

**New Jersey Department of Education  
Special Education Passaic County ESC Monitoring**

**Receiving School:** Passaic County Educational Services Commission  
(Passaic County ESC)

**County:** Passaic

**Monitoring Dates:** Passaic County ESC- May 10-12, 2005  
Administrative Offices- May 10, 2005  
Passaic Prep-May 11, 2005  
Park School- May 11, 2005  
Skylands / Hilltop-May 12, 2005  
Memorial Hall-May 12, 2005

**Monitoring Team:** Diane Mari, Ann Marie Bruder, Zola Mills, Greg Margolis

**Background Information:**

During the 2003–2004 school year, the **Passaic County Educational Services Commission (Passaic County ESC)** conducted a self-assessment of policies, procedures, programs, services and student outcomes. This self-assessment component of the monitoring process provided the Passaic County ESC 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 **Passaic County ESC** 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 **Passaic County ESC** 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 Passaic County ESC's special education administrators, building principals, special education, parents, teachers and related service personnel.

**School Strengths:**

The **Passaic County ESC** has four special education programs. Each program is geared to a particular need and offers services specific to the population they serve.

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The **Skylands School** provides extensive sensory training as well transdisciplinary support services. The **Park School** offers programs for preschool disabled students and also houses general education kindergartens encouraging interaction with non-disabled peers. The students have access to an outside play area as well as community experiences. **Passaic Prep** utilizes a “therapeutic program structure” specifically designed to serve students with behavioral issues. Each student receives counseling on a regular basis and a mental health clinic is available when a situation requires intervention. **Memorial Hall** serves both special education students and students enrolled in an alternative program. This allows the special education students to take part in inclusion activities and classes on a regular basis. This school offers its students a variety of after school activities such as photography club, intramural sports and an interscholastic co-ed basketball league. **Memorial Hall** offers a strong transition program to help students achieve success after graduation.

### **Section I: General Provisions**

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

During self-assessment, the **Passaic County ESC** accurately identified themselves compliant in the areas regarding annual reports, amendments and programs provided in nonsectarian settings.

During the self-assessment process, the **Passaic County ESC** identified concerns in the areas regarding staff development and policies and procedures. The school's improvement plan is sufficient to address the area of staff development. During the on-site visit a review of records and staff interviews indicated that the **Passaic County ESC** has appropriately implemented specific activities for correction in this area. **The receiving school's improvement plan is insufficient to address the area of policies and procedures relating to suspension and termination of a student because it fails to include appropriate procedures that are in accordance with N.J.A.C. 6A:14. The plan must also include an administrative oversight component to bring about the required changes. The plan needs to be revised to include these components.**

An additional area of need was identified during the on-site visit at **Passaic County ESC** in the area of parent training.

### **Passaic County ESC**

#### **Area of Need:**

**Parent Training**– During the on-site visit, through staff interviews and a review of records it was determined that the **Passaic County ESC** does not consistently perform an annual needs assessment or provide parent training opportunities in the identified areas.

- **The Passaic County ESC will revise its improvement plan to include procedures to ensure that the all Passaic County ESC sites provide parent training opportunities. The plan must include an administrative oversight component to ensure consistent implementation of the procedures.**

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**Section II: Free, Appropriate Public Education (FAPE)**

**Summary of Findings:**

During self-assessment, the **Passaic County ESC** accurately identified themselves compliant in the areas regarding length of school day and year, services at no cost to parents, extended school year programs and services provided in accordance with IEPs, program open to observation by LEA and DOE, provision of services as per IEP, provision of occupational therapy (OT) and counseling services as per IEP.

An area of need was identified during the on-site visit at the **Passaic County ESC** in the area of maintenance of hearing aids.

**Passaic County ESC**

**Area of Need**

**Policy and Procedures for Maintenance of Hearing Aids-** During the on-site visit a review of records and staff interviews indicated that the school does not have a policy and procedures for the maintenance of hearing aids.

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

An area of need was identified during the on-site visit at **Passaic Prep** regarding the provision of physical therapy (PT) services.

**Passaic Prep**

**Area of Need**

**Provision of Physical Therapy (PT)**– During the on-site visit at **Passaic Prep**, through record review and staff interviews it was determined that the program’s physical therapist recently resigned and there was no documentation indicating that the school has followed proper procedures to ensure that the students’ IEPs are being met.

- **The school will revise its improvement plan to include procedures to ensure that students consistently receive related services as indicated in IEPs. The plan must address how districts will be notified when related services are temporarily interrupted, including proposals for provision of compensatory services. The plan must include an administrative oversight component to ensure consistent provision of related services as required by student IEPs.**

An area of need was found during the on-site visit at **Memorial Hall**, regarding the provision of speech language services as per IEP.

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**Memorial Hall**

**Area of Need**

**Provision of Speech Language Services as Per IEP**– During the on-site visit at **Memorial Hall**, through record review and staff interviews it was determined that while the school does not employ a speech language therapist, many students' IEPs reflected the provision of speech language services.

- **The school will revise its improvement plan to ensure that sending districts are advised that the program does not provide speech language therapy and that if a student is required to receive this service, that the school must ensure that the IEP specifies how the sending district will obtain these services. The improvement plan must also ensure that the receiving school reviews IEPs for the requirement of speech language therapy and communicates with the sending district when provisions for speech services are required by the sending district. The plan must include an administrative oversight component to bring about the required changes.**

An area of need was identified during the on site visit at **Skylands/Hilltop** regarding the provision of adaptive physical education as per students' IEPs.

**Skylands/Hilltop**

**Area of Need:**

**Adaptive Physical Education as Per IEP**– During the on-site visit at **Skylands/Hilltop**, through record review and staff interviews it was determined that several students' IEPs included a provision for adaptive physical education. The school however, does not employ a physical education teacher and the students IEPs did not include goals and objectives to address adaptive physical education.

- **The school will revise its improvement plan to include procedures to ensure that the school provides a minimum of 150 minutes of adaptive physical education, health and safety for those students whose IEPs so specify. The plan must include an administrative oversight component to ensure that IEPs are implemented as written.**

**Section III: Staff Requirements**

**Summary of Findings:**

During self-assessment, the **Passaic County ESC** accurately identified themselves compliant in the areas regarding, appropriate supervision of physical therapy assistants (PTA) and certified occupational therapy assistants (COTA), supervision of paraprofessionals, job descriptions of paraprofessionals maintained at county office and having an approved professional development plan.

Additional areas of need were identified during the on-site visit at **Passaic County ESC** regarding certified/licensed staff and criminal history verification.

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**Certified/Licensed Staff** – During the on-site visit at **Passaic County ESC** through staff interviews it was determined that the commission allows non-certified classroom assistants to supervise student instruction in the classroom during the teachers' lunch period.

- **The Passaic County ESC must revise its improvement to include procedures and an administrative oversight component to ensure that all students' classroom instruction is supervised by a certified staff member at all times. In addition, the receiving school must revise its improvement plan to include procedures and administrative oversight to ensure that all staff members have the proper credentials as indicated in the job descriptions approved by the county office of education.**

**Criminal History Verification** – During the on-site visit at **Passaic County ESC** a review of records determined that the commission employs staff members who have not received criminal history clearances specific to their current employment, from the New Jersey Department of Education.

- **The school will immediately submit requests for emergent hiring through the County Superintendent's Office for all staff members in noncompliance and follow up with the criminal history review office for staff whose fingerprint data have not been returned in a timely manner. In addition, the school must revise their improvement plan to include procedures, and an administrative oversight component to ensure that all staff members obtain criminal history clearance prior to starting employment at the commission.**

An area of need regarding an unrecognized job title was identified during the visit at **Skylands/Hilltop** pertaining to the school's behaviorist.

### **Skylands/Hilltop**

#### **Area of Need**

**Unrecognized Job Title-** During the on-site visit at **Skylands/Hilltop** a review of records and staff interviews determined that the program employs a full-time behaviorist which is an unrecognized job title without Department of Education certification. Interviews with staff indicated that the behaviorist is involved with the direct development of behavior management plans, has access to student records, provides on-going consultation to classroom teachers and has direct contact with parents. However, according to the school's employment records, this individual is employed as a special education instructional assistant.

- **Within 45 days the receiving school will employ only staff members who have recognized job titles unless they obtain prior approval from the county office of education. In addition, the school will revise its improvement plan to include procedures to ensure that all staff members employed by the school have recognized job titles. The plan must include an administrative oversight component to ensure the consistent implementation of the procedures.**

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**Section IV: Facility Requirements**

**Summary of Findings:**

During self-assessment, the **Passaic County ESC** accurately identified themselves compliant in the areas regarding programs provided in approved facilities, certificates of occupancy and fire drills.

An area of need was identified regarding the boiler inspection at **Park School**.

**Park School**

**Area of Need:**

**Boiler Inspection-** During the on-site visit at **Park School** through a review of records conducted during the monitoring process it was determined that the boiler had not been inspected since June 16, 2003.

- **The receiving school must immediately arrange to have the boiler inspected with documentation of the inspection provided to the county office within 10 days of receipt of the report. In addition, the receiving school must revise its improvement plan to include procedures to ensure the boiler is inspected on an annual basis. The plan must include an administrative oversight component to ensure the consistent implementation of the procedures.**

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

**Summary of Findings:**

During self-assessment, the **Passaic County ESC** accurately identified themselves compliant in the areas regarding IEP conducted with required receiving school participants, IEP conducted with students age 14 and older, as appropriate, 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, implementation of IEP components and informing parents of progress toward goals and objectives.

During the self-assessment process, the **Passaic County ESC** identified concerns in the areas regarding IEP meeting conducted at least annually and signatures of participants present on IEPs. The receiving 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.

An additional area of need was identified at the **Passaic County ESC** regarding communication to sending district regarding missing IEP components.

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**Passaic County ESC**

**Area of Need:**

**Communication to Sending District Regarding Missing IEP Components**– During the on-site visit at **Passaic County ESC** staff interviews and record reviews indicated that IEPs are missing components. Although several of the programs indicated that they had developed procedures to address this area, record reviews indicated that there was very little or inconsistent documentation of attempts to obtain missing components. Examples of missing components include goals and objectives for adaptive physical education.

- **The Passaic County ESC will revise its improvement plan to include procedures, to ensure that the school communicates with sending districts when IEP components such as goals and objectives for adaptive physical education are missing. The plan must include staff training and an administrative oversight component to ensure that all students' IEPs contain the required components.**

An additional area of need was identified during the on-site visit at the **Park School** regarding instructional strategies, special materials and behavior intervention plans.

**Park School**

**Area of Need**

**Instructional Strategies, Special Materials, and Behavior Plans**– During the on-site visit at the **Park School** it was determined through staff interviews and record reviews that the school frequently integrates specialized strategies such as brushing, individualized behavior plans and restrictive equipment (e.g., Rifton chairs) without discussion at an IEP meeting or documentation in the IEPs.

- **The school will revise its improvement plan to include procedures to ensure that the school does not make unilateral decisions regarding specialized strategies, equipment and behavior plans. Only the IEP team can alter the student's 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.**

**Section VI: Discipline**

**Summary of Finding:**

During self-assessment, the **Passaic County ESC** accurately identified themselves compliant in the areas regarding procedures for time out rooms, restraints and aversives, removal of student pending mediation and due process, changes to program/placement pending mediation and due process, notification to sending districts regarding suspensions and removal of student to interim alternative educational setting.

During the self-assessment process, the **Passaic County ESC** identified concerns in the areas regarding standard disciplinary procedures and procedures for termination of

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student placement. **The receiving school's improvement plans are insufficient to address standard disciplinary procedures and termination of a student because they lack procedures and an administrative oversight component to bring about the required changes. The plan needs to be revised to include these components.**

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

**Section VII: Programs and Services**

**Summary of Findings:**

During self-assessment, the **Passaic County ESC** 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, special classes serving students with similar educational needs, teachers trained and instructing in CCCSs, collaboration for home instruction, dispensing medication, nursing services, policies and procedures relating to school functions and services and medical exams for sport teams.

During the on-site monitoring an additional area of need was identified in the area of nursing services and facilities at **Memorial Hall, Passaic Prep, Skylands/Hilltop**.

**Memorial Hall, Passaic Prep, Skylands/Hilltop**

**Areas of Need:**

**Nursing Services and Facilities** – During the on-site visit at **Memorial Hall, Passaic Prep and Skylands/Hilltop** staff interviews, record review and tour of the facilities indicated that the program sites do not comply with the facility requirements specified in N.J.A.C. 6A:26-6.2 and the employment of a school certified nurse specified by N.J.A.C. 6A:16-2.1(e). **Memorial Hall** does not have a nursing facility within the school and the employment of a registered nurse is limited to 1 hour each morning for medication administration. The nurses' station at **Passaic Prep** does not have access to running water and lavatory facilities. The **Skylands/Hilltop** school employs a full-time non-school certified registered nurse who is housed in the classroom setting and without a separate nursing station. In addition, this nurse facilitates the mandatory staff trainings required by N.J.A.C. 6A:16-2.1, writes individualized student nursing plans and transcribes doctors' medication orders.

- **The Passaic County ESC must revise its improvement plan for the Memorial Hall, Passaic Prep, Skylands/Hilltop programs to include procedures to ensure that the required full range of nursing services is provided by employing a full time certified school nurse for each location. The school may request a waiver of full time status though the Regulatory Equivalency Waiver process in accordance with N.J.A.C. 6A:5-1.1. In addition, the school will revise its improvement plan to include activities to identify an appropriate space for the provision of nursing services as required by N.J.A.C. 6A:26-6.2. Prior written approval for use of the new space must be obtained from the county office.**



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**Section VIII: Student Records**

**Summary of Findings:**

During self-assessment, the **Passaic County ESC** accurately identified themselves compliant in the areas regarding conformance to pupil record code, return of records upon termination of student placement, access to records is limited to authorized persons, access sheets, location of other records specified in central file, daily attendance available to LEAs, written notice of placement to county office, and maintenance of student health records.

During the self-assessment process, the **Passaic County ESC** identified concerns in the areas regarding written communication to LEAs regarding five days of tardiness/absences. The receiving 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.

No additional areas of need were identified during the on-site visit at **Passaic County ESC**.

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## Summary

On-site special education monitoring was conducted in the **Passaic County ESC** on May 10-12. The purpose of the monitoring visit was to verify the **Passaic County ESC's** report of findings resulting from their self-assessment and to review the **Passaic County ESC's** improvement plan.

The receiving 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.

Areas identified as consistently compliant by the **Passaic County ESC** during self-assessment and verified during the on-site monitoring visit included areas regarding annual reports, amendments, programs provided in nonsectarian settings, length of school day and year, provision of physical education, services at no cost to parents, extended school year programs and services provided in accordance with IEPs, program open to observation by LEA and DOE, provision of services as per IEP, provision of occupational therapy (OT) and counseling services as per IEP, appropriate supervision of physical therapy assistants (PTA) and certified occupational therapy assistants (COTA), supervision of paraprofessionals, job descriptions of paraprofessionals maintained at county office, and having an approved professional development plan, programs provided in approved facilities, certificates of occupancy, and fire drills, IEP conducted with required receiving school participants, IEP conducted with students age 14 and older, as appropriate, 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, implementation of IEP components, and informing parents of progress toward goals and objectives, procedures for time out rooms, restraints and aversives, removal of student pending mediation and due process, changes to program/placement pending mediation and due process, notification to sending districts regarding suspensions, and removal of student to interim alternative educational setting, class size and age range, exceptions for class size and age range, special class program descriptions maintained at county office, special classes serving students with similar educational needs, teachers trained and instructing in CCCSs, collaboration for home instruction, dispensing medication, policies and procedures relating to school functions and services, and medical exams for sport teams, conformance to pupil record code, return of records upon termination, access to records is limited to authorized persons, access sheets, location of other records specified in central file, daily attendance available to LEAs, written notice of placement to county office and maintenance of student health records.

During the self-assessment process, the **Passaic County ESC** identified areas of need regarding policies and procedures and staff development. The receiving school's improvement plan is insufficient to address policies and procedures regarding suspension and termination of a student, IEP meeting conducted at least annually and signatures of participants present on IEPs, standard disciplinary procedures and procedures for termination of student placement.

The on-site visit identified additional areas of need within the various standards at **Passaic County ESC** regarding parent training, policies and procedures for

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maintenance of hearing aids, certified/licensed staff, criminal history verification, communication to sending districts regarding missing IEP components

The on-site visit identified additional areas of need within the various standards at **Passaic Prep** regarding provision of physical therapy (PT) services and nursing services/facilities.

The on-site visit identified additional areas of need within the various standards at **Park School** regarding current boiler inspection, instructional strategies, special materials and behavior intervention plans.

The on-site visit identified additional areas of need within the various standards at **Memorial Hall** regarding the provision of speech language services as per IEP and nursing services/facilities.

The on-site visit identified additional areas of need within the various standards at **Skylands/Hilltop** regarding the provision of adaptive physical education as per students' IEPs, unrecognized job title pertaining to the school's behaviorist and nursing services/facilities.

Within forty-five days of receipt of the monitoring report, the **Passaic County ESC** will revise and resubmit the improvement plan to the county office of education and to the Office of Special Education Programs to address those areas that require revisions.