

FINAL REPORT OF VERIFICATION MONITORING OF  
EXCEPTIONAL STUDENT EDUCATION PROGRAMS IN

# **BRADFORD COUNTY**

FEBRUARY 16-17, 2004



FLORIDA DEPARTMENT OF EDUCATION  
BUREAU OF INSTRUCTIONAL SUPPORT AND COMMUNITY SERVICES  
ESE PROGRAM ADMINISTRATION AND QUALITY ASSURANCE

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April 27, 2004

Mr. Ulysses Woods, Director  
Exceptional Student Education  
Bradford County School District  
501 W. Washington Street  
Starke, FL 32091-2610

Dear Mr. Woods:

Thank you for your hospitality during our recent verification monitoring visit, February 16-17, 2004. During the visit, the district provided a comprehensive and well-prepared status report in response to the final monitoring report from the May 2002 random monitoring visit. Visits to selected sites were conducted to verify information presented by the district. Bureau staff has reviewed the additional information collected during the visit and a report of this visit is attached.

While the district has completed the strategies of the system improvement plan resulting from the 2002 monitoring visit, the district must submit a final status report in June 2004 related to this plan. In addition, the district will be required to revise its continuous improvement monitoring plan in its June 2004 report to incorporate the following findings from this visit:

- behavior/discipline
- student records
- district forms

We appreciate your ongoing efforts on behalf of exceptional students. Please contact Kim Komisar, Program Director, at (850) 245-0476 or via electronic mail at [Kim.Komisar@fldoe.org](mailto:Kim.Komisar@fldoe.org) if we can be of any further assistance to your district.

Sincerely,

*Michele Polland*

Michele Polland, Acting Chief  
Bureau of Instructional Support and Community Services

cc: Harry Hatcher  
Eileen Amy  
Kim Komisar

**MICHELE POLLAND**  
*Acting Chief*  
*Bureau of Instructional Support and Community Services*



**Bradford County Final Monitoring Report  
Verification Monitoring Visit  
February 16-17, 2004**

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## **Bradford County School District Verification Monitoring Visit February 16-17, 2004**

On February 16-17, 2004, the Florida Department of Education, Bureau of Instructional Support and Community Services, conducted an on-site verification review of the exceptional student education (ESE) programs in Bradford County Public Schools. The primary purpose for conducting verification visits to districts previously monitored is to afford school districts an opportunity to offer validation of the activities they have undertaken through their system improvement plans. These visits provide an assurance to the Bureau that the strategies agreed to in the improvement plans are being implemented. They also give districts an opportunity to demonstrate progress, as well as for districts to request additional technical assistance regarding the implementation of their system improvement plans.

Bradford County was selected for random monitoring in 2002. The results of the verification visit are reported under the following categories or related areas that were included in the final monitoring report of the random monitoring visit conducted May 20-23, 2002:

- general supervision
- assessment
- behavior/discipline
- curriculum and instruction
- least restrictive environment
- post-school transition
- pre-K/transition from Part C to Part B
- parent involvement
- gifted
- student records review
- special category records review
- district forms review

### **Site Visit**

The primary on-site activity conducted as part of the verification monitoring visit was a demonstration by the district of the strategies implemented thus far through the system improvement plan developed as a result of the 2002 random monitoring process. The components of the demonstration were determined by the district based on the areas targeted for improvement, and the types of activities conducted by the district.

The demonstration by Bradford County included a presentation related to the implementation of strategies identified in the system improvement plan based on findings of noncompliance from the final monitoring report. A manual, outlining all district activities related to the system improvement plan, was prepared and presented to Bureau staff. Ulysses Woods, Director, Exceptional Student Education, served as the coordinator and point of contact for the district during the monitoring visit. In addition, Vicki Powell, Harvey Lofton, Deena Barnett, Cindy DeValerio, Carol Starr, and Michele Verunac participated in the presentation. These participants

should be commended for a presentation that was thorough, well prepared, and well executed; the written documentation verified the information presented orally.

In addition to the district presentation, the verification visit included visits to Bradford High School, Bradford Middle School, Lawtey Community School, and Southside Elementary School for the purpose of validating information provided during the district presentation. The visit also included compliance monitoring in the areas of individual educational plans (IEPs) for students with disabilities, special category records, and the provision of counseling as a related service and speech and language services. School site visits included the following:

- 20 interviews with selected school and district staff
- two classroom visits
- reviews of 16 IEPs for students with disabilities, including matrix reviews for three of these students

## **Results**

### **General Supervision**

Findings from the 2002 monitoring report in the area of general supervision were related to the continued need for training for teachers to provide instruction and accommodations effectively, lack of academic and behavioral tracking of students with disabilities, and lack of a clear designation at the district level regarding roles and responsibilities for special program areas.

Strategies implemented to address the area of general supervision included the following:

- numerous staff development activities related to accommodations, modifications, and consultation techniques
- district review of student records and classroom visits to ensure compliance with the provision of accommodations based on students' IEPs
- development and implementation of the use of monthly consultation logs
- development and implementation of academic and behavioral performance logs
- development and dissemination of written criteria for roles and responsibilities for ESE teachers

Interviews with school-level staff and reviews of student records at the visited schools verified the data presented by the district. Interviewees indicated that training has been provided to teachers and that accommodations are being provided to students in general education classes based on decisions made at the IEP meetings. General education teachers revealed that they have input into accommodations decisions made at IEP meetings. Teachers are provided with an accommodations page listing individual students and the appropriate accommodations for each.

Reviews of consultation logs at the district office revealed the use of teacher-to-teacher consultation on a regular basis. Interviews with school staff confirmed the use of consultation as a support for students with disabilities.

The district has fulfilled all requirements of this category and is encouraged to continue its efforts to improve general supervision.



## **Assessment**

Findings from the 2002 final monitoring report in the area of assessment were related to the lack of individualized accommodations and the lack of provision of accommodations at the high school level. The district implemented the following strategies to address the area of assessment:

- numerous staff development activities related to accommodations and modifications
- provision of accommodations page to teachers
- consultation between district ESE director and school principals regarding the implementation of accommodations

Interviews with school staff and IEP reviews revealed the use of individualized accommodations for students with disabilities. Teachers are provided with an accommodations page listing individual students and the appropriate accommodations for each. Principals confirmed the use of the accommodations page. The district has completed all strategies indicated in the system improvement plan related to assessment and will need to provide a final status report based on self-assessment in June 2004.

## **Behavior/Discipline**

Findings from the 2002 monitoring report in the area of behavior management and discipline were related to the lack of consistent use of school-wide discipline plans with a structured array of in-school interventions that employ positive behavioral supports, and the lack of functional behavioral assessments (FBAs) and behavior intervention plans (BIPs). The district has implemented the following strategies to address behavior/discipline:

- development of school-wide discipline plans
- development of district-wide discipline plan for students with disabilities (to be presented to board for approval in July 2004)
- training related to FBAs and BIPs
- development of procedures to ensure that all appropriate persons have copies of BIPs for implementation

Interviews with school-level staff confirmed that training on the development and implementation of FBAs and BIPs has been provided. Interviewees indicated that they are provided with or have access to BIPs when responsible for implementation of the plans. The review of student records confirmed the use of BIPs for students who demonstrate a need.

One of the district's measures of evidence of change in the area of behavior management and discipline was to reduce the percent of students who are placed in in-school (ISS) and out-of-school (OSS) suspension. According to the Florida School Indicators Report, elementary level ISS rates have decreased from 6.8% to 5.2%; middle school ISS rates have increased from 29.8% to 32.5%; and high school ISS rates have decreased from 32.1% to 27.5%. OSS rates have increased from 3.5% to 3.8% at the elementary level, increased from 11.9% to 14.4% at the middle school level, and decreased from 12.1% to 11.6% at the high school level.

Interviews with school level personnel indicate that many referrals to ISS result from students being tardy for class. There is a lack of an array of in-school interventions that employ positive behavioral supports to address nonviolent discipline problems. There has been an increase in the percent of students at the middle school level who have been disciplined using ISS and OSS and

an increase in OSS at the elementary level. The district will be required to address these findings related to discipline in its continuous improvement plan.

The district has completed all strategies required in the system improvement plan and will be required to submit a final status report in this area in its 2004 mid-year report. The district will also be required to add a measurable goal and benchmarks and develop strategies to address the area of behavior management and discipline in its continuous improvement monitoring plan. This goal with appropriate strategies must be added to the continuous plan status report in June 2004.

### **Curriculum and Instruction**

Findings from the 2002 monitoring report in the area of curriculum were related to a lack of curricular scope and sequence at the high school level. The district has implemented the following strategies to address the area of curriculum:

- selection of curriculum committee to develop a comprehensive scope and sequence
- development of scope and sequence
- inclusion of scope and sequence in pupil progression plan
- provision of graduation requirements to parents and students at the time of diploma option decision

The district has completed all strategies required in the system improvement plan and will be required to submit a final status report in this area in its 2004 mid-year report.

### **Least Restrictive Environment**

The only finding from the 2002 monitoring report in the area of least restrictive environment (LRE) was that adaptive physical education (PE) was not available to students who required this service. Strategies implemented by the district to address this area included:

- investigated requirements and guidelines for “specially designed physical education”
- contracted services from an adaptive PE consultant
- provided training to PE teachers and ESE teachers of self-contained units

It was reported that all students who require adaptive PE are receiving the service.

Although there were no additional findings related to LRE in the 2002 report, it should be noted that according to the 2003 LEA profile, 52% of students with disabilities in the district are served in the regular class placement (80% or more of the day with nondisabled peers). This is higher than the state average of 48%. In addition, only 28% of the students identified as educable mentally handicapped (EMH) are served in separate class placement (less than 40% of the day with nondisabled peers). This is well below the state average of 61%. Bureau staff asked district and school level personnel to share insights into the successful LRE practices in the district. The responses included the following:

- no center school
- some schools have implemented inclusion, with supplementary aids and supports in the regular classrooms
- good teachers willing to do what is necessary for students to be successful in the regular classroom
- strong advocacy for ESE students by the ESE teachers

- everyone willing to work together for student success

The district has completed all requirements in this area of the system improvement plan and should be commended for its efforts in providing for the education of students with disabilities in the least restrictive environment.

### **Post-School Transition**

The finding from the 2002 final monitoring report in the area of post-school transition was a need for effective transition services for students with disabilities, including agency agreements. Strategies implemented by the district to address the area of post-school transition include the following:

- development of interagency agreements with Bradford Association for Retarded Citizens (ARC)
- development of interagency agreement with Naval Air Depot in Jacksonville for student career experience program

The district presented products made by students who are participating in the Bradford ARC program at Sunshine Industries. Eleven students qualified and have been placed this year with ARC. One student has moved back to the high school, two have moved on to jobs within the community and eight continue to work at Sunshine Industries. The students are paid based on production and a pay scale developed by the Department of Labor. The district has provided a transition specialist who works directly with the students and ARC. It was also reported that the transition specialist has strong support from private businesses within the community to assist in placing students in jobs within the community. The district has completed all strategies in the area of post-school transition required in the system improvement plan.

### **Pre-K Transition from Part C to Part B**

Although there were no findings from the 2002 monitoring report in the area of pre-kindergarten transition from Part C to Part B, the district did include this area in its presentation to Bureau staff. The district has a very systematic approach to transitioning students from Part C programs to Part B programs. The district often transitions children prior to the third birthday (up to six months prior) and until the child turns three, the child is able to receive early intervention services as well as services from the district. The district reported that often the children who have received early intervention services from birth and district services at the age of three can enter regular kindergarten with no need for continued services.

### **Parent Involvement**

There were no findings from the 2002 final monitoring report; however, the district provided Bureau staff with information related to this category. The district has employed a part-time parent liaison who works directly with parents of students with disabilities. He is available to attend IEP meetings at the request of the parents. The district also utilizes a parent specialist from Florida Diagnostic and Learning Resources System (FDLRS). This parent specialist was present and participated in the district presentation to Bureau staff. The parent specialist and parent liaison have worked together to strengthen the ESE School Advisory Committee (SAC) and provide SAC with vital information regarding the education of students with disabilities. To improve parent participation in the SAC meetings, the parent specialist encouraged the committee to develop their own procedures for how they wished to conduct their meetings. The

SAC chose to use the name “Parents Supporting ESE Children”. They also chose to have monthly meetings, with one meeting being a formal, informational meeting and the next being informal so that their children could attend. The informal meetings have activities for parents and children. Each meeting is advertised in the local newspaper and flyers are sent home with students. The district has developed a “team agreement” so that meetings are not used to air complaints. The ESE director attends every meeting and the superintendent has also attended meetings. The district should be commended in its efforts to increase parent involvement in the education of students with disabilities and is encouraged to continue those efforts.

## **Gifted**

Findings in the 2002 final monitoring report in the area of gifted were related to the need for staff development, curricula, and increased staff at the elementary, middle, and high school levels. Additional findings were related to the under-representation of minority students in the gifted program. Strategies implemented by the district to address the findings in the area of gifted are as follows:

- development of a committee to preview and research effective gifted curricula and materials at all levels
- visitation to effective gifted programs
- addition of teacher of gifted students
- provision of staff development for teachers of the gifted
- use of gifted screening for all children in kindergarten through second grade
- integration of “academically talented” students into gifted classes
- use of Sunshine State Standards (SSS) and “Program for the Gifted – Curriculum Design” from Duval County

The district has hired an additional teacher of the gifted who provides services to students at the elementary level. All elementary students get one full day of gifted services each week. Students from surrounding schools are bussed to the site where the gifted program is housed. Bureau staff visited the elementary gifted and talented classroom and observed a creative and thought-provoking lesson. Students at the middle school have one class period per day with the secondary gifted teacher. She also provides consultative services to students at the high school.

Based on the screening of primary elementary students, 206 students were identified for further evaluation. Of those 206 students, 11% are minority students. Evaluations are being completed by the district psychologist as well as contracted psychologists. To date, approximately 80 students have been evaluated for the gifted program during this school year. At the beginning of the 2003-04 school year, 16 students at the elementary level were identified as gifted. Currently, there are 34 gifted students at the elementary level. The current racial make-up of the district is 73% white and 27% minority; at the elementary level the current racial make-up of gifted is 94% white and 6% minority students. There are 60 students in the secondary gifted program with a racial make-up of 96% white and 4% minority. The district has completed all strategies identified in the system improvement plan related to the provision of gifted services. Addressing under-representation of minority students in gifted programs is the focus of the district’s continuous improvement monitoring plan; through this plan the district will continue its efforts to increase minority representation in the gifted program.

## **Student Records Review**

Seven areas of systemic findings were reported in the 2002 monitoring report in the area of student records; these findings were related to the failure to identify transition as a purpose of the IEP meeting, lack of measurable annual goals and objectives, failure to identify the student as being invited to the meeting, failure to provide procedural safeguards with the parent notice of meeting, inadequate statements regarding the effects of the disability, lack of interim progress reports, and inaccurate reporting of matrix cost factors. Strategies implemented by the district to address the area of student records include the following:

- intensive training for ESE teachers related to IEP development, scheduling of meetings, and general procedures
- use of ESE clerks to assist teachers with timeliness of IEPs and reevaluations and preparation of parent notices
- training for all ESE clerks
- development of IEP checklist
- development of IEP compliance log
- district random review of IEPs for compliance
- matrix training by FDLRS
- review of each matrix by district staff

Bureau staff reviewed 16 records of students with disabilities during the verification visit. Fourteen of those records were transition IEPs. All records were from the schools visited. Of those, five did not contain a majority of measurable goals; goals did not contain baseline measures from which to determine growth. IEP teams for those students will be required to reconvene to develop measurable annual goals. No funding adjustments result from the records review. The names of students requiring the reconvening of the IEP team were provided to the district in a letter dated February 27, 2004.

During the review of IEPs, it was found that four areas of noncompliance appeared to be systemic in nature. To be determined systemic, an item must be found noncompliant in at least 25% of the records reviewed. In Bradford County, at least four of the 16 records must have been noncompliant to be considered systemic. Systemic areas of noncompliance include the following:

- lack of transition having been identified as a purpose of the meeting (13 of 14 records)
- lack of evidence that the student was invited to the transition IEP meeting (8 of 14 records)
- lack of measurable annual goals (5 of 16 records)
- lack of progress reports that provided progress toward IEP goals (4 of 16 records)

In the 2002 monitoring report, 18 individual or non-systemic findings were reported. During the verification visit, some of the records contained instances of noncompliance that were not of a systemic nature. There were four areas of non-systemic findings; these individual findings are as follows:

- lack of procedural safeguards provided to the parent with the notice of IEP meeting (3 of 16 records)
- lack of progress reports provided to parents as often as reports provided to parents of nondisabled students (2 of 16 records)
- lack of or inadequate short-term objectives (2 of 16 records)

- inadequate statement indicating how the student’s disability affects the student’s involvement and progress in the general curriculum (1 of 16 records)

During the 2002 monitoring visit, Bureau staff discovered that a majority of IEPs and reevaluations for students with disabilities at the schools visited were not current or the data had not been updated to include the most recent IEP meetings and/or reevaluations. The verification visit confirmed that IEPs and reevaluations for students at the schools visited were current on the day of the visit and data had been accurately entered.

In addition to IEP reviews, the Bureau conducted reviews of three matrix of services documents for students reported at the 254 or 255 funding level. Of those reviews, the services identified on the matrix were in evidence on the IEPs.

The district showed a decrease in the areas of noncompliance related to student records. However, the district will be required to develop strategies to address IEP compliance and report them in its continuous improvement monitoring plan status report in June 2004. The district must conduct quarterly self-evaluations of the effectiveness of the strategies implemented, revise its training procedures as needed in response to those evaluations, and report the results of those evaluations to the Bureau through the semi-annual report of progress.

### **Special Category Records Review**

Findings in the 2002 report in the area of special category record reviews were related to dismissal procedures, transition from Part C to Part B, temporary placement, and initial eligibility. During the verification visit, Bureau staff reviewed two records from each of these categories. All special category records were found to be in compliance. The district has met all requirements in this area.

### **District Forms Review**

The following were findings during the 2002 monitoring visit in the area of forms review that required revisions:

- *Notice: Informed Notice of Dismissal*
- *Documentation of Staffing/Eligibility Determination*
- *Notice: Not Eligible for Exceptional Student Placement*
- *Confidentiality of Information Notice*

The district has corrected these forms. It is noted, however, that teachers in the district use two different sets of forms. The computerized forms are compliant. The forms on which teachers must manually enter information will require revisions in order for the district to continue using these forms. The staffing and placement form needs to have the words “approved” and “disapproved” replaced with “reviewed” by the ESE director or designee. The other handwritten forms which will need revision require two sources for the parent to contact if they have questions about the procedural safeguards and are as follows:

- *Notice: Informed Notice of Dismissal*
- *Informed Notice of Change of FAPE*
- *Informed Notice and Consent for Evaluation*
- *Informed Notice and Consent for Reevaluation*

### **Additional Compliance**

In addition to monitoring categories related to the 2002 final report, the Bureau also conducted interviews related to the provision of speech and language services and counseling as a related service. Through interviews and record reviews, it appears that the speech and language needs of students are being met. ESE teachers reported that communication needs are addressed through the IEP. If a student demonstrates a need beyond that which can be addressed through the curriculum, a goal is written and addressed by all teachers involved with the student. If the ESE teachers need assistance with writing or implementing appropriate communication goals, they consult with the speech/language pathologist at the school.

It was reported that counseling services are provided to students with disabilities who are in need of such services. It appears that counseling is routinely provided to students identified as emotionally handicapped (EH) and appears on the IEP as a related service. Interviewees reported that the decision related to the need for counseling is an IEP team decision and is discussed at the IEP meeting. When determining the need for counseling, the team considers past performance, behavioral issues, emotional factors, and the individual needs of the student. Counseling is available for any student who demonstrates a need, regardless of exceptionality; it is provided by school counselors, teachers, and Meridian Health Care. District staff reported that the district pays for counseling when provided by an outside agency. Parents also have the opportunity, through Meridian, to get family counseling with fees based on a sliding scale.

### **Summary**

The Florida Department of Education, Bureau of Instructional Support and Community Services conducted a verification monitoring visit to Bradford County District Schools on February 16-17, 2004. The visit served to verify that the district completed all strategies of the system improvement plan developed as a result of the random monitoring visit in May 2002.

Noncompliant areas in which a need for continued improvement is required will be addressed in the district's continuous improvement monitoring plan. The district's continuous improvement plan must be revised to incorporate these issues. The revised plan must be included with the district's continuous improvement status report submitted in June 2004. The areas of noncompliance are as follows:

- behavior/discipline
- student records/IEP compliance
- district forms

Through a district presentation by Ulysses Woods, Vicki Powell, Harvey Lofton, Deena Barnett, Cindy DeValerio, Carol Starr, and Michele Verunac, and on-site visits, the district demonstrated improvement in all areas except behavior management and discipline. While the district has completed the strategies of the system improvement plan resulting from the 2002 monitoring report, the district must submit a final status report in June 2004 related to this plan. The revision to the continuous improvement plan to include areas of noncompliance will serve to ensure that the district will continue to meet the requirements of the provision of services to exceptional students.