

FINAL REPORT OF RANDOM MONITORING OF
EXCEPTIONAL STUDENT EDUCATION PROGRAMS IN

BRADFORD COUNTY

MAY 20 - 23, 2002



FLORIDA DEPARTMENT OF EDUCATION
BUREAU OF INSTRUCTIONAL SUPPORT AND COMMUNITY SERVICES

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May 30, 2003

Mr. Robert Patterson, Superintendent
Bradford County School District
501 W. Washington Street
Starke, Florida 32091-2610

Dear Superintendent Paterson:

We are pleased to provide you with the Final Report of Random Monitoring of Exceptional Student Education Programs in Bradford County. The report from our visit on May 20 - 23, 2002, includes the system improvement plan proposed by your staff.

An update of outcomes achieved and/or a summary of related activities, as identified in your district's system improvement plan, must be submitted by June 30 and December 30 of each school year for the next two years, unless otherwise noted on the improvement plan.

If my staff can be of any assistance as you continue to implement the system improvement plan, please contact Eileen L. Amy, ESE Program Administration and Quality Assurance Administrator. Mrs. Amy may be reached at 850/245-0476, or via electronic mail at Eileen.Amy@fldoe.org.

Thank you for your continuing commitment to improve services for exceptional education students in Bradford County.

Sincerely,

A handwritten signature in black ink that reads "Shan Goff".

Shan Goff, Chief
Bureau of Instructional Support and Community Services

Enclosure

cc: Pam Whittle, School Board Chairman
Members of the School Board
Phyllis Rosier, School Board Attorney
School Principals
Ulysses Woods, ESE Director
Jim Warford, Chancellor

SHAN GOFF

Chief

Bureau of Instructional Support and Community Services

Bradford County Final Monitoring Report
Table of Contents

Executive Summary	1
Monitoring Process	5
Authority	5
Method	5
Random Monitoring.....	5
District Selection.....	5
Off-Site Monitoring Activities.....	6
Parent Surveys	6
Reviews of District Forms and Special Categories Records	6
On-Site Monitoring Activities	6
Reporting Process	7
Exit Conference	7
Preliminary Report.....	7
Final Report	7
Background.....	9
Demographic Information.....	9
Reporting of Information	11
Sources of Information	11
Parent Surveys, Individual Interviews, Case Studies, and Classroom Visits	12
General Supervision.....	12
Assessment.....	13
Behavior/Discipline	14
Curriculum and Instruction.....	16
Least Restrictive Environment.....	17
Post-School Transition.....	18
Pre-K, Transition from Part C to Part B Programs	19
Parent Involvement	19
Gifted	20
Student Records and District Forms Reviews	22
Student Record Reviews: Students with Disabilities.....	22
Student Record Reviews: Gifted.....	24
District Forms Review	25
Special Category Records Reviews	25
Summary	27
System Improvement Plan	29
Appendices.....	38
Appendix A: Survey Responses.....	39
Appendix B: ESE Monitoring Team Members	45
Appendix C: Glossary of Acronyms.....	49
Appendix D: Forms Review	53

**Bradford County School District
Random Monitoring Visit
May 20-23, 2002**

Executive Summary

During the week of May 20-23, 2002, the Florida Department of Education, Bureau of Instructional Support and Community Services, conducted an on-site review of the exceptional student education programs in Bradford County Public Schools. The purpose of the random monitoring visit was to ensure the district's compliance with federal and state laws, rules, and regulations regarding exceptional student education programs, as well as to assess the district's implementation of procedures related to requirements. Additionally, the random monitoring process is intended to assist districts in the development of improvement plans related to compliance and implementation of exceptional student education programs designed to promote student educational outcomes. The results of the monitoring process are reported under ten categories or related areas that are considered to impact or contribute to procedural compliance and student progress.

Summaries of Findings

Parent Surveys, Individual Interviews, Case Studies, and Classroom Visits

General Supervision

The lack of district or school-wide Exceptional Student Education (ESE) training opportunities regarding students with disabilities with regard to compliance or curricular related issues (academic or behavior) was of concern to the monitoring team. A second concern was the lack of tracking of the educational performance (academic and behavior) of students with disabilities who are not pursuing a standard diploma. The district ESE director provides strong support to schools upon request. There appears to be strong instructional leadership at the individual schools. There were concerns, however, that the staffing specialists need staff development in the areas of assisting schools with compliance issues related to the development and implementation of Individual Education Plans (IEPs) (writing goals and objectives, and evaluation procedures), Extended School Year (ESY) training, prereferral timelines, and the development of interim student progress reports. There appears to be a lack of clarity at the district level regarding the roles and responsibility for specific programmatic areas such as Department of Juvenile Justice (DJJ), basic education classes at the alternative school, gifted programs, Section 504, and the role and use of child study teams at schools.

Assessment

It appears that students with disabilities routinely participate in the Florida Comprehensive Achievement Test (FCAT) and other assessments. For those students not taking the FCAT, the district makes good use of alternate assessments. The district uses a retention/promotion committee as an appeal process for special cases regarding promotion and retention. At the high

school, curricular and assessment accommodations were not as well known or consistently used as at lower grades. In all three schools there was no evidence that accommodations were individualized to meet the unique needs of the students, nor were they based on the students' IEPs.

Behavior/Discipline

Based on interviews, classroom observations, and case studies, it appears that none of the schools, with the exception of Starke Elementary, have an effective school-wide discipline plan that provides for consistent application of expectancies, consequences, and out-of-class interventions. There were generally good behavior management strategies used in the classrooms observed. Discipline procedures are generally more reactive than proactive. There was, however, a need to develop and/or implement comprehensive school-wide discipline plans to ensure consistency across classrooms. The district has a high incidence of In-School Suspension (ISS) usage with no curricular content for the program. Behavior management strategies used at the high school appeared to be more punitive in nature than at the middle or elementary schools. Functional Behavior Assessments (FBAs) and Behavioral Intervention Plans (BIPs) were reported to be conducted by a contracted agency, Meridian Behavioral Health Care, at the district level, or school level but did not appear to be implemented at the classroom level once developed. The monitoring team did not find evidence of a BIP having been implemented in any of the classrooms visited.

Curriculum and Instruction

There was evidence of good academic programs at Alligator STOP Camp, Bradford High School, Bradford Middle School, Starke and Southside Elementary Schools. Starke Elementary School had an exemplary science curriculum in addition to their basic education curriculum. There appeared to be a lot of thought and analysis behind choice of curriculum based on FCAT scores, assessment of Sunshine State Standards and alternative assessments. There is a concern that ESE classes for students with disabilities will continue to use SRA while regular education classes will use another reading curriculum, which may inhibit opportunities for mainstreaming. Another concern was that the high school curriculum did not seem to have a structured or comprehensive scope and sequence for students with disabilities and followed a fragmented traditional methodology.

Least Restrictive Environment

The district appeared to appropriately provide a wide range of placement options for students with disabilities. However, there was concern that the district does not provide adaptive physical education for those students who have need of that service.

Post-School Transition

The lack of agency support, interagency agreements, and vocational opportunities for students with disabilities at the middle school and high school is of concern. The transition plan pages of the IEP are generally vague and the course of study was not indicated on the IEP forms beginning at age 14. The high school principal was unaware of the transition process for students with disabilities.

Pre-K/Transition from Part C to B Programs

There appears to be good communication with Pre-K agencies even though there is no interagency agreement. The district is to be commended for their use of inclusion models at the preschool level.

Parent Involvement

The district makes a good faith effort to get parents to attend IEP meetings. Due to the size of the community, it appears that there is significant opportunity to contact parents through informal measures.

Gifted

There is a significant lack of support for the gifted program. One teacher cannot meet the needs of all the gifted students in the elementary schools and the middle school. Consultative services at the high school are inadequate to meet the need of gifted students. Students are not being provided curricula and services based on their individual needs. There is a strong need for staff development, curricula, and increased staff for the gifted program at the elementary, middle, and high school levels. There is a severe need to address the under-representation of minority students in the gifted program.

Record and Forms Reviews

Student Record Reviews, IEP

Systemic findings were identified in the development of measurable and appropriate annual goals, including short-term objectives and benchmarks. There were also systemic findings regarding parent notice, including failure to identify purpose of the meeting, failure to invite appropriate members of the team (including the student when appropriate) and failure to provide procedural safeguards with parent notice. Other systemic findings included inadequate statements of how the student's disability affects participation and progress in the general curriculum and the lack of interim progress reports related to annual goals. Two of the three cost factor matrices contained findings of inaccurate reporting. Individual findings for student records were noted in 18 areas, as noted above. Federal funds will be adjusted for one student due to the lack of a second parent conference prior to initial eligibility and for one student due to the lack of prior notice of change of placement. Florida Education Finance Program (FEFP) funds will be adjusted for two students due to inaccurate reporting of matrix cost factors to the state. The name of the students will be provided under separate cover.

Student Record Reviews, EP

There are no systemic findings related to compliance of EPs for gifted students.

Special Category IEP Reviews

Findings in the area of special categories were noted in

- appropriate dismissal procedures
- transition from Part C to Part B programs
- temporary placements
- initial eligibility

System Improvement Plan

In response to these findings, the district is required to develop a system improvement plan for submission to the Bureau. This plan must include activities and strategies intended to address specific findings, as well as measurable indicators of change. In developing the system improvement plan, every effort should be made to link the system improvement activities resulting from this random monition report to the district's continuous improvement monitoring plan. The format for the system improvement plan, including a listing of the critical issues identified by the Bureau as most significantly in need of improvement, is provided at the end of this report.

Monitoring Process

Authority

The Florida Department of Education, Bureau of Instructional Support and Community Services, in carrying out its roles of leadership, resource allocation, technical assistance, monitoring, and evaluation is required to: examine and evaluate procedures, records, and programs of exceptional student education; provide information and assistance to school districts; and otherwise assist school districts in operating effectively and efficiently (Section 229.565, Florida Statutes). In accordance with the Individuals with Disabilities Education Act (IDEA), the Department is responsible for ensuring that the requirements of IDEA are carried out and that each educational program for children with disabilities administered in the state meets the educational requirements of the state (Section 300.600(a)(1) and (2) of Title 34, Code of Federal Regulations).

The monitoring system established to oversee exceptional student education (ESE) programs reflects the Department's commitment to provide assistance and service to school districts. The system is designed to emphasize improved outcomes and educational benefits for students while continuing to conduct those activities necessary to ensure compliance with applicable federal and state laws, rules, and regulations. The system provides consistency with other state efforts, including the State Improvement Plan required by the IDEA.

Method

With guidance from a work group charged with the responsibility of recommending revisions to the Bureau's monitoring system, substantial revisions to the Bureau's monitoring practices were initiated during the 2000-01 school year. Three types of monitoring processes were established as part of the system of monitoring and oversight. Those monitoring processes are identified as follows:

- focused monitoring
- continuous improvement/self assessment monitoring
- random monitoring

Random Monitoring

The purpose of random monitoring is to continue to ensure school districts' compliance with federal and state laws, rules, and regulations regarding exceptional student education programs and projects, as well as to assess the districts' implementation of procedures related to the requirements. Additionally, the random monitoring process is intended to assist districts in the development of improvement plans related to compliance and implementation of exceptional student services.

District Selection

In order that districts be involved in the monitoring process in the most effective manner, a system was developed for the selection of districts for participation. After a review of the data

associated with the triggers for focused monitoring, seven districts were selected for the focused monitoring process. Specific data from Survey 5 of the 2000–2001 school year was submitted to the Department of Education by Bradford County, and was utilized in the selection of Bradford for focused monitoring. The Bureau’s review of this data indicated that none of the students with disabilities in Bradford County attained a standard diploma during the survey period. Through further examination of the reported figures, it was discovered that the data related to students graduating with a standard diploma submitted by Bradford County was inaccurate. In light of these inaccuracies, Bradford County will be required to complete a quality data review in coordination with the office of the Department of Education. Consequently, the decision was made to change the monitoring activities for Bradford County from focused to random.

Off-Site Monitoring Activities

Surveys were designed by the University of Miami research staff in order to provide maximum opportunity for input about the district’s ESE services from parents of students with disabilities and parents of students identified as gifted. Results of the surveys will be discussed in the body of this report. Data from each of the surveys are included as appendix A.

Parent Surveys

Surveys were mailed to 938 parents of students with disabilities and 81 parents of gifted students, with 160 (17%) of the parents of students with disabilities responding and 35 (43%) of the parents of gifted students responding. One hundred and twenty-four (13%) of the surveys for parents of students with disabilities and two (2%) of the gifted surveys were returned as undeliverable. The surveys that were sent to parents were printed in both English and Spanish, and included a cover letter and postage paid reply envelope.

Reviews of District Forms and Special Categories Records

At the Department of Education (DOE), Bureau staff members conducted a compliance review of selected district forms and notices to determine if the required components were included. Bureau staff also conducted reviews of “special category” student records and procedures. The results of the review of district forms and special categories records will be described in this report.

On-Site Monitoring Activities

The on-site monitoring visit occurred during the week of May 20, 2002. The on-site activities were conducted by a team of six DOE staff. On-site monitoring activities consisted of

- interviews with district and school level staff to gather information from multiple sources offering different points of view
- student case studies
- classroom visits to investigate classroom practices and interventions
- on-site reviews of selected student records

Prior to the on-site visit, Bureau staff notified district staff of the selection of the following schools to be visited: Bradford High School, Starke Elementary School, Southside Elementary School, Bradford Middle School, and Alligator Creek Short Term Offender Program (STOP) Camp, the Department of Juvenile Justice facility in Bradford County.

The on-site selection of students for the case studies at each school was based on data indicating an overrepresentation of African-American students in emotionally handicapped/severely emotionally disturbed (EH/SED) programs and an inflated identification of students in all major categories. Schools were asked to provide a list of students who were identified as SED, EH, educable mentally handicapped (EMH), and/or specific learning disabled (SLD). Schools also were asked to provide a list of students who were gifted. Case study students were selected from those lists.

At each school site, a minimum of four student records was reviewed. The records were chosen to include a student whose current IEP reflects initial placement in ESE, a student with a matrix rating of 254 or 255, and a gifted student. At least one additional record was selected at each site, chosen at the discretion of Bureau staff.

Reporting Process

Exit Conference

On the last day of the monitoring visit, a meeting was held with the district ESE administrator and district staff. Preliminary findings and concerns were shared at this time.

Preliminary Report

Following the on-site visit, Bureau staff prepares a preliminary written report. The preliminary report is sent to the district, and Bureau program specialists are assigned to assist the district in developing appropriate system improvements for necessary areas. Data for the report are compiled from sources that are discussed in this document, including the following:

- LEA profiles
- parent surveys
- reviews of student records (IEPs and EPs)
- reviews of forms
- case studies
- classroom visits
- interviews with district and school staff
- review of special category Individualized Educational Plans (IEPs)

The report is developed to include the following elements: a description of the monitoring process, background information specific to the district, reported information from monitoring activities, and a summary. Appropriate appendices with data specific to the district will accompany each report.

Final Report

In completing the system improvement section of the report, every effort should be made to link the system improvement activities for random monitoring to the district's continuous improvement monitoring plan. In collaboration with Bureau staff, the district is encouraged to develop methods that correlate activities in order to utilize resources, staff, and time in an efficient manner in order to improve outcomes for students with disabilities.

Within 30 days of the district's receipt of the preliminary report, a system improvement plan including strategies and activities targeting specific findings, must be submitted to the Bureau for review. The format for the plan is given at the end of this report. Within 30 days of the Bureau's review, a final report including the district's system improvement plan will be released.

Background

Demographic Information

The data contained in this section of the report is a summary of the 2000-2001 data presented in the annual data profile provided to each district. Each element is reported over a period of three years and is presented with comparison data from the state and enrollment group for the district. Profiles are available from the Bureau and from individual districts upon request.

Bradford County School District has a total school population (PK-12) of 4,096 with 938 (24%) students being identified as students with disabilities and 81 (2%) identified as gifted. Bradford County is considered a “small” district and is one of 25 districts in this enrollment group. Of the total Bradford school population, 73% are White, 25% are Black, and 1% are Hispanic. Of the students with disabilities, 67% are White, 32% are Black, and <1% are Hispanic. Of the students identified as gifted, 95% are White, 3% are Black, and 2% are reported as “other.” Fifty-two percent of the district’s population is eligible for free/reduced lunch.

Bradford County School District is comprised of five elementary schools, one middle school, one high school, one vocational technical center, one alternative school, two childcare programs, and one Department of Juvenile Justice (DJJ) facility.

According to the 2000-01 data, the rate of participation in the Florida Comprehensive Assessment Test (FCAT) at all grade levels reported is above the state average. At the high school level, the rates of participation were 85% in both reading and math. Middle school participation was 91% and 93% for reading and math respectively, while the state average is 76% for both reading and math. At the elementary level, Bradford students participated at a rate of 100% for reading in fourth grade, and 91% for math in fifth grade. The state averages for these were 86% and 81%, respectively.

A review of the data related to student performance on the FCAT from the 1999-00 and 2000-01 school years reveals that, while the percentage of students performing at level three or above in reading in the fourth grade decreased from 31% to 15%, it increased from 0% in eighth and tenth grade to 9% and 8%, respectively. During this same time period, the percentage of students performing at level three or above in math in the fifth grade dropped from 13% to 6%, increased from 5% to 9% in the eighth grade, and increased from 4% to 10% in the tenth grade.

Bradford County School District reports a retention rate for students with disabilities (8%) that is similar to both the enrollment group (6%) and the state (7%). It reports a higher dropout rate (9%) for students with disabilities than the enrollment group (5%) and the state (5%).

For the 2001-2002 school year, Bradford County reports that 60% of its students with disabilities (ages 6-21) spend 80% or more of their school week with their nondisabled peers. This rate is higher than both the state rate of 48% and the similar enrollment group rate of 46%. In contrast, the district reports that 0% of their prekindergarten students (ages 3-5) receive all of their special education and related services in natural environments.

A review of the data related to student membership by racial/ethnic category revealed a degree of disproportionate representation. While black students comprise 25% of the student population as a whole, they represent 32% of the students with disabilities, and 3% of the students identified as gifted. Compared to the state, the district also has an higher rate of identification for the high incidence disability categories of specific learning disabled (SLD), emotionally handicapped/severely emotionally disturbed (EH/SED), and educable mentally handicapped (EMH), and a lower rate of identification of students for the gifted program.

Reporting of Information

Sources of Information

Data for this report are compiled from a variety of sources accessed before and during the on-site visit including:

- review of district forms
- surveys returned by 160 parents of students with disabilities
- surveys returned by 35 parents of gifted students
- twenty-eight individual district and school staff interviews
- four case studies of students with disabilities
- eleven classroom visits for students with disabilities
- three case studies of students identified as gifted
- three classroom visits for students identified as gifted
- nine IEP reviews
- five EP reviews
- review of seventeen special category IEPs

The data generated through the surveys, individual interviews, case studies, and classroom visits are summarized beginning on page 12, while the results from the review of student records and district forms are presented beginning on page 22 of the report. This report provides conclusions with regard to the areas related to the educational benefit for children and compliance with federal and state guidelines. These areas include:

- general supervision
- assessment
- behavior/discipline
- curriculum and instruction
- least restrictive environment
- post-school transition
- Pre-K, transition from Part C to Part B programs
- parent involvement
- gifted

To the extent possible, this report focuses on systemic issues rather than on isolated instances of noncompliance or need for improvement. Systemic issues are those that occur at a sufficient enough frequency that the monitoring team could reasonably infer a system-wide problem. Findings are presented in a preliminary report, and the district has opportunity to clarify items of concern. In a collaborative effort between the district and Bureau staff, system improvement areas are identified. Findings are addressed through the development of strategies for improvement, and evidence of change will be identified as a joint effort between the district and the Bureau.

Parent Surveys, Individual Interviews, Case Studies, and Classroom Visits

General Supervision

Based on interviews with district and school-based staff it was reported that there were no district-wide or school-based training activities related to students with disabilities. The ESE director reported that the district would be participating in the Florida Reading Initiative in July. It was unclear as to the extent that students with disabilities would be involved, especially those on a special diploma track or those in full-time settings.

The district reported that their student services department tracks all student performance on the FCAT and uses the results for planning and placement. Students, including those with disabilities, in the lowest quartile are placed in remedial classes. Bradford Middle School and Starke Elementary School reported that they track FCAT scores and use the information for class placement. No schools reported tracking the educational performance of students with disabilities who are not on a standard diploma track.

Reading initiatives are strongly emphasized in most schools. In some schools, the Computer Curriculum Corporation (CCC) using the Success Maker software is a strong component of the school curriculum.

While no school reported tracking behavioral performance of students for placement or curricular purposes, behavior is tracked at the school level at Bradford High School. An innovative program is being designed and developed for disruptive youth that receive out-of-school suspension (OSS) for more than 3 days. These students will be assigned to a special program at Robinson-Jenkins-Ellerson Center (RJE). Another innovative program, affecting educational benefit, is a special counseling program that is being developed at Booker Elementary School and is designed to increase student self esteem.

The ESE director reported that he uses monitoring checklists provided by various quality assurance programs to self assess and monitor federal and state requirements in order to affect needed programmatic changes. He also stated that he does random checks of IEPs. Interviews with district staff indicate that there appears to be a lack of clarity at the district level regarding the policies and procedures regarding specific programmatic areas such as DJJ, basic education classes at the alternative school, gifted programs, Section 504, and the role and use of child study teams at schools.

Interviews with school staff indicate that the ESE director is very responsive to requests for technical assistance. However, the staffing specialists were reported to be inconsistent in both their responsiveness and in providing accurate information.

One staffing specialist reported to be assigned to one specific school. It was reported that the rest of the schools were attended by the staffing specialist available at the time. Staffing specialists assume the role of coordinating the IEP meetings. This was consistent with what was reported through school based interviews. Teachers indicated that they were not sure which staffing specialist would attend IEP meetings or which staffing specialist they should contact for technical assistance. The staffing specialists reported that the teachers are responsible for writing

the IEPs at the meeting. A review of IEPs indicated that the staffing specialists need to take more of a leadership role in ensuring that IEPs are compliant.

With regard to Extended School Year services (ESY), the district indicated that the determination of special education needs for the summer is based on the input of the IEP team, but due to budget constraints ESY services are very limited. Interviews with staff at all three schools indicated that ESY services were not offered.

With regard to testing, evaluations are reported to be completed within 90 days and district staff report that, for the most part, those timelines are met.

There was evidence of strong school based leadership in the areas of curriculum, behavior management, and instructional support as evidenced through interviews with school-based administrators, case studies, and classroom visits.

It was reported that there is no district-level ESE advisory council. However, as a topic of discussion at the district level, the development of one has been considered.

In summary, the lack of district or school-wide ESE training opportunities regarding students with disabilities with regard to compliance or curricular related issues (academic or behavior) was of concern to the monitoring team. A second concern was the lack of tracking of the educational performance (academic and behavior) of students with disabilities who are not pursuing a standard diploma. The district ESE director provides strong support to schools upon request. There appears to be strong instructional leadership at the individual schools. There were concerns, however, that the staffing specialists need staff development in the areas of assisting schools with compliance issues related to the development and implementation of IEPs (writing goals and objectives, and evaluation procedures), ESY training, prereferral timelines, and the development of interim student progress reports. There appears to be a lack of clarity at the district level regarding the roles and responsibility for specific programmatic areas such as DJJ, basic education classes at the alternative school, gifted programs, Section 504, and the role and use of child study teams at schools.

Assessment

The district reported that the IEP team makes decisions regarding student participation in the FCAT. Overall the district has a very high rate of participation for students with disabilities. The IEP team considers the student's academic progress and the results of current evaluations when determining if a student should take the FCAT. Based on interviews and case studies, it was determined that students who are in self-contained settings usually do not take the FCAT.

All schools reported that the decision on whether or not the student will take the FCAT is made at the IEP team meeting. It was also reported that there is great pressure for the student, if at all possible, to take the FCAT. At Bradford Middle School and at Starke Elementary School, teachers indicated that they are familiar with the DOE test preparation booklet and provide accommodations such as extended time, flexible setting, and flexible presentation (reading appropriate portions of the tests). At the high school, regular education teachers indicated that they do not routinely give the FCAT to ESE students who need accommodations. ESE teachers give ESE students the FCAT. The ESE teachers at the high school reported that ESE students

are given the same test preparation as other students and receive flexible setting and extended time as testing accommodations.

At Bradford High School regular education teachers reported that they are not sure of the accommodations listed on the IEP, but listed accommodations such as extended time, advanced organizers, and special seating arrangements as being those that are generally provided to all students with disabilities. Accommodations for standardized testing are not always the same as those provided in the classroom. At all three schools, there was no indication that accommodations were either individualized to meet the unique needs of the students or based on students' IEPs.

The district reported that the schools use the Brigance, Performance Assessment System for Students with Disabilities (PASS-D) and portfolios for alternate assessments. Teachers at the schools administer and maintain these assessment protocols, although there was some confusion about where the results were supposed to be kept. In all three schools it was reported that the Brigance and portfolios are used as an alternate assessment. The high school also reported using Life Centered Career Education (LCCE) as an alternate assessment.

The ESE director reported that promotion for many students with disabilities is dependent upon attainment of 80% of IEP objectives. Other district staff did not share this opinion and reported that most ESE students are not retained even if they do not meet standards for promotion. Bradford High School reported that promotion/retention is based on accumulation of the appropriate number of credits. Some ESE students may be classified in one grade level, but are taking courses from the previous grade level. It was reported that there are multiple ways students can earn credits including Florida virtual school, work programs, and classes. It was unclear if these options were available for students with disabilities. The middle school reported that all students must follow the district's pupil progression plan or meet IEP requirements to get promoted. However, it was reported that in some instances students are administratively placed. The child study team (CST) coordinator at Starke Elementary reported that the determination of promotion/retention is generally decided by the pupil progression plan, but that the principal makes the final decision. The principal reported that he takes into consideration previous retention of the student, CST involvement, discipline, and the effects of the student's disability as well as the teacher's input. There is a district retention/promotion committee used in an appeal process for special cases.

In summary, it appears that students with disabilities routinely participate in the FCAT and other assessments. For those students not taking the FCAT, the district makes good use of alternate assessments. The district uses a retention/promotion committee as an appeal process for special cases regarding promotion and retention. At the high school, curricular and assessment accommodations were not as well known or consistently used as at lower grades. In all three schools there was no evidence that accommodations were individualized to meet the unique needs of the students, nor were they based on the students' IEPs.

Behavior/Discipline

It was reported by the district that the high school and middle school both use in-school suspension (ISS), but it was unclear after review of the data if the elementary schools use ISS. There are no formal social skills or behavior curricula for ISS. The use of OSS is a school-based

decision. Each school tracks suspensions for students with disabilities so that manifestation determination meetings can be held if the student accumulates 10 days of suspension. If behaviors are severe, students are sent to the Renaissance School, an alternative school for students who have serious conduct code violations. The ESE director reported that each school's CST assists teachers with behavior problems. In addition, it was reported that the district has a contract with Meridian Behavioral Health Care whose behavior analysts assist in the development of Functional Behavioral Assessments (FBA) and Behavior Intervention Plans (BIP) and provide follow-up support for the teachers to ensure implementation of the plans. This information was in contrast to the information reported in teacher and staff interviews where teachers and staff indicated that CSTs rarely meet and teachers do not participate in FBAs or BIPs.

At Bradford High School, teachers were not aware of the discipline policy for students with disabilities. Teachers interviewed use a reactive, consequence-driven, behavior management system with little positive reinforcement. ISS is short term ranging from one class period to two days. OSS is capped at ten days for ESE students. At ten days a manifestation determination meeting is held and a BIP is developed. The teachers interviewed reported that they do not participate in the FBAs or BIPs. "Zero tolerance" policies for certain infractions may result in placement at the Renaissance School for ESE students. Bradford High School has no CST but they reported having informal meetings with the parents and the students regarding behavioral issues.

At Bradford Middle School, teachers reported that there is a school-wide discipline plan, but they use their own individual behavior management plans in the classroom. ESE teachers use a cost-response behavior management system and have built in positive reinforcers that are intermittently used. Regular education teachers use a reactive, consequence-driven system. According to the principal, when students with disabilities reach ten days of suspension, a manifestation determination meeting is held and a BIP is developed. The teachers reported, however, that they do not participate in the FBAs or BIPs. It was reported by the teachers at the school that they have very few CST meetings and, when they are held, they are used to brainstorm ideas for problematic students.

At Starke Elementary School, teachers reported that there is a school-wide discipline plan but that they use their own individual classroom management systems. Regular education teachers use a reactive consequence-driven behavior management system. Teachers interviewed feel that a call to the parent seems to be the most effective intervention. One teacher at Starke Elementary indicated that she participated in developing a FBA and BIP but was unsatisfied with the format and process. The CST meets to discuss problematic students and tries to develop proactive interventions. The team uses a variety of resources including published materials and staff expertise.

In summary, based on interviews, classroom observations, and case studies, it appears that none of the schools, with the exception of Starke Elementary, have an effective school-wide discipline plan that provides for consistent application of expectancies, consequences, and out-of-class interventions. There were generally good behavior management strategies used in the classrooms observed. Discipline procedures are generally more reactive than proactive. There was, however,

a need to develop and/or implement comprehensive school-wide discipline plans to ensure consistency across classrooms. The district has a high incidence of ISS usage with no curricular content for the program. Behavior management strategies used at the high school appeared to be more punitive in nature than at the middle or elementary schools. While district staff reported that FBAs and BIPs were conducted and/or developed by a contracted agency, Meridian Behavioral Health Care, their implementation was not evident at the school level, and teachers reported that they were not involved in the process. The monitoring team did not find evidence of a BIP having been implemented in any of the classrooms visited.

Curriculum and Instruction

The ESE director stated that a district curriculum committee, including an ESE representative, determines the appropriate curriculum materials for students with disabilities. There appeared to be a lot of thought and analysis behind choice of curriculum, with decisions based on student FCAT performance, assessment of Sunshine State Standards, and alternate assessments. The ESE director reported that in-service training was provided on the use of instructional and assessment accommodations, and that both ESE and regular education teachers participated. However, interviews with ESE and regular education teachers in the schools did not support this.

Interviews with district staff reported that the IEP teams assess how the student is performing in the regular education classroom in order to determine the appropriate curriculum. However, one staffing specialist could not explain how an ESE student could access the regular education curriculum in an ESE classroom while the other staffing specialist stated that if the ESE student could complete the regular education curriculum he would be placed in regular education classes. It was reported that if the student is pursuing a standard diploma, the student can have adjustments made to curriculum and instruction to accommodate the student but it was unclear as to how this was done. The school psychologist conducts evaluations and provides recommendations for behavioral interventions but very little in the way of curricular or academic interventions or recommendations.

The district used Science Research Associates (SRA) reading series district-wide until recently. Interviews with the district staff indicated confusion as to whether SRA is currently a special education curriculum or if it is used by regular education teachers as well. This confusion has the potential to be problematic with regard to transitioning ESE students into mainstreamed classrooms. Interviews with some district staff also revealed a lack of knowledge as to the curriculum and strategies used in the schools for both ESE and regular education students.

At Bradford High School, one regular education teacher interviewed reported that he uses accommodations listed on the students' IEPs for instructional accommodations but indicated that it is his responsibility to identify those students in his class who are ESE and find out for himself what those accommodations are. The teacher stated that if the student is on a standard diploma track there are virtually no modifications to the curriculum in content or delivery. The curricula for students with disabilities in the ESE classroom (except for one classroom) seemed to be fragmented and did not appear to follow a structured scope and sequence.

At Bradford Middle School, the teachers interviewed and the classes observed revealed that teachers used traditional teaching practices and general accommodations that were not tailored to

the unique needs of the individual students. However, in one regular education classroom observed, the teacher made good use of the tape recorder, individual reading techniques, mentoring strategies, and other individualized accommodations to instruction.

At Starke and Southside Elementary Schools, the teachers interviewed and observed made excellent use of accommodations for instruction and assessment. They include ESE students in all activities within the classroom and one teacher observed at Starke Elementary School runs a model inclusive setting. Starke Elementary had an exemplary science curriculum in addition to the basic curriculum.

At Alligator STOP Camp, a short-term (21 day) DJJ facility, the instructor reported that she follows the regular education curriculum and provides regular education credit while the students are enrolled at the facility. During the observation, students were working on individualized materials with one-on-one assistance from the teacher, as needed.

In summary, there was evidence of good academic programs at Alligator STOP Camp, Bradford High School, Bradford Middle School, Starke and Southside Elementary Schools. Starke Elementary School had an exemplary science curriculum in addition to their basic education curriculum. There appeared to be a lot of thought and analysis behind choice of curriculum based on FCAT scores, assessment of Sunshine State Standards and alternative assessments. There is a concern that ESE classes for students with disabilities will continue to use SRA while regular education classes will use another reading curriculum, which may inhibit opportunities for mainstreaming. Another concern was that the high school curriculum did not seem to have a structured or comprehensive scope and sequence for students with disabilities and followed a fragmented traditional methodology.

Least Restrictive Environment

The district reported that placement decisions are made at the IEP meeting. The decision is made as to whether or not the student can be academically successful in regular education classes. If not, the team first determines if the student can be placed in a resource setting with consultative services. Students working toward a standard diploma are involved in regular education classes. At the high school level, if the decision is made for the student to pursue a special diploma they take courses with ESE standards. Regular education teachers are present at all IEP meetings. Their role was reported to be to explain how the student is progressing in the regular education program.

At Bradford High School, students with disabilities are interspersed on grade level teams, and the regular education teachers always participate at IEP meetings. ESE teachers, who generally serve on a consultative basis, are very accessible to regular education teachers. A concern noted at the high school was the lack of adaptive physical education for students who need it. One ESE teacher reported that he was told not to check adaptive physical education on students' IEPs because the district does not offer it. It was reported that this teacher accompanies students to physical education to assist in making adaptations that will allow his students to participate to the extent possible.

At both Bradford Middle School and Starke Elementary School, there is a self-contained classroom, resource classroom and several inclusion models. Regular education and ESE teachers report significant support and communication between each other. They report that they often trade materials and ideas, observe each other's classrooms and provide suggestions for problematic students. The regular education teachers attend IEP meetings and feel free to provide input. Students with disabilities participate in music, art, and physical education, lunch, assemblies and other extra-curricular activities with nondisabled peers. Many students with disabilities are enrolled in an inclusion model and receive academic and special education services in the basic education classroom setting.

In summary, the district appeared to appropriately provide a wide range of placement options for students with disabilities. However, there was concern that the district does not provide adaptive physical education for those students who have need of that service.

Post-School Transition

The ESE director reported that the district has good parental support for transition meetings. However, this is in conflict with parental involvement reported by school personnel. In general most school-based staff reported that parental support was poor. Parents and students are informed of the transfer of rights requirements at an IEP meeting when the students turn 16. A review of the IEPs indicate that the transition plan pages of the IEP are generally vague and do not contain a course of study statement beginning at the age of 14. Agencies are invited to attend the IEP/transition meetings through notes and phone calls, but the district reports that agency attendance is very poor which makes for a weak planning process. The district does not have any interagency agreements.

The district reported that there is not a specific handbook or procedures manual to follow that addresses the provision of transition services. They have a draft manual that supplements the Quality IEP and provides different examples of transition services. The district reported that the transition process begins when the students turn 13, but who may wait until age 16 to make diploma option decisions.

Transition work programs available to students with disabilities include Sunshine Industries through the Association for Retarded Citizens (ARC); job coaching through Vocational Rehabilitation; and the Independent Living Center in Gainesville. The district noted the work of a retired ESE teacher who works with students with disabilities at Bradford High School and assists them in getting jobs locally or transitioning to the vocational school. However, the principal at the high school was unaware of the transition requirements or process for students with disabilities.

At Bradford Middle School, staff reported that there was minimal support for students with disabilities with regard to vocational opportunities and other related transition services. The transition process at the middle school begins in the IEP meeting before students turn 14, where students and parents are made aware of the diploma options.

At Starke Elementary School, staff reported that they have volunteers from Big Brothers/ Big Sisters, high school mentors, and Key Club. Community and school grants help out with supplies

and summer school. Elementary school staff reported having a lot of support from the community.

In summary, the lack of agency support, interagency agreements, and vocational opportunities for students with disabilities at the middle school and high school is of concern. The transition plan pages of the IEP are generally vague and the course of study was not indicated on the IEP forms beginning at age 14. The high school principal was unaware of the transition process and requirements for students with disabilities.

Pre-K/Transition from Part C to Part B Programs

The Rainbow Center provides Pre-K Part C to Part B Transition services. A child in need of screening will be referred to Florida Diagnostic and Learning Resources System (FDLRS) for screening. After the screening, the child will be referred to Developmental Early Intervention program (DEI) through Shands Hospital in Gainesville. Screenings from FDLRS and evaluations from DEI are reviewed by school psychologists to determine if additional evaluations are needed. Family Service Plans, evaluations, transition plans, etc. are all sent to the district office and are available for district staffings. The district does not have an interagency agreement, but works primarily with DEI and FDLRS on transition from Part C to Part B.

Referrals are made to Children's Registry Information System (CHRIS). DEI notifies the district of children who are in need of services. When the child is 2 1/2 years old, the child is ready to be staffed into the PreK program, with the assistance of Children's Medical Services (CMS) or DEI.

The service delivery models used include a center school, two school based Pre-K ESE classes, slots in private schools, and Head Start although the director was not sure how Head Start operates. All of the classes are using a total inclusion model.

The district requires that parents be involved in the transition meetings. Parents are also involved in school-based activities for students who are three or younger.

In summary, there appears to be good communication with Pre-K agencies even though there is no interagency agreement. The district is to be commended for their use of inclusion models at the preschool level.

Parent Involvement

The district reported that parents are invited to all IEP meetings and students are encouraged to attend. Parents are not usually involved in CST meetings when these are held, however, they are notified of the results. One staffing specialist had difficulty in giving examples of strategies used to involve parents, stating that the district has parent educators whose responsibility this is.

The ESE director reported that the community itself generates parental involvement. It is a small community and many people know each other. The director stated that he frequently calls parents to encourage them to come to a particular meeting. In addition, to encourage attendance for group meetings, the district tries to offer refreshments and childcare.

During the evaluation process, the district interviews the parent using a child behavior checklist. If the documentation indicates a severe behavioral problem, the staffing specialist or school psychologist may conduct a home visit, but this is rare. The school psychologist reported that she takes time to read over the psychological report with the parent to ensure understanding.

At Bradford High School, it was reported that it is difficult to get parent participation for all students, including students with disabilities. Staff makes phone calls and schedule conferences. All parents are invited to the IEP meetings; however, most do not attend unless there is a problem. Teachers know the parents in the community and make frequent informal contact with them. All teachers reported that few parents attend reevaluation meetings. The principal reported that he was not aware of any parents of students with disabilities who were involved with the parent/teacher organization (PTO).

At Bradford Middle School, it was also reported that there is little parent participation. Attempts to involve parents are through telephone calls. One regular education teacher sends a letter home at the beginning of the year with a course syllabus and a questionnaire for the parents asking for input regarding their expectations for their children. She reported that she gets a fair number of these letters back. All parents are invited to the IEP meetings; however, most do not attend unless there is a problem. Teachers know the parents in the community and make frequent informal contact with them. All teachers also reported that few parents attend reevaluation meetings. The PTO at the middle school was strong at the beginning of the year but participation has waned in the past few months.

At Starke Elementary School, two of the four teachers interviewed felt that most parents do not attend IEP meetings unless there is a problem. One teacher interviewed stated that she has frequent contact with her parents. She cites that having a phone in her classroom makes it easier to keep in frequent contact. Another teacher uses incentives for her students to get their parents to attend. She also calls the parent the day before and assists with transportation. She reports good attendance at IEP meetings. A third teacher goes over the results of the IEP meetings by phone for those parents who can not attend. All teachers reported that few parents attend reevaluation meetings. The School has ESE parents on the School Advisory Committee (SAC). They have attempted to structure the SAC to mirror the school's minority representation on the SAC committee.

In summary, while parent involvement in school activities is limited overall, the district makes a good faith effort to get parents of students with disabilities to attend IEP and reevaluation meetings. When parents are unable to attend formal meetings, they encourage participation through notes home and phone calls. Due to the size of the community, it appears that there is significant opportunity to contact parents through informal measures.

Gifted

The district reported that there is only one staffing specialist who works with the gifted population. There is no district-wide screening process for gifted. The school psychologist reported that if any parent requests that their child be assessed for gifted, an evaluation is completed. If the teacher makes the request, the guidance counselor reviews FCAT scores and administers the Kaufman Brief Intelligence Test (KBIT) to determine if a full evaluation is warranted. The psychologist indicated that many students do not qualify after the district

completes the evaluation but parents bring in independent evaluations that indicate eligibility and the district places the child in the program based on the independent evaluation. The district does not have a Plan B for Gifted.

The service delivery model for gifted is driven by the availability of the teacher. The district has one gifted teacher for K-8 who is not certified for elementary school. She is at Starke Elementary School for one day and Southside Elementary School for one day. Curriculum and instruction for gifted students is dependent upon the skills of the teacher. The gifted coordinator reported that there is no process for ensuring that services on the IEP/EP are being implemented. There has been no training provided to the gifted teacher. There is no gifted advisory counsel. There are poorly defined dismissal procedures. The gifted coordinator reported that gifted students do drop out of school due to boredom and lack of stimulating curriculum.

At Bradford High School it was reported that there are no screening procedures to identify gifted students at the high school. Gifted services at this level are provided through a consultative model. Gifted students primarily take Advanced Placement (AP) or honors courses or are dually enrolled in college courses and receive "counseling" from the gifted teacher. Regular teachers are made aware of who the gifted students are and are expected to make the curriculum challenging for them. The school has only one AP class (in math). One regular education teacher reported that he had many interactions with parents and made frequent telephone calls to them. Another teacher reported infrequent contact. Teachers interviewed stated that the high school does not meet the needs of students who are gifted. The Educational Plan (EP) is reviewed annually but the assistant principal reported that he wished it could be reviewed every three years.

At Bradford Middle School the gifted teacher teaches two periods per day. She teaches a gifted class for one hour every morning and then teaches a remedial reading class for one hour. The gifted program is a resource pullout program for language arts for all gifted students at the school regardless of their ability or unique skills. The regular education teachers interviewed stated that they make attempts to make the curriculum more challenging for their students who are gifted. Only one of the teachers interviewed has attended an EP meeting. Both teachers interviewed stated that they attempted to maintain contact with parents of children who are gifted in the same manner as they do with students who have disabilities but with varying levels of success.

The gifted teacher is at Starke Elementary School for 1/2 day per week. She has 18 students in grades 1-5 and provides enrichment services. The assistant principal completes screenings. The CST Coordinator sends all referrals to the school psychologist to determine who will be tested and reported that it is now a district-level decision as to who will be evaluated. Regarding the identification of curriculum and services, the gifted teacher reported that it was left to her to decide what was appropriate. Interviews with staff at the school indicated they felt that parents were disappointed with the services provided for students who are gifted. This is supported by parent surveys which indicated that only 27% of the respondents felt that their children were academically or creatively challenged and only 38% are satisfied with the services that their children are receiving. Staff interviewed also expressed concern that one teacher covering all elementary schools and the middle school was not enough. There was no gifted teacher at the high school.

In summary, there is a significant lack of support for the gifted program. One teacher cannot meet the needs of all the gifted students in the elementary schools and the middle school. Consultative services at the high school are inadequate to meet the need of gifted students. Students are not being provided curricula and services based on their individual needs. There is a strong need for staff development, curricula, and increased staff for the gifted program at the elementary, middle, and high school levels. There is a severe need to address the under-representation of minority students in the gifted program.

Student Records and District Forms Reviews

Student Record Reviews: Students with Disabilities

A total of nine records of students with disabilities, including case study students were reviewed by Bureau staff. Records included three from the elementary school, three from the middle school and three from the high school. According to random monitoring guidelines, at least one student record identified as a cost factor 254 or 255 from each school was selected for review. A matrix review for each of those students was also conducted. The records were reviewed in the schools during the on-site visits.

Of the nine records reviewed, all were current at the time of the review, during the last full-time equivalent (FTE) survey, and during the federal funding count. Compliance with federal and state guidelines in the areas of reevaluations was noted on all records. However, some of the records contained instances of noncompliance that appeared to be of a systemic nature, as described below.

At the middle and high schools, three of the six records reviewed failed to indicate that the purpose of the meeting would be to discuss transition. All three of the students were at least 14 years old and had transition IEPs. In addition, four of the records at the middle and high schools did not contain parent notices that included all necessary participants. Parent participation notices failed to include a special education teacher, an agency representative for transition, and the student, when appropriate. In addition, in six of the records reviewed there was no indication that the parents received a copy of the procedural safeguards with the parent invitation/notice of meeting form.

All of the records at the middle and high school failed to provide progress reports for students with disabilities as often as nondisabled students receive progress reports. It was reported at Bradford Middle School that reports of progress toward annual goals are provided each nine weeks, but interim reports on progress toward goals are not provided. Students without disabilities receive academic progress reports every 4 ½ weeks, and students with disabilities do receive academic progress reports as often as other students.

Eight of the IEPs contained at least one goal that was not measurable. Of those, five did not have a majority of measurable goals. Goals such as “J will maximize independent functioning through technological adaptations” and “G will decrease behaviors that inhibit his social interaction” are not measurable. In addition, four of the IEPs contained short-term objectives that were not measurable or did not relate to the goal, or did not meet the minimum of two related objectives for each goal. For those IEPs that did not contain a majority of measurable

annual goals, the IEP team must be reconvened to address these shortcomings. A list of the individual students whose IEP teams will need to be reconvened will be provided under separate cover.

In the area of reporting how the student's disability affects participation and progress in the general curriculum, four of the records contained inadequate statements. These records either restated the needs of the students or described the disability. This statement needs to specify how the disability affects participation and progress in the general curriculum. Another area of concern involves the explanation of the extent to which the student will not participate with nondisabled peers. The district's least restrictive environment (LRE) form adequately provides this information, however, since this is no longer a required form, and it was not completed for all IEPs submitted, it was noted on two of the IEPs that the statement provided was inadequate. Listing the ESE classes or providing the placement of the student does not explain why the student does not participate with nondisabled peers.

Three matrices were reviewed during the Bradford County monitoring visit. One student was reported at the 254 cost factor, and two students were reported at the 255 cost factor. For the student reported as a 254, all indicators noted on the matrix were included in the IEP and there was supporting evidence from the classroom observation and teacher interview that indicated that the services were provided appropriately. There were reporting errors, however, for both of the students claimed as 255. For both students, the matrix totals equated to a 254 cost factor (21 points and 18 points respectively), but the students were reported at the 255 level. There was supporting evidence in the IEPs and in the classroom observations and interviews that the services indicated on the matrix (totaling the 254 cost factor) were provided to the student; however, the level of services was misrepresented to the state. This finding will result in fund adjustments of Florida Education Finance Program (FEFP) monies. The identities of these students will be provided under separate cover.

In addition to the systemic issues noted above, there was concern regarding documentation for one transfer student. As part of the case study process, a review of the student's IEP was conducted. It appeared that the student's IEP from the previous out-of-state district was reviewed upon his enrollment in Bradford County, and services, based on that IEP, were provided in a timely manner. The IEP team met a short time later, and developed a new IEP. However, the record review revealed several changes to the documents (i.e., meeting date, initiation date) that made it difficult to determine the actual timeline of events. In a conversation with a member of the monitoring team, district staff indicated that they were unsure whether accepting an out-of-state IEP, even on a temporary basis, was allowed by state or federal regulations.

One reviewed record was of a student whose placement was changed and the paperwork was incorrectly filled out. Several of the required components of an informed notice were not completed, yet there is indication that the parent did receive notice of a change of placement. Also, in the case of prior notice of change of placement, there was one student record that failed to include an informed notice of change of placement. The student's placement changed from resource level to regular classroom and there was no notice to indicate such change. This item of noncompliance will result in a federal fund adjustment for the district. The student will be identified under separate cover.

There were several instances of noncompliance in individual IEPs that did not appear to be systemic in nature. These individual findings for IEPs are as follows:

- lack of a second notice of IEP meeting to parents
- lack of appropriate members of IEP team in attendance at meeting
- lack of descriptive present level of educational performance
- lack of correspondence between goals, objectives, and identified needs in present level of performance
- consideration of the student's need for related services
- consideration of the student's need for supplementary aids and services
- inadequate explanation of the extent to which the student will not participate with nondisabled peers
- accommodations for state and district assessments not consistent with those provided in the classroom
- location of services not identified
- frequency of services and accommodations/modifications not identified or not specific
- inadequate procedures for measuring progress on goals
- lack of indication of how the parent will be informed of progress toward annual goals
- no indication that special factors were considered (concerns of parents, performance on state or district assessments, specially designed physical education)
- diploma option not identified for students at least 14 years of age
- no indication that the student at least 14 years old was invited to meeting
- no indication of transfer of rights
- transition domains not addressed or no statement to describe the basis for the determination that the services were not needed (related services specific to transition, development of employment, post-school employment, post-school adult living)
- no course of study identified beginning at age 14

In summary, systemic findings were identified in the development of measurable and appropriate annual goals, including short-term objectives and benchmarks. There were also systemic findings regarding parent notice, including failure to identify purpose of the meeting, failure to invite appropriate members of the team (including the student when appropriate) and failure to provide procedural safeguards with parent notice. Other systemic findings included inadequate statements of how the student's disability affects participation and progress in the general curriculum and the lack of interim progress reports related to annual goals. Two of the three cost factor matrices contained findings of inaccurate reporting. Individual findings for student records were noted in 18 areas, as noted above.

Student Record Reviews: Gifted

A total of five Educational Plans for gifted students were reviewed. Classroom visits were conducted for some of the students whose EPs were reviewed. Three of the records were from the elementary school, one from the middle school and one from the high school.

All EPs were current on the day of the review and during the last FTE survey. It was noted that all requirements for the notice of meeting were present, including description of the purpose of the meeting, time and location of the meeting, list of persons attending the meeting, and the

appropriate team members. However, there were some individual items of noncompliance on some records. Individual findings of noncompliance for EPs are as follows:

- unclear parent notification
- lapse of one EP (1/26/01-1/30/02)
- lack of clear present level of performance statements
- student not receiving services prescribed on the EP

In summary, there are no systemic findings related to compliance of EPs for gifted students.

District Forms Review

Forms representing the thirteen areas identified below were submitted to Bureau staff for a review to determine compliance with federal and state laws. Findings were noted on three of the forms. In addition, changes are required on three forms at the next printing. The district was notified of the specific findings via a separate letter dated June 7, 2002. An explanation of the specific findings may be found in appendix D.

- *Parent Notification of Individual Educational Plan (IEP) Meeting*
- *IEP Forms*
- *Notice and Consent for Initial Placement*
- *Informed Notice and Consent for Evaluation*
- *Informed Notice of Reevaluation*
- *Notification of Change of Placement*
- *Notification of Change of FAPE*
- *Informed Notice of Refusal*
- *Documentation of Staffing/Eligibility Determination**
- *Informed Notice of Dismissal**
- *Notice: Not Eligible for Exceptional Student Placement**
- *Summary of Procedural Safeguards*
- *Annual Notice of Confidentiality**

* indicates findings that require immediate attention

Special Categories Records Reviews

Four records were reviewed for appropriate dismissal procedures. One of the records indicated that the student continued to be reported as a student with disabilities on two subsequent FTE counts. Dismissal occurred on 4/26/01 and the student was counted on the October 2001 and February 2002 FTE counts as an ESE student.

Three records of students referred for evaluation but determined ineligible for special programs were reviewed for appropriate procedures. The district was not out of compliance in any areas.

One record of a student identified as Limited English Proficient (LEP) was reviewed. The district was in compliance on all necessary components.

Three records of students who transitioned from Part C to Part B programs were reviewed. For all three records, there was no indication that a local education agency (LEA) representative

from the district attended the transition planning meetings. There is evidence that one of the students was not served by the district until four months after his third birthday. The district is cited to be out of compliance for these two items.

Three records of students who were temporarily assigned were reviewed. For one out-of-state student, there was no documentation that a staffing committee met to determine the student was eligible for temporary assignment in an ESE program. The student was a transfer student who had a current IEP from his transferring school. There is documentation that the IEP team met to develop an IEP, however, there is no indication that it was a temporary IEP, nor that the parent gave consent or was provided notice about the placement.

Initial eligibility and placement procedures were reviewed for three students. For one of the students, the vision, hearing, and speech and language screenings were all over ten years old. This student was determined eligible for SLD but the sensory screenings were not current. The multidisciplinary report indicated that the committee was unable to determine that the learning problems were not due to other disabling conditions. It was also noted on this record that prereferral interventions were attempted, but dates were not documented. On the record reviewed for the second student, it was noted that the prereferral interventions were attempted, but the dates of those interventions were not provided. A third initial placement record indicated that the notes in the daily planner were used as a conference. This does not constitute one of the required conferences with the parent.

Federal funds will be adjusted for one student due to the lack of a second parent conference prior to initial eligibility and for one student due to the lack of prior notice of change of placement. Florida Education Finance Program (FEFP) funds will be adjusted for two students due to inaccurate reporting of matrix cost factors to the state. The name of the students will be provided under separate cover.

In summary, findings in the area of special categories were noted in

- appropriate dismissal procedures
- transition from Part C to Part B programs
- temporary placements
- initial eligibility

Summary

Based on the findings described in this report and summarized in appendix E, the district is expected to develop system improvement plan in collaboration with Bureau staff. This plan should specify activities and strategies to address the identified findings in the following areas:

- General Supervision
- Assessment
- Behavior/Discipline
- Curriculum and Instruction
- Least Restrictive Environment
- Post-School Transition
- Pre-K/Transition from Part C to Part B Programs
- Parent Involvement
- Gifted
- Student Records and District Forms Reviews

Following is a summary of the findings in each of the identified areas that requires an improvement plan, as well as a format for completion of the system improvement plan.

Bradford County School District Random Monitoring System Improvement Plan

This section includes the issues identified by the Bureau as most significantly in need of improvement. The district is required to provide system improvement strategies to address identified findings, which may include a explanation of specific activities the district has committed to implementing, or it may consist of a broader statement describing planned strategies. For each issue, the plan also must define the measurable evidence of whether or not the desired outcome has been achieved. Target dates that extend for more than one year should include benchmarks in order to track interim progress. Findings identified as “ESE” are those findings that reflect issues specific to ESE students. Findings identified as “All” are those findings that reflect issues related to the student population as a whole, including ESE students.

Category	Findings	ESE	All	System Improvement Strategy	Evidence of Change (Including target date)
General Supervision	1. There is a need for training of teachers in skill areas related to effectively providing instruction for all students, including the use of instructional accommodations.		X	<p>Provide training for teachers in effective instruction for all students including the use of instructional accommodations.</p> <ul style="list-style-type: none"> -Training for ESE teachers in effective consultation techniques. -Planning and implementing an effective consultative plan for all teachers (i.e., schedules, etc.). -Monthly consultation logs with specific due date to district office. -Implementing a tracking system to ensure consultation and accommodations occur. This will include distribution of IEP and modification/accommodations to all 	<p>-District ESE Director will randomly visit 10 classrooms to observe instructional accommodations and modifications compared to student’s IEPs.</p> <p>Timeline: 06/03 and 06/04</p> <p>-District ESE Director will review monthly consultation logs and tracking system for ESE students and compare to IEPs.</p> <p>Timeline: 06/03 and 06/04</p>

Category	Findings	ESE	All	System Improvement Strategy	Evidence of Change (Including target date)
General Supervision (cont.)				involved teachers, teacher to teacher consultation, and teacher to student consultation. -Training in effective instruction for ESE students with emphasis on understanding students' strengths and weaknesses as well as accommodations to meet those needs.	Report of self-assessment of general supervision of students with IEPs reveals 100% compliance in the use of accommodations and monthly consultation. Timeline: 06/03 and 06/04
	2. There is a need for a system of tracking the academic and behavioral performance of students with disabilities who are pursuing a special diploma.	X		-Develop and implement a system of tracking academic and behavioral performance of students with disabilities who are pursuing a special diploma.	Copy of tracking system submitted to Bureau. Timeline: 06/03 Report of self-assessment in the use of the tracking system indicates 100% implementation. Timeline: 06/04
	3. There is a need for a clear designation at the district level regarding the roles and responsibilities for special program areas such as DJJ,			X	-Develop specific criteria for roles and responsibilities of ESE teacher (specific to individual program), alternative school teachers, gifted teachers, and implementation of 504 requirements. -Provide specifically defined roles to principal and teachers.

Category	Findings	ESE	All	System Improvement Strategy	Evidence of Change (Including target date)
General Supervision (cont.)	basic education classes at the alternative school, gifted programs, and Section 504 requirements.				
Assessment	4. Accommodations do not appear to be based on the individual needs of students.	X		Strategies addressed in item #1.	Evidence of Change addressed in item #1.
	5. Teachers at the high school do not consistently use the accommodations identified on individual student's IEPs.	X		Strategies addressed in item #1.	Evidence of Change addressed in item #1.

Category	Findings	ESE	All	System Improvement Strategy	Evidence of Change (Including target date)
Behavior/ Discipline	6. In many schools there is a need for a consistent comprehensive school-wide discipline plan, including an array of in-school interventions that employ positive behavioral supports.		X	<p>Develop school-wide discipline plans including an array of in-school interventions that employ positive behavioral supports.</p> <p>-Training in developing discipline plans to include positive behavioral supports.</p> <p>Develop a district discipline plan for ESE students to be included in the district's discipline plan. Provide copies to all stakeholders.</p> <p>-Training for all district staff in the procedures for disciplining ESE students.</p>	<p>Plans submitted to Bureau Timeline: 06/03</p> <p>Baseline Data: School Year 2001-2002</p> <p>Elementary K-5 7.1% ISS 3.9% OSS Middle School 6-8 34.7% ISS 17% OSS High School 9-12 32.1% ISS 12.1% OSS</p> <p>-Data compiled 06/04 will show evidence of decrease in ISS and OSS percentage in elementary, middle and high schools. Data submitted to Bureau.</p> <p>In 2003-2004 Elementary ISS decrease to 7.0% OSS decrease to 3.7% Middle ISS decrease to 34.5% OSS decrease to 16.0% High ISS decrease to 32% OSS decrease to 12%</p> <p>Timeline: 06/04</p>

Category	Findings	ESE	All	System Improvement Strategy	Evidence of Change (Including target date)
Behavior/ Discipline (cont.)	7. Classroom teachers are not involved in the FBA process, do not participate in the development of BIPs, and do not implement BIPs	X		<p>Involve classroom teachers as well as ESE students in the FBA process and the development of BIPs.</p> <p>-Training for all teachers in developing effective BIPs and completing FBAs.</p> <p>-Develop a procedure to ensure that all appropriate persons have copies of BIPs for implementation.</p>	<p>-District staff will randomly monitor 10 records and classrooms of students in need of FBAs and BIPs. Report of random self- assessment will show 100% implementation of BIPs for these ESE students. Timeline: 06/03 and 06/04</p> <p>-Provide list of teachers who have been trained in Behavioral Intervention Plans / Functional Behavioral Assessment. Timeline: 06/03 and 06/04</p>
Curriculum and Instruction	8. There is a need for a structured and comprehensive curricular scope and sequence at the high school level for students with disabilities.	X		<p>Using the course descriptions for ESE students, develop a curricular scope and sequence for high school ESE students.</p> <p>-Select a curriculum committee to develop a scope and sequence.</p> <p>-Include the scope and sequence in the Pupil Progression Plan.</p> <p>-Include the courses required for graduation for each diploma option on the diploma choice form for parent and student to sign.</p>	<p>-Copies of ESE curriculum will be provided to the Bureau Timeline: 06/03</p>

Category	Findings	ESE	All	System Improvement Strategy	Evidence of Change (Including target date)
Least Restrictive Environment	9. Adaptive physical education must be provided for students with disabilities who require this service.	X		<p>Provide adaptive physical education for ESE students who require this service.</p> <p>-Investigate requirements and guidelines for “specially designed physical education”</p> <p>-Employ adaptive P.E. consultant or teacher.</p> <p>-Send selected physical education teachers to training in providing this service.</p> <p>-Implement adaptive physical education where needed.</p>	<p>-District report of self-assessment indicates that all ESE students who are warranted adaptive physical education received those services or an alternate approved plan.</p> <p>Timeline: 06/03 and 06/04</p>
Post-School Transition	10. There is a need for effective transition services for students with disabilities, including interagency agreements.	X		<p>-Set up contracts with 2-3 interagencies to provide students with several post-school options.</p> <p>-Begin process with student in 10th grade to determine which agency best fits student’s wants and needs.</p>	<p>-Send contract(s) to Bureau</p> <p>Timeline: 06/03</p> <p>-Copy of Parent Participation Form and Transitional Plan will be provided to DOE.</p> <p>Timeline: 06/03</p>
Pre-K/ Part C to Part B Transition	No significant findings.				

Category	Findings	ESE	All	System Improvement Strategy	Evidence of Change (Including target date)
Parent Involvement	No significant findings.				
Gifted	11. There is a need for staff development, curricula, and increased staff for the gifted program at the elementary, middle, and high school levels.		X	<p>Provide staff development, curricula, and increased staff for gifted all levels.</p> <p>-Form a committee to preview and research effective gifted curricula and materials at all levels.</p> <p>-Select members to visit effective programs on-site.</p> <p>- Request additional staff to provide more teachers to serve gifted students.</p> <p>-Provide staff development for gifted teachers in effective practices, techniques and challenges of serving gifted students.</p> <p>-Provide gifted screenings to all children in K, 1st and 2nd to give equal opportunity to all students.</p> <p>-Grades 3+ should be tested/screened by referral only.</p>	<p>-Provide list of staff development on gifted.</p> <p>Timeline: 06/03 and 06/04</p> <p>-Copy of district curriculum.</p> <p>Timeline: 06/03</p> <p>-Listing of persons responsible for gifted services.</p> <p>Timeline: 06/03 and 06/04</p>
	12. Racial and ethnic minority students are under-represented in the gifted program.		X	<p>Addressed in the district gifted continuous improvement/monitoring plan.</p> <p>-Use gifted checklist district-wide in grades 1 and 2.</p> <p>-Use alternate screening and evaluations for appropriate population.</p>	<p>-Referral data generated from district-wide checklists.</p> <p>Timeline: 06/03 and 06/04</p> <p>-Data reported in CIMP</p>

Category	Findings	ESE	All	System Improvement Strategy	Evidence of Change (Including target date)
Records and Forms Reviews	<p>13. Six areas of non-compliance were found to be systemic in nature:</p> <ul style="list-style-type: none"> • lack of measurable annual goals and objectives • failure to identify the purpose of the meeting • failure to invite appropriate team members • failure to provide procedural safeguards with parent notice • inadequate statements regarding the effects of the disability • lack of interim progress reports 	X		<p>-Intensive training of teachers and paraprofessionals on IEP development, scheduling of meetings, and general procedures.</p> <p>-Develop standard checklist for checking IEPs at district level and returning to teachers for correction.</p>	<p>-District staff will conduct a random check of 10-20 IEPs to check for compliance. Report of district self-assessment indicates that systemic areas of non-compliance were in 100% compliance. Timeline: 06/03 and 06/04</p> <p>-Copy of district checklist submitted to Bureau. Timeline: 06/03</p>

Category	Findings	ESE	All	System Improvement Strategy	Evidence of Change (Including target date)
Records and Forms Reviews (cont.)	14. Cost factor matrices are not consistently reported correctly.	X		<p>-Provide intensive matrix training.</p> <p>-Appoint someone at the district level to review matrix and IEP to make sure both documents reflect services being rendered.</p> <p>-Develop procedure for determining that matrix cost factors are reported correctly to MIS.</p>	<p>-ESE Director or designee will conduct 5 random visits to classrooms of students who are identified as cost factor of 254 or 255 and will review all 254 and 255 matrices as well as the MIS data on these matrices.</p> <p>-Report of self-assessment indicates that services indicated on matrices were reflected in the IEPs and in the classroom and were reported correctly to MIS.</p> <p>Timeline: 06/03 and 06/04</p>
	<p>15. Findings were reported in the following special category areas:</p> <ul style="list-style-type: none"> • dismissal procedures • transition from Part B to Part C • temporary placement • initial eligibility 	X		<p>-Provide intensive training on staffings.</p> <p>-Should include dismissal procedures, transition from Part C to Part B, temporary placement, and initial eligibility.</p> <p>-Provide teachers with a chart listing types of staffing and specific procedures for easy reference.</p>	<p>-Random check of 10 ESE records using DOE checklist. Report of self-assessment reveals 100% compliance with dismissal procedures, transition from Part C to Part B, temporary placement, and initial eligibility.</p> <p>Timeline: 06/03 and 06/04</p> <p>-Provide flow chart to Bureau.</p> <p>Timeline: 06/03</p>

Appendix A- Survey Results

**2002 Parent Survey Report
Students with Disabilities
Bradford County**

Responding to the need to increase the involvement of parents and families of students with disabilities in evaluating the educational services provided to their children, the Florida Department of Education, Bureau of Instructional Support and Community Services contracted with the University of Miami to develop and administer a parent survey in conjunction with the Bureau’s district monitoring activities. In 1999, the parent survey was administered in 12 districts; in 2000, it was administered in 15 districts and two special schools; and, in 2001, it was administered in four districts.

In conjunction with the 2002 Bradford County monitoring activities, the parent survey was sent to parents of the 938 students with disabilities for whom complete addresses were provided by the district. A total of 160 parents (PK, n=6; K-5, n=83; 6-8, n=36; 9-12, n=35) representing 17% of the sample, returned the survey. 124 surveys were returned as undeliverable, representing 13% of the sample.

Parents responded “yes” or “no” to each survey item, indicating that they either agreed or disagreed with the statement. The district response for each item was calculated as the percentage of respondents who agreed with the item.

	% Yes
1. Overall, I am satisfied with the exceptional education services my child receives.	81
2. Overall, I am satisfied with my child's academic progress.	77
3. Overall, I am satisfied with the amount of time my child spends with regular education students.	89
4. Overall, I am satisfied with the effect of exceptional student education on my child's self-esteem.	78
5. Overall, I am satisfied with the level of knowledge and experience of school personnel.	87
6. Overall, I am satisfied with the way I am treated by school personnel.	90
7. Overall, I am satisfied with the way special education teachers and regular education teachers work together.	83
8. Overall, I am satisfied with how quickly services are implemented following an IEP (Individualized Educational Plan) decision.	82
9. My child is usually happy at school.	85
10. My child spends most of the school day involved in productive activities.	80
11. My child has friends at school.	93

	%
12. My child is learning skills that will be useful later on in life.	87
13. My child is aiming for a standard diploma.	92
14. At my child's IEP meetings we have talked about ways that my child could spend time with students in regular classes.	74
15. At my child's IEP meetings we have talked about whether my child needed services beyond the regular school year.	62
16. At my child's IEP meetings we have talked about which diploma my child may receive.*	48
17. At my child's IEP meetings we have talked about the requirements for different diplomas.*	37
18. At my child's IEP meetings we have talked about whether my child would take the FCAT (Florida Comprehensive Assessment Test).	57
19. At my child's IEP meetings we have talked about whether my child should get accommodations (special testing conditions), for example, extra time.	72
20. My child's teachers set appropriate goals for my child.	87
21. My child's teachers expect my child to succeed.	93
22. My child's teachers give homework that meets my child's needs.	73
23. My child's teachers call me or send me notes about my child.	79
24. My child's teachers are available to speak with me.	93
25. My child's teachers give students with disabilities extra time or different assignments, if needed.	82
26. My child's school wants to hear my ideas.	86
27. My child's school encourages me to participate in my child's education.	89
28. My child's school informs me about all of the services available to my child.	72
29. My child's school addresses my child's individual needs.	81
30. My child's school makes sure I understand my child's IEP.	86
31. My child's school explains what I can do if I want to make changes to my child's IEP.	76
32. My child's school sends me information written in a way I understand.	82
33. My child's school sends me information about activities and workshops for parents.	55
34. My child's school encourages acceptance of students with disabilities.	83
35. My child's school involves students with disabilities in clubs, sports, or other activities.	69

	%
36. My child's school provides students with disabilities updated books and materials.	71
37. My child's school offers a variety of vocational courses, such as computers and business technology.*	73
38. My child's school provides information to students about education and jobs after high school.*	52
39. My child's school does all it can to keep students from dropping out of school.	77
40. My child's school offers students with disabilities the classes they need to graduate with a standard diploma.	78
41. I have attended one or more meetings about my child during this school year.	94
42. I participate in school activities with my child.	77
43. I am a member of the PTA/PTO.	18
44. I belong to an organization for parents of students with disabilities.	11
45. I have used parent support services in my area.	21
46. I am comfortable talking about my child with school staff.	96
47. I attend School Advisory Committee meetings concerning school improvement.	27

Appendix B- ESE Monitoring Team Members

**Bradford County
Random Monitoring Visit
May 20-23, 2002**

ESE Monitoring Team Members

Department of Education Staff

Iris Anderson, Program Specialist IV, Program Administration and Evaluation

Gail Best, Program Specialist IV, Program Administration and Evaluation

Kelly Claude, Program Specialist IV, Program Administration and Evaluation

Lee Clark, Program Specialist IV, Program Administration and Evaluation

Kim Komisar, Program Specialist IV, Program Administration and Evaluation

Donnajo Smith, Program Specialist IV, Program Development and Services

Appendix C- Glossary of Acronyms

Glossary of Acronyms

AP	Advanced Placement
ARC	Association for Retarded Citizens
BIP	Behavior Intervention Plan
Bureau	Bureau of Instructional Support and Community Services
CCC	Computer Curriculum Corporation
CHRIS	Children's Registry Information System
CMS	Children's Medical Services
CST	Child Study Team
DEI	Developmental Early Intervention
DJJ	Department of Juvenile Justice
DOE	Department of Education
EH	Emotionally Handicapped
EMH	Educable Mentally Handicapped
EP	Educational Plan
ESE	Exceptional Student Education
ESY	Extended School Year
FAPE	Free Appropriate Public Education
FBA	Functional Behavioral Assessment
FCAT	Florida Comprehensive Assessment Test
FDLRS	Florida Diagnostic and Learning Resources System
FEFP	Florida Education Finance Program
FRI	Florida Reading Initiative
FTE	Full Time Equivalent
IDEA	Individuals with Disabilities Education Act
IEP	Individual Educational Plan
ISS	In-School Suspension
K-BIT	Kaufman Brief Intelligence Test
LCCE	Life Centered Career Education
LEA	Local Education Agency
LEP	Limited English Proficient
LRE	Least Restrictive Environment
OSS	Out-of-School Suspension
Pre-K(PK)	Prekindergarten
PASS-D	Performance Assessment System for Students with Disabilities
PTO	Parent Teacher Organization
RJE	Robinson, Jenkins, Ellerson
SAC	School Advisory Committee
SED	Severely Emotionally Disturbed
SLD	Specific Learning Disability
SP&P	Special Program and Procedures for Exceptional Students
SRA	Science Research Associates
STOP	Short Term Offender Program

Appendix D- Forms Review

**Bradford County
Random Monitoring Report
Forms Review**

This forms review was completed as a component of the random monitoring visit conducted on May 20-23, 2002. The following district forms were compared to the requirements of applicable State Board of Education rules, the Individuals with Disabilities Education Act (IDEA), applicable sections of Part 300, Code of Federal Regulations, and the Monitoring Work Papers/Source Book for 2002. The review includes recommended revisions based on programmatic or procedural issues and concerns. The results of the review are detailed below and list the applicable sources used for the review.

Parent Notification of IEP Meeting

Form GibCo Dynamo Version *Notification of Meeting Form*
Source Book/Work Paper - IEP
Title 34 of the Code of Federal Regulation Section 300.345

This form contains the components for compliance.

The following comment is made regarding this form.

There is no legal requirement that indicates that the parents must inform the district of people that they intend to bring to the IEP meeting.

Individual Educational Plan (IEP) Meeting

Form 0600 Rev. 07/01 *Individual Educational Plan*
Source Book/Work Paper - IEP
Title 34 of the Code of Federal Regulation Section 300.347

This form contains the components for compliance.

Notice and Consent for Initial Placement

Form GibCo Dynamo Version *Informed Notice and Consent for Initial Placement*
Source Book/Work Paper - Program Areas
Title 34 of the Code of Federal Regulation Sections 300.503 and 300.505

This form contains the components for compliance.

Informed Notice and Consent for Evaluation

Form GibCo Dynamo Version *Informed Notice and Consent for Evaluation*
Source Book/Work Paper - Evaluation
Title 34 of the Code of Federal Regulation Sections 300.503 and 300.505

This form contains the components for compliance.

Informed Notice of Reevaluation

Form GibCo Dynamo Version *Informed Notice and Consent for Reevaluation*
Source Book/Work Paper - Reevaluation
Title 34 of the Code of Federal Regulation Sections 300.503 and 300.505

This form contains the components for compliance.

Notification of Change in Placement (and identification, FAPE)

Form *Notice of Change in Placement or Provision of a Free Appropriate Public Education (FAPE)*
Source Book/Work Paper - IEP
Title 34 of the Code of Federal Regulation Section 300.503

This form contains the components for compliance.

Informed Notice of Refusal

Form *Notice of Change in Placement or Provision of a Free Appropriate Public Education*
Source Book/Work Paper - IEP
Title 34 of the Code of Federal Regulation Section 300.503

This form contains the components for compliance. It is noted that this form is only appropriate for the three circumstances detailed on the form. There are other circumstances when you may need to provide a parent with a notice of refusal.

Notice: Not Eligible for Exceptional Student Placement

Form GibCo Dynamo Version *Informed Notice of Ineligibility or Dismissal*
Source Book/Work Paper - Ineligible, Dismissal
Title 34 of the Code of Federal Regulation Section 300.503

The following must be addressed.

On this form, the wording “approved” and “disapproved” must be changed to “reviewed.” This change conforms to the requirement identified in the most recent Special Programs and Procedures for Exceptional Students (SP&P) document.

Notice: Informed Notice of Dismissal

Form GibCo Dynamo Version *Informed Notice of Ineligibility or Dismissal*
Source Book/Work Paper - Dismissal
Title 34 of the Code of Federal Regulation Section 300.503

The following must be addressed.

- On this form, the wording “approved” and “disapproved” must be changed to “reviewed.” This change conforms to the requirement identified in the most recent Special Programs and Procedures document.

The following comment is made regarding this form.

- The section of the form that identifies dismissal as a result of a staffing committee could only be used for students identified as gifted. Since the reevaluation process must be used for students with disabilities prior to dismissal, and this process is the obligation of the IEP team, a decision regarding dismissal must be the result of the IEP meeting.

Documentation of Staffing/Eligibility Determination

Form GibCo Dynamo Version *Staffing Committee Process Documentation*
Source Book/Work Paper - Staffing, IEP
Title 34 of the Code of Federal Regulation Section 300.534

The following must be addressed.

- On this form, the wording “approved” and “disapproved” must be changed to “reviewed.” This change conforms to the requirement identified in the most recent Special Programs and Procedures document.

Confidentiality of Information

Form *Annual Notice of Confidentiality*
Source Book/Work Paper - Confidentiality of Information
Family Educational Rights and Privacy Act, Part 99 Title 34 of the Code of Federal Regulation Title 34 of the Code of Federal Regulation Section 300.503

The following must be addressed.

- The information you sent us regarding confidentiality of student records is missing several components. As written, this form fails to correctly describe the rights of the parent or adult student. A copy of the checklist used to review this information is attached.