

HADDONFIELD SCHOOL DISTRICT
OFFICE OF SPECIAL EDUCATION

Summary of 2019 Audit Recommendations

Review of Child Find Procedures and Eligibility Rates						
	Page Ref.	Recommendation	Status			
			Completed	In Process/ ongoing	Not Yet	
<u>Overuse of Multiply Disabled Eligibility</u>						
1	11	CST staff should be retrained in eligibility determinations specifically focusing on eligibility criteria for Multiply Disabled. The Director of Special Education should review evaluations for students identified as Multiply Disabled to ensure consistency of the application of the criteria for this disability category.	CST Case Managers were retrained on 5/24/19 and updated guidance on MD classification developed and included in new Special Education Procedures Manual.	X		
2	11	The district should consider hiring experienced staff that are formally trained and certified as school psychologists when adding CST staff or filling CST vacancies.	Within the last 7 months, 3 new CST members have been hired: Dr. Kristen Leren, School Psychologist, was hired in January of 2019 to replace the retiring SP Dr. Jerry Hellman. Dr. Carmen Henderson, LDTC, was hired in June of 2019 to replace the retiring LDTC Ms. Jan Zubak Ms. Alice Lee, School Psychologist, was hired in July 2019 as the newly created 7th CST position.	X		

Overidentification of Articulation Disorders in Preschool & Lack of Consistency Across Speech Evaluations

3	12	A developmental screening instrument or a comprehensive developmental inventory should be completed as part of all initial evaluations to determine the eligibility of preschool aged children. This would accurately capture a delay in communication development if present.	Assessment and updated eligibility criteria established and implemented February 2019, including an assessment and eligibility flowchart. If a preschool child with significantly delayed articulation/communication only needs speech therapy as a related service, and not special education (eg curricular modifications, specialized instructional strategies, supplemental aids, that child would not qualify under preschool child with a disability as all requirements for eligibility in State regulations were not met.	X		
4	12	The Director of Special Education should work with district speech and language pathologists to establish a consistent and comprehensive assessment battery that establishes a minimal standard of evaluation components.		X		

Limited Discipline-Specific Training

				Completed	In Process/ ongoing	Not Yet
5	13	The district would benefit from discipline-specific supervision, consultation, and professional development. The professional development should focus on current trends in the field, relevant district needs, including those identified in this report, as well as the observed strengths and weaknesses of the professional staff.	For the first time, a member of the related service team has been added to the district's Local Professional Development Committee to help plan and recommended discipline-specific PD for related services faculty. Within the past 6 months, 2 speech therapists have been PROMPT trained, 2 OTs and 1 PT have been trained in the latest school based therapies, and CST staff have attended training from the NJ Dyslexia Association. Consideration is currently being given in hiring consultants		X	

			or establishing department facilitators.			
6	13	The CST staff would also benefit from additional time to collaborate, taking advantage of each other's areas of expertise regarding student assessment data and eligibility determinations.	CST Department meetings have increased in number from 1 to 2 per month. The additional meetings will allow for staffing meetings, where current referrals and cases can be reviewed as a group for consultation and feedback. Moreover, a new Dyslexia assessment protocol is being developed, as well as updated eligibility criteria (both expected to be completed by Nov. 2019).	X		
<u>Implementation of Evidence-Based Pre-Referral Intervention (I & RS)</u>				Completed	In Process/ ongoing	Not Yet
7	14	The district would benefit from a more formal structure to the I & RS process. Ongoing analysis of interventions used, the effectiveness of these interventions, numbers of students who are ultimately referred for further evaluation, and the numbers of students who are ultimately found eligible for special education services will inform both general education and special education practices in the district and help to foster shared ownership among the general education and special education staff members.	CST has developed a new Referral Form to be implemented in September 2019 to more accurately track CST referrals from I and RS. Enhanced pre-referral training is being coordinated to provide Intervention and Referral Services building-based teams with specific concepts, tools, techniques, and practice in assessing and addressing students' learning, behavior and health difficulties, consistent with the New Jersey Department of Education's Tiered System of Supports.		X	
8	14	Building administrators and representatives from guidance, special education, and general education should meet quarterly to analyze data, review cases and	Principals, counselors, special and general education teachers meet monthly to review I and RS data and monitor plans	X		

		progress, and to review the I & RS process for possible adjustment or revision.	and new referrals. Additionally, Teacher Leaders have been newly established and starting in September 2019, will have release time on a quarterly basis to review and analyze data to help guide and inform instruction.			
9	14	The district should expand evidence-based pre-referral interventions for students exhibiting difficulties not related to reading.	Enhanced pre-referral training is being coordinated to provide Intervention and Referral Services building-based teams with specific concepts, tools, techniques, and practice in assessing and addressing students' learning, behavior and health difficulties, consistent with the New Jersey Department of Education's Tiered System of Supports.		X	
10	14	The district should also expand its use of universal screening tools to include additional areas such as, writing mechanics, and behavioral and emotional development, as early intervention is vital to student success and there are costly outcomes associated with delaying intervention.			X	
IEP Development, Management, and Progress Monitoring						
<u>IEP Meeting Management</u>				Completed	In Process/ ongoing	Not Yet
11	15	While parent communication, collaboration and training are all critical components of successful student programming, the district should consider ways to maintain strong parent communications while simultaneously improving staff utilization and efficiency. Recommendations are as follows:				
11a	15	Staggering the date of the IEP meeting so that instructional time is maximized.	All annual reviews are scheduled between March and June and average 3-4 meetings per week for each Case Manager.	X		

11b	15	Block one hour for each meeting. There will be some families and situations that call for more time. However, one hour is appropriate for most IEP meetings.	This expectation was successfully established during spring 2019 Annual Reviews.	X		
11c	15	Train the staff in running efficient meetings. There is an art to running an effective meeting. This includes having a strong structure. Stating the time frame at the start of the meeting, having an agenda, tabling discussions that are off topic or circular, limiting the social conversation while the whole group is present, not reading the document out loud to the team are some examples that support building this structure.	Standard AR agendas were established and implemented during spring 2019 Annual Reviews. Meeting expectations were also included in the newly developed Special Education procedures manual. This will continue to be emphasized. Parents were also provided training in maximizing their participation in IEP meetings.		X	
11d	15	Sending a draft IEP document for parent review in advance of the scheduled meeting is good practice to reduce meeting time.	Draft of partial IEPs were sent home prior to meetings beginning in March 2019.	X		
11e	16	Not everyone needs to attend in-person or stay for the entire meeting.	Upon completion of a members respective portion, the individual and/or the Case Manager request parental permission to be dismissed from the meeting, where feasible. Moreover, we have started requested exempted particiaton from meetings where practical.	X		
11f	16	Use phone and video conferencing to participate remotely and to reduce travel time for related service staff.	This is currently in practice, when feasible.	X		

11g	16	While a parent is entitled to ask for an IEP meeting at any time, the district should attempt to limit the annual reviews to once per year, as appropriate.	IEP review meetings as IEP mandates have been significantly reduced and phased out where currently written, where possible.	X		
<u>Transition Between Buildings and Grades</u>				Completed	In Process/ ongoing	Not Yet
12	17	In addition to the existing procedure, it would be beneficial to have meetings or collaboration time between past and current providers of service. This may be practically hard to accomplish given limited staff availability and collaboration time.	Transition meetings between staff and CST for grade took place in spring 2019 for grades 5 to 6 and grades 8 to 9. This included observations and student centered discussions. We have also assigned the newly created CST position to case manage the majority of IEPs in grades 8 and 9 to further assist with the transition from middle to high school.	X		
13	17	The compliance date for completing document reviews should be moved to the first day of the school calendar.	This procedure has been updated to require IEP review by the end of the first week of school.		X	
14	17	Paraprofessional staff should be given an opportunity to provide feedback regarding changes in their assignment. Staff should have access to relevant educational records in order to understand and implement the services and supports as designed.	Building principals conduct evaluation meetings with all paraprofessional staff before the end of the school year. Potential changes in assignment that are known at the time are shared with the staff member. Paraprofessionals are entitled to access of IEPs for the student they support and this has been clarified in written procedure and training modules.	X		

15	17	Paraprofessional staff should receive training on the intervention strategies for the students they are assigned to support.	All EAs receive building based training at the start of the school year. Special education teachers will review and turnkey programs and supports for students they are assigned to support. Additionally, online PD will be provided to all special education paraprofessional.	X		
Review of Continuum of Special Education Programs and Services						
<u>Co-Teaching</u>				Completed	In Process/ ongoing	Not Yet
16	19	The district should consider implementing an itinerant or consultative model starting at the high school level.	Beginning this fall at HMHS, Learning Labs have been established, replacing co-teaching in grades 10-12 History classes. The Humanities Learning Lab will afford pre and re teaching to occur for these students. The Humanities Learning Lab will also support students in the co-taught area of English, grades 10-12, and Mathematics Learning Labs have also been established. A Co-Teaching handbook and evaluation tool has been developed and will be implemented in fall 2019.		X	
<u>Supplemental Reading Instruction- Wilson Reading System</u>				Completed	In Process	Not Yet
17	20	Administer the decoding section of the WIST for students who perform at or below the 35th percentile rank on the encoding section of the assessment.	All students that score between the 15th and 50th percentiles are administered the decoding section of the WIST.	X		

18	20	The staff should receive coaching support from the Wilson trainer on parts 7 & 8 of the lesson plan, the spelling block.	This training was provided by the district's Wilson Certified trainer on June 12, 2019.	X		
<u>Early Childhood Learning Center (ECLC)</u>				Completed	In Process/ ongoing	Not Yet
19	21	The roles and responsibilities of the district and contracted instructional and behavioral staff should be clarified.	Multiple meetings were held with the director and the leadership of Brett DiNovi and Associates. Roles and responsibilities were clarified, and a turn-key training plan was implemented in summer 2019 to build greater internal capacity in this area.	X		
20	21	The roles and responsibilities of the of the 1:1 paraprofessionals should be clarified.	Roles and responsibilities for 1:1 and classroom assistants have been developed in procedure and included in the paraprofessional training.	X		
21	21	Regular observation by both the contracted clinical supervisor and district administration (ex. Principal and Director of Special Education) should occur to ensure expectations of roles and responsibilities are being met.	This is ongoing.	X		
22	21	The students' IEPs should be the sole source of documentation that directs both the contracted and Haddonfield School District staff. The district should capture the behavioral services provided as part of their offer of FAPE.	Student behavior plans are no longer referenced as a document outside of the IEP. The formal plan is now included in the IEP.	X		
<u>Intensive Service Preschool</u>				Completed	In Process	Not Yet

23	23	The roles and responsibilities of the district and contracted instructional and behavioral staff should be clarified.	Multiple meetings were held with the director and the leadership of Brett DiNovi and Associates. Roles and responsibilities were clarified, and a turn-key training plan was implemented in summer 2019 to build greater internal capacity in this area.	X		
24	23	Regular observation by both the contracted clinical supervisor and district administration (ex. Principal and Director of Special Education) should occur to ensure expectations of roles and responsibilities are being met.	This is ongoing.	X		
25	23	The students' IEPs should be the sole source of documentation that directs both the contracted and Haddonfield School District staff. The district should capture the behavioral services provided as part of their offer of FAPE.	Student behavior plans are no longer referenced as a document outside of the IEP. The formal plan is not included in the IEP.	X		
<u>Transition Planning</u>				Completed	In Process	Not Yet
26	25	Provide the staff responsible for completing and implementing IEPs at the secondary level with professional development in writing post-secondary transition plans that includes all of the required components.	This goal and training will be included in all secondary Child Study Team members 2019-20 Professional Improvement Plans.	X		
27	25	The district should include more comprehensive assessments that inform transition plans. These assessments should include, as appropriate, career and college exploration, functional vocational evaluation, assessment of adaptive living skills, skills assessment, as well as an assessment of the likelihood that the student		X		

		is able to access these goals given their individual strengths and needs.				
Review of Special Education Department Procedures				Completed	In Process	Not Yet
28	27	The district would benefit from uniform, written procedures that detail necessary activities, roles and responsibilities, accessible to all staff members through a shared drive.	This document has been created and currently in draft format. This document is anticipated to be completed and submitted for BOE approval by December 2019. This will include a Dyslexia testing protocol and a new Eligibility Criteria Protocol.	X		
Review of Special Education Litigation				Completed	In Process	Not Yet
29	28	The district administration should hold regularly scheduled meetings with their legal counsel. These meetings should occur monthly and should include relevant members of the school team. As previously stated, these meetings should proactively look at common themes in past litigation, as it relates to current programming or to review and effectively manage potential or pending litigation	These meetings are under consideration and have not yet been formally implemented			X
30	28	The district should expect recommendations from their legal counsel regarding the legal aspects of programming.	This continues to happen, as needed.	X		
Review of Special Education Department Budget				Completed	In Process/ ongoing	Not Yet

31	30	Given the total costs of services, the Haddonfield School District should place the paraprofessional support and behavioral consultation services out to Request for Proposal (RFP). This will allow the district to better negotiate the quality and cost of services.	RFP were developed and advertised in the spring of 2019 for the following services: Behavioral consultation, Assistive Technology, Psychiatric Evaluations, Audiological Consultation.	X		
32	30	Consider contracting with more than one agency for behavioral consultation and paraprofessional support in order to avoid any potential conflicts of interest.	BDA developed the successful RFP that was approved by the BOE in spring 2019. Other agencies used during the previous school year include Deveroux and Kingsway.	X		
33	30	Given the concerns stated in the sections addressing Intensive Service Preschool and the ECLC, expectations should be established with contracted behavioral consultation providers to build capacity within district staff and eliminate or reduce the need for contracted services over time. Data related to the amount, type and cost of services should be provided by the contracted providers and reviewed on a quarterly basis.	Multiple meetings were held with the director and the leadership of Brett DiNovi and Associates. Roles and responsibilities were clarified, and a turn-key training plan was implemented in summer 2019 to build greater internal capacity in this area. Detailed monthly statements are provided and reviewed.	X		
34	30	Have legal counsel review contracts for purchased professional services.	This is a part of current practice.	X		
35	30	Given the overall budgetary restrictions as well as the stated areas of improvement described in the co-teaching section of this report with regard to staff utilization coupled with the total number of district and contracted paraprofessional staff, a comprehensive time study should be conducted to analyze and maximize staff operation.	A Co-Teaching handbook and evaluation tool has been developed and will be implemented in fall 2019.		X	
36	30	The district should also evaluate the costs and the associated benefits of contracting with private providers	This recommendation has been reviewed in terms of meaningful progress made	X		

		to implement Relationship Development Intervention (RDI) home programming to families as part of their FAPE offer and to satisfy the parent training component of the IDEA. RDI does not meet criteria as an evidence based intervention.	toward IEP goals. Any programs or methodologies not yielding positive data driven outcomes will be discontinued.			
37	30	As a matter of practice, the district administrative staff should evaluate stated staff inefficiencies, such as: access to parking for itinerant staff, inadequate technology available to special education staff, etc.	All special education teachers and related staff faculty in PS-12 have either been issued a personal Chromebook, or have easy access to a device. All Child Study Team Members have been issued PC Laptops, and all of the School Psychologists have been issued 2 iPads for student testing. District SLP's and Case Managers were previously issued iPads.	X		
38	31	As previously mentioned, the majority of special education staff are highly mobile and thus should be assigned individual laptops. Chromebooks could be an inexpensive, durable, and low-maintenance solution as long as the district infrastructure can support them and the applications required by the special education staff are all browser-based. If not, the district should purchase the type of laptops that can be best supported by the district technology staff.		X		
39	31	As previously mentioned, it is recommended that an additional 1.0 FTE CST member be added to the district budget. An additional CST member would bring the average caseload to 60 - 65 students. While still a full caseload, this is a more manageable number and will allow the CST members to provide the quality of care and expertise expected within the district.	A 7th CST member, a School Psychologist, was hired in July of 2019. Caseloads now average 59 as of 8/22/2019.	X		