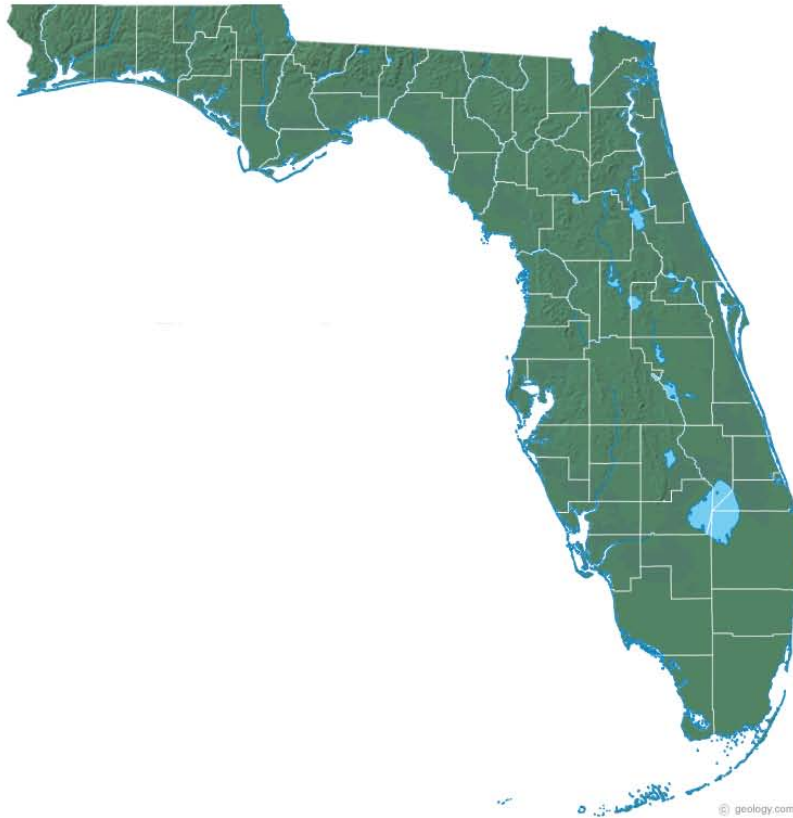


# Gulf County School District

Final Report: On-Site Monitoring

Exceptional Student Education Programs

April 22-23, 2009



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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# FLORIDA DEPARTMENT OF EDUCATION

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Commissioner of Education



June 22, 2009

Mr. Tim Wilder, Superintendent  
Gulf County School District  
150 Middle School Road  
Port St. Joe, Florida 32456-2261

Dear Superintendent Wilder:

We are pleased to provide you with the *Final Report of On-Site Monitoring of Exceptional Student Education (ESE) Programs* for Gulf County School District. This report was developed by integrating multiple sources of information related to our visit on April 22-23, 2009, including student record reviews, interviews with school and district staff, classroom observations, and the 2008-09 ESE compliance self-assessment conducted by the school district. The final report will be placed on the Bureau of Exceptional Education and Student Services' Web site and may be viewed at <http://www.fldoe.org/ese/mon-home.asp>.

The Gulf County School District was selected for an on-site monitoring visit due to the number of students reported for weighted funding through the Florida Education Finance Program. Specifically, the district's rate for students reported at the 255 cost factor was 200% or more than the state rate for the 2008 Survey 3. Ms. Deborah Crosby, ESE Director, and her staff were very helpful during the Bureau's preparation for the visit and the on-site monitoring. In addition, Bureau staff members were welcomed and assisted by the principals and other staff at both schools that were visited. The Bureau's on-site monitoring activities identified discrepancies between the level of services identified on the individual educational plans (IEPs), the matrix of services, and the documentation provided. An attachment has been included to detail these findings. Therefore, corrective action is required as a result of this visit.

**BAMBI J. LOCKMAN**

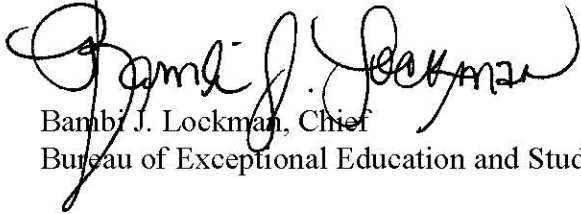
*Chief*

*Bureau of Exceptional Education and Student Services*

Superintendent Wilder  
June 22, 2009  
Page 2

Thank you for your continuing commitment to improve services for exceptional education for students in Gulf County. If there are any questions regarding this final report, please contact Patricia Howell, Program Director, Monitoring and Compliance, at (850) 245-0476, or via electronic mail at [patricia.howell@fldoe.org](mailto:patricia.howell@fldoe.org).

Sincerely,

A handwritten signature in black ink, appearing to read "Bambi J. Lockman". The signature is fluid and cursive, with the first name being the most prominent.

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

Enclosure

cc: George M. Cox, School Board Chairman  
Members of the School Board  
Charles Costin, School Board Attorney  
Deborah Crosby, ESE Director  
Melissa Ramsey, Principal, Port St. Joe Elementary School  
Juanise Griffin, Principal, Port St. Joe Middle School  
Kim C. Komisar  
Patricia Howell  
Jill Snelson

**Gulf County School District  
Final Report: On-Site Focused Monitoring**

**April 22-23, 2009**

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



# Gulf County School District

## Final Report: On-Site Monitoring April 22-23, 2009

### Table of Contents

Authority.....	1
Monitoring Process.....	1
District Selection.....	1
Matrix of Services.....	2
On-Site Activities.....	3
<i>Monitoring Team</i> .....	3
<i>Schools</i> .....	3
<i>Data Collection</i> .....	3
Results.....	3
Recommendations.....	5
Corrective Action.....	5
Technical Assistance.....	5
Publications.....	5
Glossary of Acronyms.....	7





# **Gulf County School District**

## **On-Site Focused Monitoring April 22-23, 2009**

### **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 ss. 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 (IDEA) is to assess and ensure the effectiveness of efforts to educate children with disabilities (s. 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 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.

#### **Monitoring Process**

##### **District Selection**

For the 2008-09 school year, the Bureau's ESE monitoring system, comprising **basic** (Level 1 monitoring) and **focused** (Level 2 monitoring) self-assessments, and **on-site visits** (Level 3 monitoring), was established to ensure that school districts comply with all applicable laws, regulations, and state statutes and rules, while focusing on improving student outcomes related to State Performance Plan (SPP) indicators.

Decisions regarding the components of Level 1 and Level 2 monitoring for 2008-09 were driven by: issues raised in recent Office of Program Policy and Governmental Accountability (OPPAGA) reports and legislative action regarding gifted education and matrix of services; issues addressed during the on-site monitoring of Florida's ESE programs by the Office of

Special Education Programs (OSEP); and the requirements of the SPP/Annual Performance Report (APR).

All districts were required to complete Level 1 activities. In addition, those districts that were newly identified for targeted planning or activities by the Bureau SPP indicator teams for one or more selected SPP indicators were required to conduct corresponding focused self-assessments (Level 2). Districts selected for Level 3 on-site monitoring also were required to conduct Level 1 activities and Level 2 activities as applicable. Preliminary selection of districts for consideration for Level 3 monitoring was based on the following, and resulted in the identification of 22 districts:

- >150% of the state rate for students reported at the 254 and 255 **matrix** levels (state rate for 254: 4.84%; 255: 2.08%; 254/255 combined: 6.92%)
- >150% of the state rate for formal requests for **dispute resolution** (state rate: 0.12%)
- **Correction of noncompliance** not completed within the required timeline (one year from identification)

On-site monitoring was reserved for those situations that require classroom observations or staff interviews, and cannot adequately be addressed through student record desk reviews (e.g., IEP implementation; services being provided in accordance with the matrix). The list of 22 districts was further narrowed by raising the limit for the matrix of services to 200% of the state rate, and consideration was given to any districts that met the criteria for selection in more than one area (matrix, dispute resolution, and correction of noncompliance).

In a letter dated March 6, 2009, Gulf County School District's superintendent was informed that the Bureau would be conducting an on-site monitoring visit related to the district's ESE programs, specifically related to matrix levels that were 200% or more of the state rate for 255.

### **Matrix of Services**

Section 1011.62(e), F.S., describes the State of Florida's funding model for exceptional student education programs using basic, at-risk, support levels IV and V for exceptional students, and career Florida Education Finance Program (FEFP) cost factors, and a guaranteed allocation for ESE programs. Exceptional education cost factors are determined by using a matrix of services to document the services that each exceptional student will receive. Within the matrix, five domains are used to group the types of services, and five levels are used to describe the nature and intensity of services within each domain. The total number of points is determined by adding together the scores for each domain and applicable special considerations and results in a rating of Level 1, Level 2, Level 3, Level 4, or Level 5.

In order to generate funds at weighted cost factors of 254 or 255, a matrix of services must be completed at least once every three years by personnel who have received approved training. The nature and intensity of the services indicated on the matrix are to be consistent with the services described in each exceptional student's individual educational plan (IEP). School districts must ensure that each matrix of services document reflects the student's current services. If services change as a result of an IEP team decision, a new matrix of services document must be completed. If services do not change as a result of an IEP team meeting, and the matrix is less than three years old, the existing document may be reviewed and remain in effect. Matrix of

services documents are required for McKay Scholarship students at all cost factor levels and may be completed for students with disabilities receiving services above Level 1 in Department of Juvenile Justice facilities and charter schools.

## **On-Site Activities**

### ***Monitoring Team***

On April 22-23, 2009, the following Bureau staff members conducted an on-site monitoring visit to review the matrix of services documents for the 32 students with disabilities enrolled in Gulf County who are currently reported for the 254 or 255 cost factors.

- Jill Snelson, Program Specialist (Team Leader)
- Patricia Howell, Program Director, Monitoring and Compliance
- Ken Johnson, Program Specialist

### ***Schools***

The following schools were selected for on-site visits based on the number of students with matrix of service cost factors of 254 and 255.

- Port St. Joe Elementary School (PSJE)
- Port St. Joe Middle School (PSJM)

IEPs and matrix of services documents from the following schools also were reviewed:

- Wewahitchka Elementary School
- Wewahitchka Middle School
- Wewahitchka High School
- Port St. Joe High School

### ***Data Collection***

Monitoring activities included the following:

- District-level interviews – 3
- School-level interviews – 5
- Record reviews – 32
  - IEPs
  - Matrixes of Services
  - Supporting documentation of services
- Classroom observations – 11
- Case studies – 11

## **Results**

The information reported here includes data collected through on-site monitoring as well as the review of Gulf County School District matrix of services documents and supporting documentation. Following this records review and the completion of on-site monitoring activities, the Bureau noted the following:

1. The atmosphere of both schools visited was overwhelmingly positive, with evidence of positive behavioral interventions and supports.

2. It is evident that the district endeavors to provide the appropriate level of services for this student population.
  - Students were actively engaged in class work assignments
  - Teachers and aides were readily available to provide assistance
  - ESE students participated in activities that included the general education students
3. The following concerns were noted:
  - Based on interviews conducted on-site, some staff members stated that they had never received matrix of services training. However, documentation was provided which confirmed the most recent matrix training for selected school district employees occurred on September 17, 2008.
  - Each of the 32 students reported at the 254 or 255 cost factors had a functional behavioral assessment (FBA) and behavioral intervention plan (BIP). For some of these students, inclusion of a FBA/BIP appeared to be based on district policy or practice rather than the significance of the students' needs in this area.
4. Findings of noncompliance included the following:
  - Twelve of the 32 records reviewed included funding levels that were not supported by the documentation initially provided by the district. After additional review, it was determined that for eight of these 12 students, classroom observations, staff interviews, and documentation indicated that these students were receiving the services specified on the IEPs at the funding level referenced on the matrixes; however, the supporting documentation was insufficient according to requirements stated in the *Matrix of Services Handbook*.
  - There were four students for whom neither the records reviews nor classroom observations and teacher interviews indicated that the services specified on their IEPs were provided at the funding levels referenced on the matrixes. The following discrepancies were noted:
    - Two of the four students were observed in instructional settings that did not provide a continuous 3:1 ratio that was intentional and maintained for those specific students as required for “intensive curriculum or instructional approach for most learning activities” in Domain A, Level 5 referenced on the matrix.
    - Three of the four students were observed in instructional settings that did not provide a continuous 3:1 ratio that was intentional and maintained for those specific students as required for “intensive, individualized behavior management plan that requires very small group or one-on-one intervention” in Domain B, Level 5 referenced on the matrix.
    - Two of the four students did not have a specific plan for personal assistance and/or supervision and staff allocated to provide the service for more than 50% of the school day as required for “personal assistance or supervision in activities of daily living, self-care, and self-management for most or all of the day” in Domain C, Level 5 referenced on the matrix.
    - For one of the four students, there was no evidence of a need for or provision for “multiple, continuous interventions to replace ineffective communication (e.g., selective mutism, echolalia) and establish appropriate communication” in Domain E, Level 5 as referenced on the matrix.

## Recommendations

The following are recommendations for the district to consider in its ongoing development and implementation of IEPs for students with disabilities, in particular regarding matrix of services documentation:

1. Present yearly training for all staff members regarding the matrix of services and required documentation.
2. Review all IEPs and matrix of services documents as required to ensure that current services are correctly captured as documented.
3. Establish procedures to ensure that all documentation required for the levels checked in the various domains on the matrixes is maintained and up-to-date.
4. Review criteria for the administration of FBAs/BIPs to assist in identifying these instances when this is required for the provision of FAPE and thus may be reported for well suited funding, and these instances when it is simply good practice and done for all similarly situated students.

## Corrective Actions

The matrix of services document must accurately reflect the current level of services being provided for the student as indicated on a student's IEP.

- No later than July 20, 2009, the Gulf County School District shall correct the funding levels within the Automated Student Information System database for the four students for whom on-site observations and interviews did not verify that these students were receiving the services on their IEPs at the funding levels referenced on the matrixes. Verification of this correction shall be provided to the Bureau no later than August 7, 2009.
- No later than June 30, 2009, the Gulf County School District shall reconvene the IEP teams of the other eight students for whom the funding levels were not supported by the documentation provided by the district or provide sufficient documentation to ensure that the matrix of services documents accurately reflect the special education and related services provided to the students. This documentation must be provided to the Bureau no later than July 15, 2009.

Specific student information is being provided to the district by a separate attachment.

## Technical Assistance

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 through the Bureau's Clearinghouse:

- <http://www.fldoe.org/ese/pdf/matrixnu.pdf> *Use of the Exceptional Student Education Matrix of Services*
- *Exceptional Student Education/Florida Education Finance Program (ESE/FEFP) Matrix of Services Handbook 2004*. Publication 309010B

The following is a partial list of Bureau staff available for future technical assistance in the completion or review of matrix of services documents:

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

Kim Komisar, Ph.D., Administrator  
[Kim.Komisar@fldoe.org](mailto:Kim.Komisar@fldoe.org)

Patricia Howell, Program Director  
Monitoring and Compliance  
[Patricia.Howell@fldoe.org](mailto:Patricia.Howell@fldoe.org)

Jill Snelson, Program Specialist  
Gulf County School District's  
Bureau-District Monitoring Liaison  
[Jill.Snelson@fldoe.org](mailto:Jill.Snelson@fldoe.org)

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

Kathy Dejoie, Supervisor  
[cicbiscs@FLDOE.org](mailto:cicbiscs@FLDOE.org)

**Appendix:**  
**Glossary of Acronyms**





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

**Glossary of Acronyms**

APR	Annual Performance Report
BIP	Behavioral intervention plan
Bureau	Bureau of Exceptional Education and Student Services
CFR	Code of Federal Regulations
ESE	Exceptional student education
FBA	Functional behavioral assessment
FEFP	Florida Education Finance Program
F.S.	Florida Statutes
IDEA	Individuals with Disabilities Education Act of 2004
IEP	Individual educational plan
OPPAGA	Office of Program Policy and Governmental Accountability
OSEP	Office of Special Education Programs
SPP	State Performance Plan



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

ESE 312985B