PUTNAM COUNTY

Focused Monitoring

Exceptional Student Education Programs

September 25-28, 2006

Florida Department of Education
Bureau of Exceptional Education and Student Services
ESE Program Administration and Quality Assurance
This is one of many publications available through the Bureau of Exceptional Education and Student Services, Florida Department of Education, designed to assist school districts, state agencies which support educational programs, and parents in the provision of special programs. For additional information on this publication, or for a list of available publications, contact the Clearinghouse Information Center, Bureau of Exceptional Education and Student Services, Florida Department of Education, Room 628, Turlington Bldg., Tallahassee, Florida 32399-0400.

telephone: (850) 245-0477

FAX: (850) 245-0987

Suncom: 205-0477

e-mail: cicbicsc@fldoe.org

website: http://myfloridaeducation.com/commhome/
May 22, 2007

Mr. David Buckles, Superintendent
Putnam County School District
200 South Seventh Street
Palatka, Florida 32177-4615

Dear Superintendent Buckles:

We are pleased to provide you with the Final Report of Focused Monitoring of Exceptional Student Education Programs in Putnam County. This report was developed by integrating multiple sources of information, including: student record reviews; interviews with school and district staff; information from focus groups; and parent survey data from our visit on September 25-28, 2006. The final report will be placed on the Bureau of Exceptional Education and Student Services’ website and may be viewed at www.firn.edu/doe/commhome/mon-home.htm.

The report includes a system improvement plan outlining the findings of the monitoring team. Bureau staff have worked with Evelyn Langston, ESE Director, and her staff to develop a system improvement plan that includes strategies and activities to address the areas of concern and noncompliance identified in the report. We anticipate that some of the action steps that will be implemented will be long term in duration, and will require time to assess the measure of effectiveness. The system improvement plan has been approved and is included as a part of this final report.

The first scheduled update on the system improvement plan will be due on November 30, 2007. The Department of Education must ensure timely corrections on noncompliance within one year of reporting to the district. The successful completion of improvement plan activities and the submission of the annual report no later than May 7, 2008, will be required. A verification monitoring visit to your district may take place after review of the annual report.
If my staff can be of any assistance as you implement the system improvement plan, please contact Eileen L. Amy, ESE Program Administration and Quality Assurance Administrator. Ms. 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 Putnam County.

Sincerely,

Bambi J. Lockman, Chief
Bureau of Exceptional Education and Student Services

Enclosure

cc: C. L. Overturf, Jr., School Board Chair
    Members of the School Board
    James Pagett, School Board Attorney
    School Principals
    Evelyn Langston, ESE Director
    Eileen L. Amy
    Ginny Chance
PUTNAM COUNTY
Focused Monitoring

Exceptional Student Education Programs

September 25-28, 2006

Florida Department of Education
Bureau of Exceptional Education and Student Services
ESE Program Administration and Quality Assurance
# Table of Contents

Monitoring Process .................................................................................................................................. 1  
Authority ............................................................................................................................................. 1  
State Performance Plan and Monitoring ............................................................................................ 1  
Indicator Selection ............................................................................................................................... 2  
Background Information and Demographics ....................................................................................... 2  
Monitoring Activities .......................................................................................................................... 3  

Reporting of Information ..................................................................................................................... 4  
Parent Surveys ..................................................................................................................................... 4  
Student Record Reviews ....................................................................................................................... 5  
On-site Monitoring Activities .............................................................................................................. 6  

Reporting Table .................................................................................................................................. 9  
Curriculum/Instruction (Standard Diploma) ........................................................................................... 9  
Performance on Statewide Assessment ............................................................................................... 9  
Disproportionate Representation – EMH ............................................................................................ 10  
LRE – 6-21 ........................................................................................................................................ 10  
Dropout ............................................................................................................................................... 11  
Secondary Transition .......................................................................................................................... 11  
Gifted .................................................................................................................................................. 12  
Matrix of Services .............................................................................................................................. 12  
Student Record Reviews .................................................................................................................... 12  
Forms Review ..................................................................................................................................... 12  

System Improvement Plan ................................................................................................................... 13  

Promising Practices, Recommendations and Technical Assistance ................................................... 13  
Promising Practices ............................................................................................................................. 13  
Recommendations ............................................................................................................................... 13  
Technical Assistance .......................................................................................................................... 14  

System Improvement Strategies ......................................................................................................... 15  

Appendix A: ESE Monitoring Team Members .................................................................................... 21
Monitoring Process

Authority

The Florida Department of Education, Bureau of Exceptional Education and Student Services, in carrying out its roles of leadership, resource allocation, technical assistance, monitoring, and evaluation is required to oversee the performance of district school boards in the enforcement of all laws and rules (Sections 1001.03(8) and 1008.32, Florida Statutes (F.S.)). In fulfilling this requirement, the Bureau conducts monitoring activities of the exceptional student education (ESE) programs provided by district school boards, in accordance with Sections 1001.42 and 1003.57, F.S. Through these monitoring activities, the Bureau examines and evaluates procedures, records, and ESE programs; provides information and assistance to school districts; and otherwise assists school districts in operating effectively and efficiently. One purpose of the Individuals with Disabilities Education Act of 2004 (IDEA 2004) is to assess and ensure the effectiveness of efforts to educate children with disabilities (Section 300.1(d) of Title 34, Code of Federal Regulations (CFR), and districts are required to make a good faith effort to assist children with disabilities to achieve their stated goals and objectives in the least restrictive environment (34 CFR §300.350(a)(2) and §300.556). In accordance with the IDEA 2004, the Department is responsible for ensuring that the requirements of the IDEA are carried out and that each educational program for children with disabilities administered in the state meets the educational requirements of the state (34 CFR §300.600(a)(1) and (2)). Federal Regulations for IDEA 2004 were made public on August 14, 2006, and implementation required on October 13, 2006.

The monitoring system reflects the Department’s commitment to provide assistance, service, and accountability to school districts, and is designed to emphasize improved educational outcomes for students while continuing to conduct those activities necessary to ensure compliance with applicable federal laws and regulations and state statutes and rules. In addition, these activities serve to ensure implementation of corrective actions, such as those required subsequent to monitoring by the U.S. Department of Education (USDOE), Office of Special Education Programs (OSEP), and by the Office for Civil Rights (OCR), as well as other quality assurance activities of the Department.

State Performance Plan and Monitoring

In accordance with 34 CFR 300.600(a)(1), not later than one (1) year after the date of enactment of the Individuals with Disabilities Education Act of 2004, each state must have in place a performance plan that evaluates the state’s efforts to implement the requirements and purposes of Part B and describe how the state will improve such implementation. The purpose of the monitoring process is to implement a methodology that targets the Bureau’s monitoring
intervention on key data indicators identified as significant for educational outcomes for students. Through this process, the Bureau uses data to inform the monitoring process, thereby implementing a strategic approach to intervention and commitment of resources that will improve student outcomes. A detailed description of the Bureau’s monitoring processes is provided in *Focused Monitoring and Verification Monitoring: Work Papers and Source Book for Exceptional Student Education Programs (2006-07)*. The protocols used by Bureau staff when conducting procedural compliance reviews are available in *Compliance Manual: Work Papers and Source Book for Exceptional Student Education Programs (2006-07)*. These documents are available on the Bureau’s website at [www.firn.edu/doe/commhome/mon-home.htm](http://www.firn.edu/doe/commhome/mon-home.htm).

**Indicator Selection**

In its continuing effort to focus the monitoring process on student educational outcomes, there are three (3) specific monitoring priority areas which are identified in the IDEA 2004 at section 616(a)(3). The first priority is the provision of a free appropriate public education (FAPE) in the least restrictive environment (LRE) which includes standard diploma rate, dropout rate, participation and performance on statewide assessments, suspension and expulsion, LRE for both ages 6-21 and for ages 3-5, PK outcomes, and parent satisfaction. The second priority is general supervision by the state which includes child find, transition (Part C to Part B), secondary transition, and postsecondary outcomes. The third priority is disproportionate representation of racial and ethnic groups in special education and related services including all disabilities in general and specific disability categories. The IDEA 2004 can be viewed on the web at [http://www.ed.gov/policy/speced/guid/idea/idea2004.html](http://www.ed.gov/policy/speced/guid/idea/idea2004.html).

Data on all State Performance Plan (SPP) indicators used to determine the focus of this on-site visit was based on a review of data from the 2006 local educational agency (LEA) Profile that was submitted electronically to the Department of Education (DOE) Information Database for Surveys 2, 3, 5, 9, and from the assessment files for each school year. This data is compiled into an annual data profile for each district. The 2006 LEA Profiles for all Florida school districts are available on the web at [http://www.firn.edu/doe/commhome/datapage.htm](http://www.firn.edu/doe/commhome/datapage.htm).

**Background Information and Demographics**

During the week of September 25, 2006, the Florida Department of Education, Bureau of Exceptional Education and Student Services, conducted an on-site review of the exceptional student education (ESE) programs in Putnam County Public Schools. Evelyn Langston, Exceptional Student Education Director, served as the coordinator and point of contact for the district during the monitoring visit. Putnam County was monitored on the following indicators: students exiting with a standard diploma via the FCAT Waiver, transition/post school outcomes, dropout, LRE 6-21 and standard diploma rate. In addition, data on over-representation of EH/EMH and on the under-representation of students identified as gifted was also reviewed.

Based on the 2006 LEA Profile, Putnam County School District has a total school population (PK-12) of 12,274: 18% of students being identified as students with disabilities; 2% identified as speech impaired as the primary exceptionality; and 3% identified as gifted. Putnam County is considered a “small/medium size” district and is comprised of 10 elementary schools, (ten Pre-K
to 5 and one Pre-K to 3), 1 intermediate school (4-6), 4 middle schools, 4 Jr./Sr. high schools
(one 7-12, one 11-12, and two 9-12) and 1 combined school (Pk-12). The district has one charter
school and no DJJ centers.

Putnam County is a rural community, with 47% of students on free or reduced lunch and less
than 1% of students identified as limited English proficient. Of the students with disabilities who
exited from the district during the 2004-05 school year, 21% met all requirements for a standard
diploma, 18% met the requirements through a waiver of a passing score on the Florida
Comprehensive Assessment Test (FCAT), and 2% graduated through the General Educational
Development diploma (GED) exit option (i.e., under-credited students who have passed the
FCAT and who pass the GED examination). The district has a dropout rate of 4% for all students
and a dropout rate of 9% for students with disabilities as stated on the LEA Profile. One percent
of the population of students with disabilities received out-of-school suspensions or expulsions
totaling more than ten days.

**Monitoring Activities**

The Bureau conducted the on-site focused monitoring visit from September 25-28, 2006. Four
Bureau staff members and nine peer monitors conducted site-visits to the following eight
schools:

- Palatka High School
- Interlachen High School
- Crescent City Jr./Sr. High School
- Robert H. Jenkins Jr. Middle School
- C. H. Price Middle School
- River Breeze Elementary School
- James A. Long Elementary School
- Children’s Reading Center Charter School

Peer monitors are exceptional student personnel from other school districts who are trained to
assist with the DOE’s monitoring activities. A listing of Bureau staff and peer monitors who
conducted the monitoring activities for this visit is included as appendix A.

The monitoring process includes interviews with administrators, teachers, and other service
delivery providers, focus group interviews with students, case studies, classroom observations,
record reviews, and parent surveys. A summary of the monitoring activities conducted in Putnam
County is included in the table below.

<table>
<thead>
<tr>
<th>Activity</th>
<th>Source</th>
<th>Number</th>
</tr>
</thead>
<tbody>
<tr>
<td>Interviews</td>
<td>District staff</td>
<td>9</td>
</tr>
<tr>
<td></td>
<td>School staff</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• School administrators/non-instructional</td>
<td>25</td>
</tr>
<tr>
<td></td>
<td>support</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• ESE teachers—disabilities</td>
<td>20</td>
</tr>
<tr>
<td></td>
<td>• ESE teachers—gifted</td>
<td>1</td>
</tr>
<tr>
<td></td>
<td>• General education teachers</td>
<td>24</td>
</tr>
<tr>
<td></td>
<td>Total</td>
<td>79</td>
</tr>
<tr>
<td>Activity</td>
<td>Source</td>
<td>Number</td>
</tr>
<tr>
<td>---------------------</td>
<td>--------------------------------------------------</td>
<td>--------</td>
</tr>
<tr>
<td>Focus Groups</td>
<td>Palatka High School—grades 9-12</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Students pursuing special diploma</td>
<td>15</td>
</tr>
<tr>
<td></td>
<td>Students pursuing standard diploma</td>
<td>17</td>
</tr>
<tr>
<td></td>
<td>Total</td>
<td>32</td>
</tr>
<tr>
<td>Case studies</td>
<td>Individual student case studies</td>
<td>19</td>
</tr>
<tr>
<td>Classroom Visits</td>
<td>ESE and general education classrooms</td>
<td>30</td>
</tr>
<tr>
<td>Record Reviews</td>
<td>IEPs</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Full desk-review</td>
<td>57</td>
</tr>
<tr>
<td></td>
<td>Targeted on-site review</td>
<td>137</td>
</tr>
<tr>
<td></td>
<td>EPs</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Full desk-review</td>
<td>5</td>
</tr>
<tr>
<td></td>
<td>Targeted on-site review</td>
<td>5</td>
</tr>
<tr>
<td></td>
<td>Matrix Reviews</td>
<td>6</td>
</tr>
<tr>
<td></td>
<td>Total</td>
<td>210</td>
</tr>
<tr>
<td>Surveys</td>
<td>Parents of students with disabilities</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Number sent</td>
<td>1,151</td>
</tr>
<tr>
<td></td>
<td>Number returned (%)</td>
<td>138(12%)</td>
</tr>
<tr>
<td></td>
<td>School facilitates parent involvement</td>
<td>39(28%)</td>
</tr>
</tbody>
</table>

**Reporting of Information**

Findings based on data generated through: record reviews; focus group interviews; individual interviews; case studies; classroom visits; parent surveys; and, the review of district forms are summarized in the reporting table that follows. This report provides conclusions with regard to the key data indicators and specifically addresses related areas that may contribute to or impact the indicators. In addition, information related to services for gifted students are reported.

To the extent possible, this report focuses on systemic issues rather than on isolated instances of noncompliance or need for improvement. In accordance with established Bureau monitoring procedures, a finding of a systemic violation will be made if evidence of such a violation is found in 25% or more of the pertinent data sources.

**Parent Surveys**

FDOE has elected to use the 25-item scale from the National Center for Special Education Accountability Monitoring (NCSEAM) survey that addresses family involvement. Each family selected to be included in the annual sample received a mailed survey printed on an optical scan form accompanied by a cover letter explaining the importance of the survey and guaranteeing the confidentiality of the parent’s responses. The packet also included a pre-addressed, postage-prepaid envelope for return of the survey. The survey was provided in three languages: English, Spanish, and Haitian-Creole.
Data from the surveys was scanned into an electronic database and sent to Dr. William Fisher, NCSEAM’s measurement consultant, who analyzed the data and produced reports at both the state and LEA levels.

The parent survey was sent to parents of 1,151 students (PK-12) with disabilities in Putnam County School District for whom complete addresses were provided by the district. A total of 138 parents, representing 12% of the sample, returned the survey. When applying the standard of measure indicating their perception of schools’ facilitation of parental involvement, 28% of parents of children ages 3-21 reported their perceived level of satisfaction at or above the standard.

**Student Record Reviews**

A total of 57 student records of students with disabilities and ten records of students identified as gifted were randomly selected from the population of ESE students and reviewed. The records were from eight schools in the district. Targeted or partial reviews of an additional 137 records were conducted on-site in conjunction with student case studies. Thirty-one of the records represented transition IEPs for students aged 14 or older. The collected information related to additional compliance areas designated by the Bureau. In addition to IEP reviews, the Bureau conducted reviews of six matrixes of services documents for students reported at the 254 or 255 funding level through the Florida Education Finance Program (FEFP). Any services claimed on the matrix must be documented on the IEP and must be in evidence in the classroom.

To be determined systemic in nature, an item must be found noncompliant in at least 25% of the records reviewed. For 8 IEPs more than 50% of the goals were not measurable, and IEP teams must be reconvened to address this finding. The district was notified of the specific students requiring reconvened IEP meetings in a letter dated March 14, 2007.

Systemic findings were made in the following areas:
- Lack of evidence of report of progress (49)
- Present levels of academic achievement and functional performance lack adequate information (37)
- Lack of adequate documentation of frequency of special education services/specially designed instruction; related services; supplementary aids and services; and accommodations and/or modifications (33)
- Lack of adequate short-term objectives or benchmarks (20)
- Lack of accurate identification of placement (20)

Individual or non systemic findings were noted in 16 additional areas.
- Lack of accurate explanation of the extent, if any, to which the student will not participate with nondisabled students in the general education class (13)
- Lack of measurable post-secondary goals (8)
- Lack of support for services on the IEP in the present level of academic and functional performance and annual goals and short-term objectives or benchmarks (7)
- Lack of social/emotional goal/service for EH/SED student (5)
• Lack of statement of why participation in a particular state or district-wide assessment is inappropriate and notification to the parent of the implications of nonparticipation (5)
• Lack of functional/daily living skills goal/service for EMH/THH student (5)
• Lack of informed change of FAPE (4)
• Lack of documentation of remediation needed to pass the FCAT(4)
• Lack of informed change of placement (3)
• Lack if evidence that students age 14 or older were invited to the IEP meeting (3)
• Lack of statement of how student who will not participate in state or district-wide assessment will be assessed and why the particular alternate assessment selected is appropriate (2)
• Lack of initiation/duration dates of special education services/specially designed instruction; related services; supplementary aids and services; and accommodations and/or modifications (2)
• Lack of evidence that parents were invited to the IEP meeting (2)
• Lack of counseling identified as a related service for SED student (1)
• Lack of statement of appropriate accommodations necessary to measure academic achievement and functional performance on state or district-wide assessments (1)
• Lack of evidence of consideration for the extended school year needs of the student (1)

Of the 10 EPs reviewed, systemic findings were made in the following areas:
• Lack of adequate annual goal (9)
• Lack of adequate PLEP (7)

Individual or non systemic findings were as follows:
• Lack of documentation how the student’s progress toward goal is measured and reported to parent (1)
• EP not in effect at time of review (1)

Matrix of Services:
• No findings of non-compliance

**On-Site Monitoring Activities**

During the course of conducting the focused monitoring activities, including daily debriefings with the monitoring team and district staff, it is often the case that suggestions and/or recommendations related to interventions or strategies are proposed, and promising practices are noted. Listings of these recommendations and promising practices, as well as DOE contacts available to provide technical assistance in the development and implementation of a system improvement plan, are included following the reporting table.

In response to specific student related findings listed in the letter to the superintendent, dated March 14, 2007, the district is required to correct the items as noted. This plan identifies the specific area(s) of a student’s IEP for which an IEP Team meeting must be held to correct the finding and/or specifies an action the district must perform to correct data.
In response to the findings included in the reporting table, the district was required to develop a system improvement plan. This plan was developed in consultation with the Bureau, and includes activities and strategies intended to address specific findings, as well as measurable evidence of change.
<table>
<thead>
<tr>
<th>Standard/Citation</th>
<th>Findings</th>
<th>Supporting Evidence</th>
<th>Concerns</th>
</tr>
</thead>
<tbody>
<tr>
<td>Indicator: Curriculum/Instruction (Standard Diploma)</td>
<td>No finding of noncompliance in this area.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Indicator: Performance on Statewide Assessment</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Related Factor: IEP Requirements/Implementation</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>§300.320(a)(6)(i)</td>
<td>Statement of special education and related services and supplementary aids and services to be provided to enable involvement and progress in the general education curriculum.</td>
<td>Records: 11 of 13 records reviewed of students who were on regular diploma have not passed the FCAT. 11 of 11 IEPs of students who have not passed the FCAT did not have any academic goals. 13 of 13 had similar time management goals identified; none receive services in organizational strategies. 13 of 13 IEPs of students on regular diploma who have not passed the FCAT were on consultation and received accommodations in the general education classroom only.</td>
<td></td>
</tr>
<tr>
<td>Related Factor: FCAT Waiver/Other Options</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>No findings of noncompliance in this area.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Standard/Citation</td>
<td>Findings</td>
<td>Supporting Evidence</td>
<td>Concerns</td>
</tr>
<tr>
<td>-------------------</td>
<td>---------------------------------------------------------------------------</td>
<td>--------------------------------------------------------------------------------------</td>
<td>----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td><strong>Indicator: Disproportionate Representation—EMH</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>No finding of noncompliance in this area.</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Indicator: LRE 6 – 21</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Related Factor: Removal Standard/Placement</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>6A-6.03411(3)(a)(2), F.S.</td>
<td>Removal from the General Education setting occurs only if the nature or severity of the disability is such that education in regular classes with supplementary aids and services cannot be achieved satisfactorily.</td>
<td>Records: In 4 of 10 records reviewed at Jenkins Middle School, students were placed in a more restrictive setting without informed notice of change of placement, or provision of additional support or supplemental services. Interviews: 3 of 4 administrative staff at Jenkins Middle School reported that late scheduling for incoming ESE 6 graders resulted in some of them having a change in placement.</td>
<td>In 9 of 11 records reviewed at James A. Long Elementary School, the district’s reported time with non-disabled peers was inaccurate. Of the 9 records that were reported inaccurately, 7 students spent more time with non-disabled peers. In 11 of 25 records reviewed at Palatka High School, the district’s reported time with non-disabled peers was inaccurate. In 4 of 8 case studies at Palatka High School, teachers reported that the student’s placement in their general education class was a result of the push for inclusion. In 4 of 4 records reviewed of students who are on Special Diploma Option 2, time with nondisabled peers and placement were incorrect.</td>
</tr>
<tr>
<td>§300.320(a)(5)</td>
<td>The IEP must include…An explanation of the extent, if any, to which the child will not participate with nondisabled children in the regular class…</td>
<td>Records: 17 of 34 records reviewed had similar items checked for justification for placement regardless of diploma type, exceptionality, or placement.</td>
<td></td>
</tr>
<tr>
<td>Standard/Citation</td>
<td>Findings</td>
<td>Supporting Evidence</td>
<td>Concerns</td>
</tr>
<tr>
<td>-------------------</td>
<td>----------</td>
<td>---------------------</td>
<td>----------</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Of 17 students in regular class placement, 14 denoted frustration, distractibility, and/or social-emotional withdrawal as their justification for placement.</td>
<td></td>
</tr>
</tbody>
</table>

**Indicator: Dropout**

No findings of noncompliance in this area.

In 7 of 14 case studies of high school age students, teachers reported students having adjustment and/or attendance problems with no reference to securing additional supports or referral to the child study teams.

**Indicator: Secondary Transition**

**Related Factor: IEP Contents**

§300.320(b) Beginning not later than the first IEP to be in effect when the child turns 16…., the IEP must include appropriate measurable postsecondary goals based upon age appropriate transition assessments related to training, education, employment, and where appropriate, independent living skills.

Records: 8 of 22 IEPs of students aged 16 or older did not have coordinated, measurable, annual goals and transition services that would reasonably enable the student to meet the post-secondary goals.

**Related Factor: Transfer of Rights**

No findings of noncompliance in this area.
<table>
<thead>
<tr>
<th>Standard/Citation</th>
<th>Findings</th>
<th>Supporting Evidence</th>
<th>Concerns</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Gifted</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Related Factor: EP Timelines</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>6A-6.030191(6)(a)</td>
<td>An EP must be in effect at the beginning of each school year.</td>
<td>Records: 1 of 10 EPs reviewed was not current at the time of the review.</td>
<td></td>
</tr>
<tr>
<td><strong>Related Factor: EP Requirements/Implementation</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Rule 6A-6.030191 (4)(b), FAC</td>
<td>EPs for student who are gifted must include a statement of goals, including benchmarks or short-term objectives.</td>
<td>Records: 9 of 10 EPs reviewed did not have annual goals and/or benchmarks or short-term objectives.</td>
<td></td>
</tr>
<tr>
<td><strong>Matrix of Services</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>S. 1011.62(1)(e), F.S.</td>
<td>No findings of noncompliance in this area.</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Student Record Reviews</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>§300.320-300.520 6A-6.03028</td>
<td>Zero findings of noncompliance resulted in funding adjustments. 27 TP/IEP teams must reconvene to address identified findings.</td>
<td>Records: 194 IEPs were reviewed, in whole or in part. 10 EPs were reviewed, in whole or in part.</td>
<td></td>
</tr>
<tr>
<td><strong>Forms Review</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>34 CFR §300.503 34 CFR §300.320 Rule 6A-6.03028, FAC</td>
<td>No forms require revisions to meet compliance.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
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 evidence of change. In developing the system improvement plan, every effort should be made to link the system improvement activities resulting from this focused monitoring report to the district’s targeted technical assistance needs identified through the State Performance Plan Indicator teams. The promising practices, recommendations, and technical assistance resources included below should be considered when developing strategies and/or interventions targeting the critical issues identified by the Bureau as most significantly in need of improvement.

Promising Practices, Recommendations and Technical Assistance

Promising Practices

During the visit, numerous promising practices were noted by district and school staff and by Bureau and peer monitors. Some of the reported promising practices were school specific, some were grade specific, and others were the results of district-wide initiatives. The district is encouraged to continue to promote an atmosphere where teachers and staff can share these practices. Some of the reported promising practices are listed below.

- Staff reported numerous programs for children at risk of dropping out and credit retrieval.
- Staff at River Breeze Elementary school report a close collaboration between ESE and general education teachers to ensure student success, school-level screenings at most schools identify potential students for gifted services and are designed to identify talented students as well.
- Staff reported that with the implementation of option two for students who are pursuing a special diploma, more students are remaining in school and some have returned to participate in the program.
- The district has implemented a requirement for two IQ measures. One measure must evaluate the student’s relative areas of strength before identification for EMH.
- The ESE department provides a wealth of staff development opportunities for ESE and general education teachers including: Inclusion 101, Differentiated Instruction, and Dealing with Differences.
- General education teachers reported that both ESE teachers and the ESE administration have been extremely supportive.

Recommendations

Recommendations have been proposed for the district to consider when developing the system improvement plan and determining strategies that are most likely to effect change. The list is not all-inclusive, and is intended only as a starting point for discussion among the parties responsible for the development of the system improvement plan (SIP).
Incorporate the use of effective instructional accommodations and supplemental aides and services, including information on the range of supports currently being used across the district, into existing staff development activities.

Provide training and/or technical assistance to IEP team participants regarding placement decisions for students with disabilities, with a focus on removing the student from the general education setting only when the team has identified student-specific behaviors or skill levels that cannot be supported in the general classroom.

Contact the Florida Inclusion Network (FIN) to provide training to all staff on additional strategies, supports and services that can be used in the general classroom to ensure student placement is in the least restrictive environment, and to assist general education teachers as schools are included in the inclusion initiative.

Conduct periodic self-assessments of ESE programs across schools to ensure that IEPs are being implemented and that all information (e.g., time with nondisabled) is reported accurately.

Target strategies for ensuring that all gifted students are provided with appropriate services based on their needs beyond the general curriculum.

Contact the Career Development and Transition (CDT) Project and the Transition to Independence Process (TIP) Project for assistance on how to development meaningful transition services for students with disabilities.

Technical Assistance

Bureau staff are available for assistance on a variety of topics. Staff may be contacted for assistance in the development and/or implementation of the system improvement plan. Following is a partial list of contacts:

**ESE Program Administration and Quality Assurance—Monitoring**
(850) 245-0476

Eileen L. Amy, Administrator
Eileen.Amy@fldoe.org

Kathy Dejoie, Program Director
Kathy.Dejoie@fldoe.org

Ginny Chance, Program Director
Ginny.Chance@fldoe.org

Angela Nathaniel, Program Specialist
Angela.Nathaniel@fldoe.org

**Clearinghouse Information Center**
(850) 245-0477

ciebicscs@FLDOE.org

**ESE Program Development and Services**
(850) 245-0478

Cathy Bishop, Administrator
Cathy.Bishop@fldoe.org

**Special Programs Information, Clearinghouse, and Evaluation**
(850) 245-0475

Karen Denbroeder, Administrator
Karen.Denbroeder@fldoe.org
The district is required to provide system improvement strategies to address identified findings of noncompliance, which may include an 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. In addition to findings of noncompliance, the report includes areas of concern that the district is encouraged to address, either through this system improvement plan or through other avenues. Resources, suggestions and/or recommended actions are provided following this plan format.

<table>
<thead>
<tr>
<th>Findings of Noncompliance</th>
<th>Improvement Strategies/Interventions</th>
<th>Outcome Measures and Timeline</th>
</tr>
</thead>
<tbody>
<tr>
<td>Indicator: Curriculum/Instruction (Standard Diploma)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>No findings of noncompliance in this area.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Indicator: Performance on Statewide Assessment</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Related Factor: IEP Requirement/Implementation</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
| Statement of special education and related services and supplementary aids and services to be provided to enable involvement and progress in the general education curriculum. | Training and/or technical assistance regarding appropriate special education services and supplemental aids and services will be incorporated into the general staff development activities for ESE staff. District and/or school staff will conduct periodic reviews of a sampling of IEPs (≥ 20 records) from each high school of grade 10 and higher students who are on standard diploma and have not passed the FCAT to evaluate:  
• extent to which the present level of educational performance addresses all the | District report of self-assessment reveals compliance with targeted elements for 100% of IEPs reviewed.  
September 2007  
March 2008 |
<table>
<thead>
<tr>
<th>Findings of Noncompliance</th>
<th>Improvement Strategies/Interventions</th>
<th>Outcome Measures and Timeline</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>needs related to the disability and academic problems related to their inability to pass the FCAT • correspondence among identified needs, goals and short-term objectives or benchmarks, and services provided.</td>
<td>District report of self-assessment reveals compliance with targeted elements for 100% of IEPs reviewed. September 2007 March 2008</td>
</tr>
</tbody>
</table>

**Related Factor: FCAT Waiver/Other Options**

No findings of noncompliance in this area.

**Indicator: Disproportionate Representation - EMH**

No findings of noncompliance in this area.

**Indicator: LRE 6 - 21**

**Related Factor: Removal Standard/Placement**

That removal from the general education environment occurs only when the nature or severity of the disability is such that education in regular classes with the use of supplementary aids and services cannot be achieved satisfactorily is not evident from students’ IEPs.

Training and/or technical assistance regarding requirements for placement decisions will be incorporated into the general staff development activities for ESE staff.

District and/or school staff will conduct periodic reviews of a sampling of IEPs (≥ 20 records) of students who are removed from the general education setting for part of the day to evaluate:

• sufficiency of explanations justifying removal
• extent to which the present level of educational performance addresses all the needs related to the disability
• correspondence among identified needs, goals and short-term objectives or benchmarks, and services provided.
### Findings of Noncompliance

Areas of concern are noted in the body of the report.

### Improvement Strategies/Interventions

Continue to provide the following training opportunities (including resources and on-going support) to school administrators and teachers through the Florida Inclusion Network (FIN), Florida Diagnostic and Learning Resources Systems (FDLRS) and district staff:
- Differentiated Instruction
- Cooperative Learning
- Accommodations and Modifications
- Improving Access to the General Education Curriculum
- Universal Designs of Learning
- Classroom Management Training
- Collaborative Planning and Teaching

Continue to disseminate information on responsible inclusive practices through:

Establish a comprehensive multi-agency periodic listing of available district-wide trainings easily accessed from the district website.

*The district is encouraged to include strategies to address concerns noted in the body of this report.*

### Outcome Measures and Timeline

District report of self-assessment will reveal:
- the number of educators participating in training on the implementation of effective inclusive practices and instructional accommodations
- participant satisfaction as a result of training.
- dissemination information (number receiving information, copies of information and dates of dissemination).

Results to be reported semi-annually:
- September 2007
- March 2008

### Indicator: Dropout

No findings of noncompliance in this area.

Areas of concern are noted in the body of the report.

*The district is encouraged to include strategies to address concerns noted in the body of this report.*
<table>
<thead>
<tr>
<th>Findings of Noncompliance</th>
<th>Improvement Strategies/Interventions</th>
<th>Outcome Measures and Timeline</th>
</tr>
</thead>
<tbody>
<tr>
<td>Indicator: Secondary Transition</td>
<td>Related Factor: IEP Contents</td>
<td></td>
</tr>
<tr>
<td>IEP includes coordinated, measurable, annual goals and transition services that will reasonably enable the student to meet the post-secondary goal(s).</td>
<td>The IEP teams for the 8 identified students will reconvene to address identified noncompliance. Receive technical assistance on appropriate use of the Transition Checklist. Receive technical assistance from the Career Development and Transition (CDT) Project and the Transition to Independence Process (TIP) Project on the development of meaningful transition services for students with disabilities. Training regarding how to write measurable goals will be incorporated into the general staff development activities for ESE and general education staff. Using the Transition Checklist Protocol provided by the Bureau district and/or school staff will conduct quarterly self-assessments of a random sampling of 10 records per high school of students 16 and older to ensure that all transition requirements are addressed. Following an analysis of the record review results, district staff will determine if targeted compliance was met or if additional training is required.</td>
<td>Documentation of the reconvened IEPs with 100% compliance of targeted elements will be submitted to the Bureau by June 30, 2007.</td>
</tr>
</tbody>
</table>

| Related Factor: Transfer of Rights | | District report of self-assessment reveals compliance with all targeted elements for 100% of IEPs reviewed. September 2007 March 2008 |
|-------------------------------------|-----------------------------|
| No findings of noncompliance in this area. | | |
### Findings of Noncompliance

<table>
<thead>
<tr>
<th>Related Factor: EP Timelines</th>
<th>Improvement Strategies/Interventions</th>
<th>Outcome Measures and Timeline</th>
</tr>
</thead>
<tbody>
<tr>
<td>An EP must be in effect at the beginning of each school year.</td>
<td>The EP team for the identified student will reconvene to assess need for special instructional program.</td>
<td>Documentation of the reconvened EP with 100% compliance of targeted elements will be submitted to the Bureau by June 30, 2007.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Related Factor: EP Requirements/Implementation</th>
<th>Improvement Strategies/Interventions</th>
<th>Outcome Measures and Timeline</th>
</tr>
</thead>
<tbody>
<tr>
<td>EPs for student who are gifted must include a statement of goals, including benchmarks or short-term objectives.</td>
<td>Revise the EP form to include annual goals and/benchmarks or short-term objectives.</td>
<td>Provide documentation of the submitted changes to the Bureau. October 2007</td>
</tr>
</tbody>
</table>

### Matrix of Services

No findings of noncompliance in this area.

### Student Record Reviews

Systemic findings of noncompliance on IEPs were related to:
- Lack of evidence of report of progress
- Present levels of academic achievement and functional performance lack adequate information
- Lack of adequate documentation of frequency of special education services/specially designed instruction; related services; supplementary aids and services; and accommodations and/or modifications

The IEP teams for the identified students will reconvene to address identified findings. The identified noncompliant elements will be targeted in the district’s IEP training. Pre-and post- training surveys will be conducted to determine perceived effectiveness of the training. Using protocols developed by the Bureau, school and/or district staff will conduct semi-annual compliance reviews of a random sample of 10 IEPs developed by staff who participated in the training session.

Documentation must be submitted and accepted by the Bureau by June 30, 2007 District report of self-assessment reveals compliance with targeted elements for 100% of IEPs reviewed.

September 2007 March 2008
<table>
<thead>
<tr>
<th>Findings of Noncompliance</th>
<th>Improvement Strategies/Interventions</th>
<th>Outcome Measures and Timeline</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Lack of adequate short-term objectives or benchmarks</td>
<td></td>
<td></td>
</tr>
<tr>
<td>• Lack of accurate identification of placement</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Individual or non-systemic findings of noncompliance were noted on 16 additional IEP components.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>For 8 IEPs more than 50% of the annual goals were not measurable.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>There were 2 systemic findings of noncompliance for EPs:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>• Lack of adequate annual goal</td>
<td></td>
<td></td>
</tr>
<tr>
<td>• Lack of adequate PLEP</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Individual or non-systemic findings of noncompliance were noted on 2 additional EP components.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Forms Review**

No forms require revisions to meet compliance.
Appendix A:

ESE Monitoring Team Members
Department of Education Staff

Bambi J. Lockman, Chief, Bureau of Exceptional Education and Student Services
Eileen L. Amy, Administrator, ESE Program Administration and Quality Assurance
Ginny Chance, Program Director, ESE Program Administration and Quality Assurance

ESE Monitoring Team Members

Angela Nathaniel, Program Specialist, Team Leader
Ginny Chance, Program Director
Marilyn Hibbard, Program Specialist
Barbara McAnelly, Program Specialist

Peer Reviewers and Contracted Staff

Jim Fowler, Broward County Schools
Pam Harshbarger, Pinellas County School District
Cathy Hedbawny, Jackson County School District
Kimberly Keene, Jackson County School District
Brenda Lambert, Hamilton County School District
Nancy Nielsen, Suwannee County School District
Ramona Patrick, Taylor County School District
Janell Warfel, Hamilton County School District
Chrystal Woodall, Union County School District