

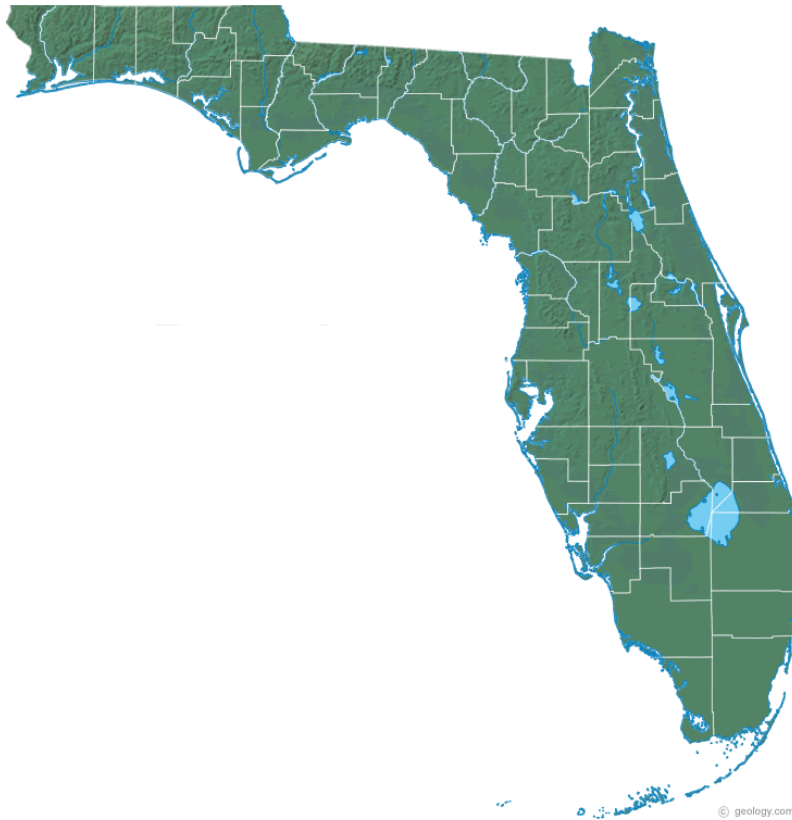
REVISED

Alachua County Public Schools

Final Report: On-Site Monitoring

Exceptional Student Education Programs

September 30 - October 2, 2008



Bureau of Exceptional Education and Student Services
Florida Department of Education

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 that 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:

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January 22, 2009

Dr. W. Daniel Boyd, Jr., Superintendent
Alachua County School District
620 East University Avenue
Gainesville, Florida 32601- 5498

Dear Superintendent Boyd:

We are pleased to provide you with the *revised* Final Report of On-Site Monitoring of Exceptional Student Education Programs in Alachua County (revisions in bold italics on page five of the report). This report was developed by integrating multiple sources of information from our visit on September 30 – October 2, 2008, including: student record reviews, interviews with school and district staff; information from focus groups; and classroom observations; as well as other general supervision activities conducted by the Bureau (e.g., state complaint investigations, ESE compliance self-assessment, due process hearings). The final report will be placed on the Bureau of Exceptional Education and Student Services' website and may be viewed at <http://www.fldoe.org/ese/mon-home.asp>.

The report includes the findings of the monitoring team. Bureau staff worked with Kathy Black, ESE Director, and her staff 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.

Within the report, we have included required corrective actions, recommendations and resources. The first scheduled corrective action is due within 60 days of receipt of this report. The Department of Education must ensure correction of noncompliance within one year of reporting to the district. The successful completion of the required corrective actions and the submission of a final status report no later than December 22, 2009, 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 complete the corrective actions, please contact Kim Komisar, Ph.D., ESE Program Administration and Quality Assurance Administrator. Dr. Komisar may be reached at 850.245.0476, or via electronic mail at Kim.Komisar@fldoe.org.

BAMBI J. LOCKMAN

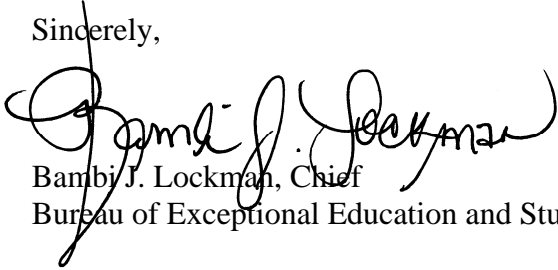
Chief

Bureau of Exceptional Education and Student Services

Superintendent Boyd
January 22, 2009
Page 2

Thank you for your continuing commitment to improve services for exceptional education for student in Alachua County.

Sincerely,

A handwritten signature in black ink, appearing to read "Bambi J. Lockman". The signature is fluid and cursive, with a large initial "B" and "L".

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

Enclosure

cc: Tina Pinkoson, School Board Chairman
Members of the School Board
James F. Lang, School Board Attorney
School Principals
Kathy Black, ESE Director
Kim Komisar
Patricia Howell

**Alachua County Public Schools
Final Report: On-Site Focused Monitoring**

September 30 - October 2, 2008

**Bureau of Exceptional Education and Student Services
Department of Education**

Alachua County Public Schools

Final Report: On-Site Monitoring September 30 - October 2, 2008

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**Alachua County On-Site Focused Monitoring
September 30 - October 2, 2008
Final Report**

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) 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. In accordance with the IDEA the Department is responsible for ensuring that its requirements 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 §§300.120, 300.149, and 300.600).

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.

Monitoring Process

District Selection

On August 12, 2008, the Bureau notified Alachua County Public Schools (ACPS) of the plan to conduct on-site monitoring of the district's exceptional student education program, specifically secondary transition services for students with cognitive impairments. This additional action was determined by the Bureau to be necessary following the review of documentation provided by the district in response to a state complaint investigation involving the district's provision of secondary transition services to students with cognitive impairments (Bureau Resolution

Determination BEESS-2008-003-RES). Kathleen Black, ESE Director, served as the coordinator and point of contact for the district during this monitoring process.

On-Site Activities

Monitoring Team

During the week of September 29, 2008, Bureau staff conducted an onsite review of secondary transition services for students with disabilities enrolled in ACPS. The following staff members conducted the onsite visit:

- Demetria Harvell, Program Director, Dispute Resolution (Team Leader)
- Patricia Howell, Program Director, Monitoring and Compliance
- Annette Oliver, Program Specialist
- Laura Harrison, Program Specialist
- Sheila Gritz, Program Specialist for Secondary Transition

Schools

The following schools were selected for onsite visits based on the number of students with cognitive impairments enrolled, given that this was the target student population included in the complaint investigation and corrective action for Bureau Resolution Determination BEESS-2008-003-RES:

- F. W. Buchholz High School
- Eastside High School
- Gainesville High School
- Sidney Lanier Center School

Community-Based Vocational Education (CBVE) Sites

As with school selection (above), the following CBVE sites were selected for onsite visits based on the specific students included in the state complaint investigation and corrective action for Bureau Resolution Determination BEESS-2008-003-RES:

- Alachua General / Shands Hospital
- Alachua County Public Library
- Big Lots, Inc.
- March of Dimes
- Wal-Mart

Data Collection

The monitoring activities and interview protocols implemented during the onsite monitoring visit to ACPS focused on procedural requirements related to secondary transition, specifically as they are implemented for students with cognitive impairments. Monitoring activities conducted in ACPS included the following:

- District-level interviews – 3
- School-level interviews – 18
- Classroom observations – 7
- CBVE site observations – 5
- Case studies – 6
- Focus group for parents and students – 7 participants (5 parents and 2 students)

Results

The information reported here includes data collected through onsite monitoring as well as other general supervision activities conducted by the Bureau (e.g., state complaint investigation, ESE compliance self-assessment, due process hearing). Following a review of individual educational plans (IEPs) revised in response to the required corrective action for BEESS-2008-003-RES and the completion of on-site monitoring activities, the Bureau noted the following:

1. Documentation provided by the district on May 23, 2008, verified the completion of the required corrective actions specific to the individual student named in the state complaint up to that date as follows:
 - Team members discussed daily living skills, transition assessments and supported employment
 - Compensatory services for occupational therapy (OT) were discussed and offered; parents preferred to wait to finalize the plan
 - Progress reports for the 2006-07 and 2007-08 school years were provided
 - Written notice of refusal provided for specific daily living skills instruction requested in August and September 2006
 - Functional vocational evaluation was completed
2. As part of the systemic corrective action for the state complaint, ACPS was required to reconvene individual IEP team meetings for all the students ages 16 and older with cognitive impairments to ensure that an opportunity was provided to address each student's individual needs related to daily living skills and appropriate measurable postsecondary goals based upon age appropriate transition assessments related to training, education, employment, and, where appropriate, independent living skills. Documentation provided by the district verified that the IEP teams for 100 students were reconvened.
3. In accordance with corrective action required by the state complaint, for those students whose previous transition assessments were determined to be insufficient, transition assessments were conducted and the IEP teams addressed the possible need for compensatory services.
 - The IEP teams considered the results of the transition assessments and revised the IEPs to provide appropriate transition services. However, the majority of IEPs did not clearly reference the IEP team's consideration of compensatory services
 - During the onsite visit, school and district staff confirmed that the possible need for compensatory services remains open for the designated students who had previous insufficient transition assessments, and that IEP teams will be better able to determine the need and resulting plans and timelines for the provision of compensatory services at future IEP team meetings, based on the students' progress under the revised IEPs.
 - The faculty and staff directly involved in transition planning for students with cognitive impairments and in providing instruction to this student population had received training regarding transition assessments as required.
 - Based on interviews conducted onsite, some staff members charged with assisting in the transition planning process may not have a clear understanding of the intent of the requirement to conduct age-appropriate transition assessments. These assessments must be sufficiently substantive to provide meaningful information for the transition planning process.

4. The completion of transition assessment or vocational evaluation was not documented on eight of the IEPs reviewed.
5. Four of the students' IEPs lacked coordinated annual IEP goals and transition services that would reasonable enable the students to meet the postsecondary goals.
6. In accordance with corrective action required by BEESS-2008-003-RES, for the IEP team meetings required for item #2 above, the district identified the agencies that were likely to be responsible for providing or paying for transition services and, with the consent of the parents or the students who had reached the age of majority, representatives of appropriate agencies were invited to the IEP team meetings.
 - The faculty and staff directly involved in transition planning aspects for students with cognitive impairments and providing instruction to this student population received training regarding determining the appropriateness of inviting other agencies to transition IEP team meeting and which agencies might be appropriate to invite to the meetings.
 - Based on interviews conducted onsite, there is some confusion regarding the requirement to obtain parent consent prior to inviting agencies to an IEP team meeting.
7. The final report for ACPS's 2007-08 ESE compliance self-assessment, issued June 20, 2008, included a corrective action plan (CAP) for systemic findings of noncompliance regarding the following secondary transition requirements:
 - Measurable postsecondary goals based on age-appropriate transition assessments
 - Annual goal(s) or short-term objectives or benchmarks that reasonably enable the student to meet the postsecondary goals
 - Transition services on the IEP that focus on improving the academic and functional achievement of the student to facilitate the student's articulation from school to post-school living.

All individual incidents of noncompliance were timely corrected, with verifying documentation provided to the Bureau on June 9, 2008. The final status report for the district's 2007-08 CAP will include the results of the correction of systemic findings of noncompliance and is due to be submitted to the Bureau by December 22, 2008.

8. On September 5, 2008, the Advocacy Center for Persons with Disabilities, Inc., filed a request for a due process hearing on behalf of the specific student named in the state complaint, referencing the student's transition services, assistive technology services, and OT services. On November 18, 2008, the case was placed in abeyance pending the receipt of evaluations.
9. Other concerns included the following:
 - Lack of evidence that supported employment was offered or available
 - For many of the students in the age range of 20-22 years old working toward a special diploma, community-based instruction (CBI) was provided only on a weekly basis
 - For some students 20 years old, no employment services were indicated on the IEP
 - For some students, the IEPs indicated the need for a job coach, but no job coach was provided and there was a statement by the IEP team that no additional services or assessments were needed
10. Based on observations and interviews conducted at job sites, it is evident that the district has increased its focus on providing appropriate transition services in the community for this student population.
 - Students were actively engaged in work assignments

- Job coaches were readily available to provide assistance
 - Employers at all of the job sites were complimentary of the students' performance
11. During the parent-student focus group held on October 2, 2008, one of the families reported that during that week they had been given a transfer of rights document for their student who was already 19 years old. This student's IEP dated August 22, 2007, indicated that the student had been informed of transfer of rights at least one year prior to reaching age of majority; however, the specific date of notification had been entered as August 17, 2005, then crossed out and initialed. This student was several months past the age of majority at the time of the August 22, 2007, IEP team meeting.
 12. The following concerns were stated by parent and student participants in the focus group:
 - Teachers and paraprofessionals in some cases are inadequately trained to provide transition services
 - There are a limited number of paying jobs available for students with disabilities
 - There is a need for a liaison to assist parents and school staff when working with agencies (service providers) in the community
 - Students are not always appropriately supervised by job coaches while on community job sites
 - The continuum of available transition services for students with cognitive impairments is limited
 - There is a need for more support to assist students to prepare for postsecondary independent living
 - Some IEPs may not be fully implemented; there is a need for district or school oversight to ensure that this occurs
 13. Most of the students with cognitive impairments who are working in the community are participating in non-paid CBVT. Interview respondents expressed optimism about the likelihood that students will "shine" in non-paid work experiences and subsequently gain paid employment within those work sites. However, there is little evidence that this model is culminating in paid employment for the students.
 14. Based on interviews with district and school staff, employment expectations for this group of students are limited, and there is a perception that there is a lack of support or acceptance for hiring individuals with disabilities within the greater community.
 15. For this group of students, the continuum of transition services designed to culminate in paid employment is limited.

Corrective Actions, Recommendations, and Resources

Corrective Actions

The following are required corrective actions:

1. The individual student level findings reported in items **4** and **5** in the **Results** section of this document (above) must be corrected within 60 days of receipt of this report. Identifying information regarding the students in question has been provided to the district under separate cover.
2. For the systemic corrective action that has not been completed from BEESS-2008-003-RES, the district shall provide quarterly reports (January 30, 2009; April 15, 2009; June 16, 2009;

and October 30, 2009) regarding each student in the complaint group and the IEP team's determination whether compensatory services are needed. Any needed compensatory services must be provided to these students no later than August 29, 2009. Verification of the provision of compensatory services shall be provided to the Bureau with the quarterly reports, as applicable.

Recommendations

The following are recommendations for the district to consider in its ongoing development and implementation of secondary transition programs for students with disabilities, in particular students with cognitive impairments:

1. Provide additional staff training in the following areas:
 - Increasing expectations for students with cognitive impairments
 - Supported employment
 - Transfer of rights at age of majority
 - Social Security Administration benefits and the impact of employment
 - Work tax credit for employers
 - Development and application of age appropriate transition assessments
 - Development of postsecondary measurable goals
 - Job carving techniques (i.e., analyzing work duties performed in a given job and identifying specific tasks that might be assigned to an employee with disabilities)
 - Responsibilities of the district and the student for the student's employment via Special Diploma Option 2
2. Readdress the structure of career development for all youth in the ACPS.
 - Provide training on how to obtain and maintain competitive employment before exiting high school, with the expectation that it culminate in paid employment.
 - Decrease the number of paraprofessionals who are assigned to work in career preparation classes (e.g., labs), and retrain selected staff as job coaches.
 - Offer career preparation for students who are 14-15 years old, career experiences for students who are 16-18 years old, and paid employment via career placement or supported employment for students who are 19-21 years old, with flexibility regarding the age groups so that the decision to move into paid employment is driven by the student's needs rather than age.
 - Decrease the number of non-paid training sites to open the door to more potential paid employment opportunities. It is also important to ensure that there is diversity in the types of work experiences available to students.
3. Visit a district with quality practices and/or inviting such a district to visit the ACPS. Recommended districts based on size and practices would be Lee County, Pinellas County, and Volusia County. All have exhibited promising practices in career development, which culminate in paid employment, including supported employment.
4. Coordinate and/or assist in the provision of awareness activities in the community. With many potential employment opportunities (e.g., multiple hospitals, parks, museums, the University of Florida, and Santa Fe Community College), there could be considerable progress in the employment of young adults with disabilities.
5. Develop more partnerships in the community as an effort to increase opportunities for paid employment for students served in ESE.

Resources

The following resources are designed to provide technical assistance, support, and guidance to school districts, teachers, and families as they plan for and implement secondary transition services for students with disabilities:

Publications

The following documents are available electronically:

- *Taxonomy for Transition Programming* by Paula D. Kohler, Ph.D. (Western Michigan University and Transition Research Institute, University of Illinois at Urbana-Champaign) - a tool for assessing broad strengths and weaknesses in the five areas of secondary transition programming
- *Technical Assistance Paper: Non-Paid Community-Based Vocational Education (CBVE) Programs* (Florida Department of Education, Bureau of Exceptional Education and Student Services) – a tool for verifying that the ACPS non-paid vocational training programs are operating within the required parameters
- *Technical Assistance Paper: Serving Students with Disabilities Ages 18-21* (Florida Department of Education, Bureau of Exceptional Education and Student Services) – program options
- *Secondary Transition and Compliance 2008* (Bureau of Exceptional Education and Student Services) – the basics of the Transition IEP aligned with ESE compliance self-assessment for Indicator 13 of the State Performance Plan (SPP)
- *Transition Assessment: An Ongoing Process 2008* (Bureau of Exceptional Education and Student Services) – IDEA requirements for transition assessment, formal and informal transition assessment tools, resources specifically used for transition assessment through hands-on application activities, how and where transition assessment fits within the Transition IEP process
- List of Selected Transition Assessments (Bureau of Exceptional Education and Student Services)
- *National Secondary Transition Technical Assistance Center (NSTTAC) Age Appropriate Transition Assessment Guide*
- *OSEP IDEAs that Work: Age Appropriate Transition Assessment Fact Sheet* (Division on Career Development and Transition, Council for Exceptional Children, NSTTAC)
- *Career Development and Assessment: Websites and Free Resources* (Developed by Sheila D. Gritz, with components adapted from *SIMPLY Careers!* Florida Department of Education, 2003)
- List of Additional Resources (Bureau of Exceptional Education and Student Services)
- *Kevin: Case Study* (adapted from the NSTTAC I-13 Training Materials retrieved from <http://www.nsttac.org/> and a PowerPoint presentation developed for the National Council for Exception Children titled “Transition Policy and the Public Agenda: Today, Tomorrow, and for the Future,” developed by Ed O’Leary, Ph.D. for the Colorado Transition Summer Institute, June 20, 2007)

Web Sites

- NSTTAC Web site: <http://www.nsttac.org>

- Transition Coalition Web site: <http://transitioncoalition.org/transition/18-21/index.php> - a searchable database as well as several products that may be downloaded
- The National Center for Secondary Education and Training (NCSET) Web Site: <http://www.ncset.org>
- Professional Development Alternatives for Exceptional Student Educators (PDA-ESE) Web site: <http://www.pda-ese.org> - Transition Module

Technical Assistance

The following is a partial list of Bureau staff available for assistance in the development and/or implementation of improvement planning activities:

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Appendix:

Glossary of Acronyms

**Florida Department of Education
Bureau of Exceptional Education and Student Services**

Glossary of Acronyms

ACPS	Alachua County Public Schools
Bureau	Bureau of Exceptional Education and Student Services
CAP	Corrective Action Plan
CBI	Community Based Instruction
CBVE	Community Based Vocational Education
CBVT	Community Based Vocational Training
CFR	Code of Federal Regulations
ESE	Exceptional Student Education
F.S.	Florida Statutes
IDEA	Individuals with Disabilities Education Act of 2004
IEP	Individual Educational Plan
NCSET	National Center for Secondary Education and Training
NSTTAC	National Secondary Transition Technical Assistance Center
OCR	Office for Civil Rights
OSEP	Office of Special Education Programs
PDA-ESE	Professional Development Alternatives for Exceptional Student Educators
USDOE	United States Department of Education



**Florida Department of Education
Dr. Eric J. Smith, Commissioner**

ESE 312968A