinely perform formal evaluations and reevaluations and make recommendations for the provision of related services.

- **The school must revise its improvement plan to include procedures to ensure that when the school believes that a student requires an evaluation to initiate, terminate or modify related services, a referral must be made to the child study team of the sending district. The plan must include an administrative oversight component to ensure consistent implementation of the procedures.**

Section III: Staff Requirements

Summary of Findings:

During self-assessment, the **Mt. Carmel Guild Schools** accurately identified themselves compliant in the areas regarding private school dual employment, supervision of paraprofessionals, job descriptions of paraprofessionals maintained at county office and criminal history verification.

Mt. Carmel Guild Preschool

During the self-assessment process, the **Mt. Carmel Guild Preschool** identified concerns in the areas of certified/licensed staff, appropriate supervision of physical therapy assistants (PTA) and certified occupational therapy assistants (COTA) and having an approved professional development plan. The receiving school's improvement plan is sufficient to address these areas of need. During the on-site visit, a

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review of records and staff interviews indicated that the receiving school has appropriately implemented specific activities to bring about correction in these areas.

No additional areas of need were identified in this area during the on-site visit at the **Mount Carmel Guild Schools**.

Section IV: Facility Requirements

Summary of Findings:

During self-assessment, the **Mt. Carmel Guild Schools** accurately identified themselves compliant in the areas regarding certificates of occupancy and inspections and fire drills.

Mt. Carmel Guild High School

During the self-assessment process, the **Mt. Carmel Guild High School** identified concerns in the area of programs provided in approved facilities. The Mt. Carmel Guild High School's improvement plan is sufficient to refurbish an existing elevator and install a sink in the nurse's office.

No additional areas of need were identified during the on-site visit at the **Mount Carmel Guild Schools**.

Section V: Individualized Education Program/Annual Review

Summary of Findings:

During self-assessment, the **Mt. Carmel Guild Schools** accurately identified themselves compliant in the areas regarding IEP meeting conducted at least annually, IEP meeting conducted with required Mt. Carmel Guild School participants, IEP meeting conducted with students age 14 and older, signatures of participants present on IEPs, current IEP prior to service delivery, IEP accessibility to teachers and providers, informing teachers and providers of IEP responsibilities, timely implementation of IEPs, observation of proposed placement, statewide testing and informing parents of progress toward IEP goals and objectives.

Mt. Carmel Guild Preschool

During the self-assessment process, the **Mt. Carmel Guild Preschool** identified a concern in the area regarding communication to sending district regarding missing components. The receiving school's improvement plan is sufficient to address this area of need. During the on-site visit, a review of records and staff interviews indicated that the receiving school has appropriately implemented specific activities to bring about correction in these areas.

An additional area of need was identified during the on-site visit at **Mt. Carmel Guild Preschool** regarding the use of specialized techniques and equipment.

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Area of Need:

Use of Specialized Techniques and Equipment- During the on-site visit, through records reviews, staff interviews and classroom observations it was determined that the Mt. Carmel Guild Preschool utilizes specialized equipment for restraining students, such as rifton chairs and seat belts on chairs when the use of such equipment in not included in IEPs.

- **The school will revise its improvement plan to include procedures to ensure that the school does not make unilateral decisions regarding the students' program. If the school staff believes that a change in the program is appropriate, they must contact the sending district to request an IEP meeting. The plan must include an administrative oversight component to ensure consistent implementation of the procedures.**

Mt. Carmel Guild High School, Mt. Carmel Guild Middle School and Mt. Carmel Academy

An additional area of need was identified during the on-site monitoring visit at **Mt. Carmel Guild High School, Mt. Carmel Guild Middle School and Mt. Carmel Academy** regarding communication to sending districts regarding missing IEP components.

Area of Need:

Communication to Sending Districts Regarding Missing IEP Components- During the on-site visit, through a review of records and staff interviews it was determined that the schools do not have consistent procedures for communicating to sending districts when IEP components are missing. Areas missing from IEPs include, but are not limited to, goals and objectives for related services, documentation of the discussion of extended school year, documentation of the discussion of statewide assessments and documentation of the provision of related services.

- **The Mt. Carmel Guild High School, Middle School and Academy must revise their improvement plans to include procedures to ensure that the school communicates with sending districts when IEP components such as goals and objectives for related services, documentation of the discussion of extended school year, documentation of the discussion of statewide assessments, and documentation of the provision of related services are missing. The plan must include an administrative oversight component to ensure consistent implementation of the procedures**

Section VII: Programs and Services

Summary of Findings:

During self-assessment, the **Mt. Carmel Guild Schools** accurately identified themselves compliant in the areas regarding class size and age range, exceptions for class size and age range, special class program descriptions maintained at county office, certifications for specialized populations, special classes serving students with similar educational needs, teachers trained and instructing in Core Curriculum Content Standards (CCCSs),

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collaboration for home instruction, policies and procedures relating to school functions and services and medical exams for sport teams.

During the onsite visit, an additional area of need was identified regarding dispensing of medication and nursing services at all of the **Mt. Carmel Guild Schools**.

Area of Need:

Dispensing of Medication and Nursing Services- During the on-site visit, through staff interviews, it was determined that the **Mt. Carmel Guild Schools** do not have procedures in place to ensure that the full range of nursing services are available at each of the schools. The Mount Carmel Schools have one certified school nurse to provide the activities for all their schools without an approved regulatory equivalency or waiver. The schools' current procedures also describe a rotation for nurses at other programs to cover when the nurse is absent. This leaves a portion of the school day when students are in the building without a nurse on site. In addition, one of the schools has only a licensed practical nurse and not a registered nurse in the building.

- **The Mount Carmel Guild Schools must revise their improvement plan to ensure that the required full range of nursing services is provided in accordance with N.J.A.C. 6A:16-2.1(e).**

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Summary

On-site special education monitoring was conducted in the **Mt. Carmel Guild Schools** on December 5, 7, and 8, 2005. The purpose of the monitoring visit was to verify the **Mt. Carmel Guild Schools'** reports of findings resulting from their self-assessment and to review the **Mt. Carmel Guild Schools'** improvement plans.

Mt. Carmel Guild Schools

The **Mt. Carmel Guild Schools** are commended for the comprehensive review conducted during the self-assessment process. As a result of that review the receiving schools were able to identify areas of need and develop improvement plans that, with some revision, will bring about systemic change. The receiving schools are further commended for the many areas determined by the receiving schools and verified by the Department of Education as compliant with federal and state statutes and regulations.

Areas identified as consistently compliant by the **Mt. Carmel Guild Schools** during self-assessment and verified during the on-site monitoring visit included Discipline and Student Records.

The on-site visit also identified an additional area of need at all of the **Mt. Carmel Guild Schools** regarding nursing services and dispensing of medication.

Mt. Carmel Guild High School

During the self-assessment process, the **Mt. Carmel Guild High School** identified areas of need regarding policies and procedures, staff development, parent training and programs provided in approved facilities.

The on-site visit identified an additional area of need at **Mt. Carmel Guild High School** regarding policies and procedures for the maintenance of hearing aids.

Mt. Carmel Guild Middle School

During the self-assessment process, the **Mt. Carmel Guild Middle School** identified areas of need regarding programs provided in a nonsectarian setting, policies and procedures and provision of speech-language services as per IEP.

Mt. Carmel Guild Academy

During the self-assessment process, the **Mt. Carmel Guild Academy** identified areas of need regarding the provision of speech-language services as per IEP.

Mt. Carmel Guild High School, Middle School and Academy

The on-site visit identified an additional area of need at the **Mt. Carmel Guild High School, Middle School and Academy** concerning communication to sending districts regarding missing IEP components.

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Mt. Carmel Guild Preschool

During the self-assessment process, the **Mt. Carmel Guild Preschool** identified areas of need regarding provision of services provided in accordance with IEPs, provision of services as per IEP, provision of occupational therapy (OT), physical therapy (PT), speech-language therapy and provision of counseling services as per IEP, certified/licensed staff, appropriate supervision of physical therapy assistants (PTA) and certified occupational therapy assistants (COTA), having an approved professional development plan and communication to sending district regarding missing IEP components.

The on-site visit identified additional areas of need within the various standards at the **Mt. Carmel Guild Preschool** regarding evaluations for related services and the use of specialized equipment and techniques.

Within forty-five days of receipt of the monitoring report, the **Mt. Carmel Guild Schools** will revise and resubmit their improvement plans to the Essex and Hudson county offices of education and to the Office of Special Education Programs to address those areas that require revisions.