

CLAY COUNTY
Focused Monitoring

Exceptional Student Education Programs

October 9-13, 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.

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May 21, 2007

Mr. David Owens, Superintendent
Clay County School District
900 Walnut Street
Green Cove Springs, Florida 32043-3199

Dear Superintendent Owens:

We are pleased to provide you with the Final Report of Focused Monitoring of Exceptional Student Education Programs in Clay 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 October 9-13, 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 has worked with Dr. Daniel Becton, ESE Director, and his 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.

BAMBI J. LOCKMAN
Chief

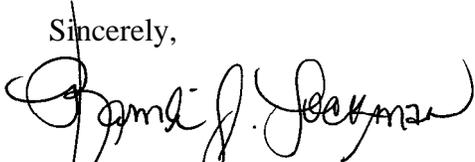
Bureau of Exceptional Education and Student Services

Superintendent Owens
May 21, 2007
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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 Clay 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: Carol L. Vallencourt, School Board Chair
Members of the School Board
Bruce Bickner, School Board Attorney
School Principals
Dr. Daniel Becton, ESE Director
Eileen L. Amy
Ginny Chance

CLAY COUNTY

Focused Monitoring

Exceptional Student Education Programs

October 9 - 13, 2006

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

Clay County Final Monitoring Report
Focused Monitoring
October 9 - 13, 2006

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Clay County Final Monitoring Report

Focused Monitoring

October 9 - 13, 2006

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.

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>.

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>.

Background Information and Demographics

During the week of October 9, 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 Clay County Public Schools. Dr. Daniel Becton, ESE Director, and Samantha Wright, ESE Coordinator, served as the coordinators and points of contact for the district during the monitoring visit. Clay County was monitored on the following indicators: transition/post school outcomes, and, disproportionate representation of racial and ethnic groups in special education and related services.

Based on the 2006 LEA Profile, Clay County School District has a total school population (PK-12) of 34,152 with 19% of students being identified as students with disabilities, 20% identified as speech impaired as the primary exceptionality and 3% identified as gifted. Clay County is considered a "medium size" district and is comprised of 22 elementary schools (one Pre-K-4 and

one Pre-K to 5), 5 middle/high schools (6-8 and 7-8), 1 combination school (7-12), and 1 alternative school. The district has no DJJ facilities or charter schools.

Clay County is a diverse community, with 25% of students on free or reduced lunch and 1% of students identified as limited English proficient. Of the students with disabilities who exited from the district during the 2004-05 school year, 54% met all requirements for a standard diploma, 12% met the requirements through a waiver of a passing score on the Florida Comprehensive Assessment Test (FCAT), and 4% 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 2% for all students and a dropout rate of 4% 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.

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 4,446 students (PK-12) with disabilities in Clay County School District for whom complete addresses were provided by the district. A total of 500 parents, representing 11.25% of the sample, returned the survey. When applying the standard of measure indicating their perception of schools' facilitation of parental involvement, 24.20% of parents of children ages 3-21 reported their perceived level of satisfaction at or above the standard.

Monitoring Activities

The Bureau conducted the on-site focused monitoring visit from October 9-13, 2006. Four Bureau staff members and seven peer monitors conducted site-visits to the following fourteen schools:

- Bannerman Learning Center
- Clay High School
- Doctors Inlet Elementary School
- Fleming Island Elementary School
- Grove Park Elementary School
- Middleburg High School
- Orange Park High School

- Orange Park Junior High School
- Ridgeview Elementary School
- Ridgeview High School
- S. Bryan Jennings Elementary School
- Thunderbolt Elementary School
- W.E. Cherry Elementary School
- Wilkinson Junior High 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 Clay County is included in the table below.

Activity	Source	Number
Interviews	District staff	8
	School staff	
	▪ School administrators/non-instructional support	27
	▪ ESE teachers—disabilities	38
	▪ ESE teachers—gifted	3
	▪ General education teachers	<u>26</u>
	Total	102
Focus Groups	Ridgeview High School—grades 9-12	
	▪ Students pursuing special diploma	9
	▪ Students pursuing standard diploma	<u>14</u>
	Total	23
Case studies	Individual student case studies	29
Classroom Visits	ESE and general education classrooms	54
Record Reviews	IEPs	
	▪ Targeted on-site review	139
	▪ Matrix of services documents	15
	EPs	
	▪ Targeted on-site review	<u>5</u>
	Total	159
Surveys	Parents of students with disabilities	
	▪ Number sent	4,446
	▪ Number returned (%)	500(11.25%)
	▪ School facilitates parent involvement	121(24.20%)

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 identification of students with specific learning disabilities (SLD) as well as 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.

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 December 11, 2006, the district was required to correct the items as noted. This letter identified the specific area(s) of a student's IEP for which an IEP Team meeting had to be held to correct the finding and/or specifies an action the district must perform to correct data. The Bureau has received documentation of these IEP team meetings.

In response to the findings included in the reporting table, the district is required to develop a system improvement plan. This plan is developed in consultation with the Bureau, and must include activities and strategies intended to address specific findings, as well as measurable evidence of change. A draft system improvement plan also is included.

**Clay County School District
Focused Monitoring**

Reporting Table

Standard/Citation	Findings	Supporting Evidence	Concerns
Indicator: Curriculum/Instruction (Standard Diploma)			
Related Factor: General			
	No finding of noncompliance in this area.		
Related Factor: IEP Requirements/Implementation			
Sec. 614(d)(1)(A)(i)(IV) §300.347(a)(3) 6A-6.03028(7)(c)	No finding of noncompliance in this area.		
Indicator: Performance on Statewide Assessment			
Related Factor: FCAT Waiver/Other Options			
	No findings of noncompliance in this area.		
Indicator: Child Find/Disproportionate Representation—Selected Disabilities			
Related Factor: Activities Required Prior to Referral (K-12 only)			
6A-6.0331(2)(d) 6A-6.0331(2)(f)	No findings of noncompliance in this area.		
Related Factor: Referral			
	No findings of noncompliance in this area.		
Related Factor: Evaluation			
	No finding of noncompliance in this area.		
Related Factor: Assessments			
	No findings of noncompliance in this area.		

Standard/Citation	Findings	Supporting Evidence	Concerns
Related Factor: Eligibility			
Sec. 618 (d)(2)(A) §300.755(b)	No findings of noncompliance in this area.	.	.
Indicator: Secondary Transition			
Related Factor: IEP Notice			
	No findings of noncompliance in this area.		
Related Factor: IEP Meeting			
	5 of 144 IEPs reviewed on-site lacked a current IEP on the day of review.	<i>Records:</i> The review of records at five schools documented that each school had 1 IEP that was not current.	10 of 10 IEPs reviewed on-site at Ridgeview High School, and 9 of 18 records reviewed at Orange Park High School documented no student participation in the IEP meeting.
Related Factor: IEP Contents			
	No findings of noncompliance in this area.		4 of 10 records reviewed at Ridgeview High did not document accommodations. The response given by district staff was that accommodations are embedded based on student exceptionality area(s).
Related Factor: Transfer of Rights			
	No findings of noncompliance in this area.		3 of 3 students interviewed in a Special Diploma focus group were unaware of the Transfer of Rights.
Gifted			
Related Factor: Eligibility			
	No findings of noncompliance in this area.		

Standard/Citation	Findings	Supporting Evidence	Concerns
Related Factor: Service Delivery			
	No findings of noncompliance in this area.		
Related Factor: EP Requirements/Implementation			
	No findings of noncompliance in this area.		
Matrix of Services			
S. 1011.62(1)(e), F.S.	9 of 15 matrixes of service documents require review/ revision after IEPS are reviewed.	<i>Records:</i> 9 of 15 matrixes did not support the level of services stated on the matrix.	
Student Record Reviews			
§300.320(a)(3)(i) and (ii) 6A-6.03028(7)(g)	<p>The present levels of academic and functional performance and annual goals and short term objectives or benchmarks do not support the services on the IEP.</p> <p>Lack of an explanation of the extent, if any, to which the student will not participate with non-disabled students in the general education class.</p>	<p><i>Records:</i> 13 of 144 total IEPs reviewed did not contain adequate present levels of academic and functional performance and annual goals and short term objectives or benchmarks did not support the services on the IEP</p> <p>22 of 144 total IEPs reviewed lacked an explanation of the extent, if any, to which the student will not participate with non-disabled students in the general education class.</p>	

Standard/Citation	Findings	Supporting Evidence	Concerns
	<p>Lack of majority of measurable goals.</p> <p>Lack of social/emotional goal/service for a student with Emotional Handicaps and present level of academic achievement and functional performance identifying a need.</p> <p>Lack of placement based on IEP team decision (parent disagreement with placement student remained in prior placement).</p>	<p>17 of 144 total IEPs reviewed lacked a majority of measurable goals.</p> <p>1 of 18 IEPs reviewed for a student identified as Emotionally Handicapped lacked address of social/emotional goals/service(s). Present level of academic achievement and functional performance identifying a need for services were also not addressed.</p>	
Review of District Forms			
<p>34 CFR §300.300 – 300.627 Rule 6A-6.03028, FAC</p>	<p>Four forms required revisions to meet compliance.</p>	<p>A detailed description of the forms review was provided to the district in a letter to the ESE Director dated January 12, 2007.</p>	

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.

- Teachers are complimentary of administration and ESE staff.
- General education teachers appeared to be well-versed in ESE strategies.
- A full continuum of placements is provided in Clay County.
- Placement decisions are made based on the need of the student.
- Frequent interaction between school personnel and appropriate agency contacts is documented in the folders of students enrolled in the culinary arts programs at Bannerman Learning Center .
- At Middleburg High School, a support facilitator helps facilitate transition for students going from more restrictive placements to less restrictive placements.
- After-school tutoring is offered to support students at Middleburg High School.
- At Ridgeview High School, department chairs of the ESE area meets with ESE students and regular education teachers to review progress.

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).

- Matrix of services reviewed indicated need for additional training in the completion of the matrix
- Consistency in personnel attending IEP meetings may need to be reviewed; many different faculty are involved in transition goals

- Training regarding writing accurate and complete present levels on IEPs
- Implement training to write measurable goals on IEPs
- Implement training/monitor completion of Matrix of Services to ensure accurate rating
- Implement a method of facilitating IEPs before the expiration of the current IEP
- Track IEPs to ensure they are completed on time.

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

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

Ken Johnson, Program Specialist
Ken.Johnson@fldoe.org

ESE Program Development and Services
(850) 245-0478

Cathy Bishop, Administrator
Cathy.Bishop@fldoe.org

Clearinghouse Information Center
cicbiscs@FLDOE.org
(850) 245-0477

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

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

Karen Denbroeder, Administrator
Karen.Denbroeder@fldoe.org

**Clay County School District
 Focused Monitoring
 System Improvement Strategies**

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.

Findings of Noncompliance	Improvement Strategies/Interventions	Outcome Measures and Timeline
Matrix of Services		
Nine matrix of service documents require review following review/revision of the corresponding IEPs.	District will submit both new IEPs and new matrixes for identified students to the Bureau for review and if needed, an amendment to the Automated Student Information System database.	June 30, 2007
Student Record Reviews		
IEP teams at 7 schools must reconvene to address identified findings.	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. Using protocols developed by the Bureau, school and/or district staff will conduct semi-annual compliance reviews of a random sample of 15 IEPs.	District report of self-assessment will document compliance with targeted elements for 100% of IEPs completed, received, and reviewed by the Bureau. December 2007

Appendix A:
ESE Monitoring Team Members

**Florida Department of Education
Bureau of Exceptional Education and Student Services
2006-07 Focused Monitoring
Clay County School District**

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

Barbara McAnelly, Program Specialist, Team Leader
Ginny Chance, Program Director
Laura Harrison, Program Specialist
Annette Oliver, Program Specialist

Peer Reviewers

Dwanette Dilworth, Marion County School District
Jim Fowler, Broward County School District
Toni Greenberg, Suwannee County School District
Amy Hanson, Flagler County School District
Kathy Nelson, Highlands County School District
Angela Spornraft, Hardee County School District
Angelyn Vaughan, Okaloosa County School District