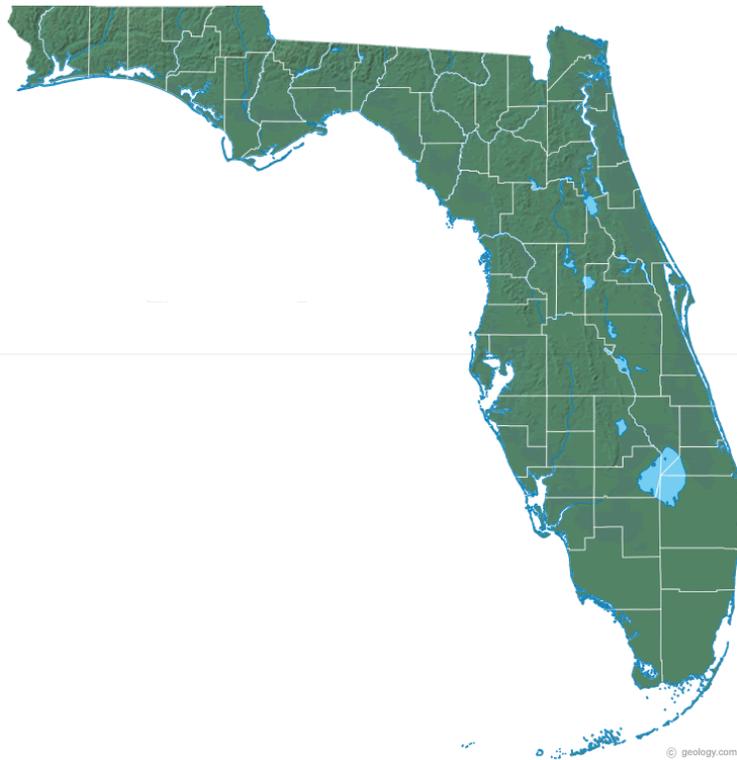


# Polk County School District

## Final Report: On-Site Monitoring Exceptional Student Education Programs

December 7-10, 2010



Bureau of Exceptional Education and Student Services  
Florida Department of Education

This publication is produced through the Bureau of Exceptional Education and Student Services Resource and Information Center (BRIC) of the Florida Department of Education. For more information on available resources, contact BRIC.

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March 2, 2011

Dr. Sherrie B. Nickell, Superintendent  
Polk County School District  
P.O. Box 391  
Bartow, Florida 33831

Dear Superintendent Nickell:

We are pleased to provide you with the *Final Report: On-Site Monitoring of Exceptional Student Education Programs* for the Polk County School District. This report was developed by integrating multiple sources of information related to an on-site visit to your district December 7–10, 2010, which included student record reviews, interviews with school and district staff, and classroom observations. The final report will be posted on the Bureau of Exceptional Education and Student Services' website and may be accessed at <http://www.fldoe.org/ese/mon-home.asp>.

The Polk County School District was selected for an on-site visit due to a pattern of poor performance over time as indicated in the State Performance Plan (SPP) indicator one, percent of youth with individual educational plans (IEPs) graduating from high school with a regular diploma, and SPP indicator two, percent of youth with IEPs dropping out of high school. In addition, the district's implementation of a problem solving/response to intervention (PS/RtI) process was reviewed during the on-site visit. Ms. Diane Callaway-Taylor, Director of Exceptional Student Education, and her staff were very helpful during the Bureau's preparation for the visit and during the on-site visit, as were Ms. Diana Myrick, Senior Director of Elementary Education, and Ms. Susan Jones, PS/RtI District Coach. The principals and other staff members at the schools visited welcomed and assisted Bureau staff members.

**BAMBI J. LOCKMAN**

*Chief*

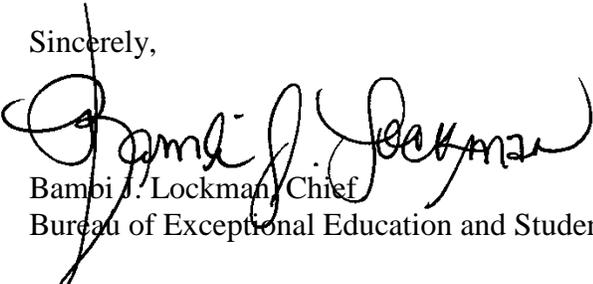
*Bureau of Exceptional Education and Student Services*

Dr. Sherrie B. Nickell  
March 2, 2011  
Page Two

The Bureau's on-site monitoring activities identified some discrepancies that require corrective action. The on-site visit also identified strengths and targets for support within the district's PS/RtI processes.

Thank you for your commitment to improving services for exceptional education for students in Polk 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 a large initial "B".

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

Enclosure

cc: Nancy Woolcock  
Diane Callaway-Taylor  
Diana Myrick  
Susan Jones  
Kim C. Komisar  
Patricia Howell  
Liz Conn  
Jill Snelson

**Polk County School District**

**Final Report: On-Site Monitoring  
Exceptional Student Education Programs**

**December 7–10, 2010**

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



**Polk County School District**

**Final Report: On-Site Monitoring  
SPP 1: Graduation and SPP 2: Dropout  
Problem Solving/Response to Intervention  
December 7–10, 2010**

**Table of Contents**

Authority ..... 1  
Monitoring Process ..... 1  
    District Selection..... 1  
    On-Site Activities..... 2  
        *Monitoring Team* ..... 2  
        *Schools* ..... 2  
        *Data Collection*..... 3  
        *Review of Records*..... 3  
Results ..... 3  
    Strengths ..... 3  
        *SPP 1 and SPP 2*..... 4  
        *PS/RtI* ..... 4  
    Concerns/Targets for Support..... 5  
        *SPP 1 and SPP 2*..... 5  
        *PS/RtI* ..... 5  
    Findings of Noncompliance..... 6  
        *SPP 1 and SPP 2*..... 6  
        *PS/RtI* ..... 6  
    Corrective Action..... 7  
Technical Assistance..... 8  
Glossary of Acronyms and Abbreviations..... 9



# **Polk County School District**

## **On-Site Monitoring SPP 1: Graduation and SPP 2: Dropout Problem Solving/Response to Intervention December 7–10, 2010**

### **Final Report**

#### **Authority**

The Florida Department of Education (FDOE), Bureau of Exceptional Education and Student Services (Bureau), 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 related to exceptional student education (ESE) (sections 1001.03(8) and 1008.32, Florida Statutes [F.S.]). One purpose of the Individuals with Disabilities Education Act (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]). In accordance with IDEA, the Bureau is responsible for ensuring that the requirements of the Act and the educational requirements of the State are implemented (34 CFR §300.149(a)(1) and (2)).

In fulfilling this requirement, the Bureau monitors 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 services; provides information and assistance to school districts; and otherwise assists school districts in operating effectively and efficiently. The monitoring system is designed to emphasize improved educational outcomes for students while ensuring compliance with applicable federal laws and regulations and State statutes and rules.

#### **Monitoring Process**

##### **District Selection**

Districts were selected for on-site monitoring during the 2010–11 school year based on the following criteria:

- Matrix of services:
  - Districts that report students for weighted funding at >150 percent of the state rate for at least one of the following:
    - 254 (> 7.38 percent)
    - 255 (> 3.15 percent)
    - 254/255 combined (> 10.53 percent)
  - Districts that report students for weighted funding at >125 percent of the state rate for two or more of the following cost factors:
    - 254 (> 6.15 percent)
    - 255 (> 2.63 percent)
    - 254/255 combined (> 8.78 percent)

- Pattern of poor performance over time in one or more targeted State Performance Plan (SPP) indicators, as evidenced by demonstrated progress below that of other targeted districts, and at least one of the following:
  - Targeted for a given SPP indicator or cluster of indicators for three consecutive years
  - Targeted for two or more SPP indicators or clusters of indicators for two consecutive years
- Problem solving/response to intervention (PS/RtI)
  - Eligible for on-site monitoring based on matrix of services or a pattern of poor performance over time on SPP indicators
  - Status as a pilot district for PS/RtI implementation; extent of implementation thus far

In a letter dated August 17, 2010, the Polk County School District superintendent was informed that the district was selected for a Level 3 on-site visit due to a pattern of poor performance over time as indicated in SPP 1, percent of youth with individual educational plans (IEPs) graduating from high school with a regular diploma, and SPP 2, percent of youth with IEPs dropping out of high school. In addition, the district's implementation of a PS/RtI process was to be reviewed during the on-site visit.

## **On-Site Activities**

### ***Monitoring Team***

During December 7–10, 2010, Bureau staff members conducted an on-site visit to discuss strategies in place to address graduation rates and dropout rates. Bureau members also met with district staff to discuss the district's implementation of a PS/RtI process as it carries out its child find obligation to identify and evaluate students suspected of having a disability. The following Bureau staff members participated in the on-site visit:

- Jill Snelson, Program Specialist, Monitoring and Compliance (Team Leader)
- Anne Bozik, Program Specialist, Monitoring and Compliance
- Mary Sue Camp, Consultant, Exceptional Student Education
- Liz Conn, Program Specialist, Monitoring and Compliance
- Clark Dorman, Consultant, PS/RtI
- Vicki Eddy, Program Specialist, Monitoring and Compliance
- Brenda Fisher, Program Specialist, Monitoring and Compliance
- Patricia Howell, Program Director, Monitoring and Compliance
- Sheryl Sandvoss, Program Specialist, Program Development and Services

### ***Schools***

The following schools were visited related to SPP 1 and SPP 2:

- Boone Middle School (BMS)
- Gause Academy (GA)
- Tenoroc High School (THS)

The following schools were visited related to PS/RtI and selected in collaboration with district staff to reflect different stages of implementation:

- Jesse Keen Elementary School (JKES)
- Spook Hill Elementary School (SHES)
- R. Bruce Wagner Elementary School (RBWES)

### ***Data Collection***

SPP 1 and SPP 2 on-site activities included the following:

- District-level interview – 7 participants
- Records reviewed – 18 students enrolled in grades six through twelve
- School-level interviews – 35 participants
- Student focus groups – 18 participants
- Case studies – 12 students enrolled in grades six through twelve

PS/RtI on-site activities included the following:

- District-level interviews – 2 participants
- School-level interviews – 40 participants
- Case studies – 18 students enrolled in grades one through five

### ***Review of Records***

The district was asked to provide the following documents for each of the 30 student records selected for the SPP 1 and SPP 2 reviews:

- Current IEP
- Previous IEP
- Discipline record
- Attendance record
- Functional behavioral assessment (FBA)/behavioral intervention plan (BIP), if any
- Current grade reports
- Any other supporting documentation as needed

The district also was asked to provide documentation related to the PS/RtI process for 24 students in three schools who had been evaluated during the past year. This information was used to examine implementation of PS/RtI across the district.

## **Results**

The following results reflect the data collected through the activities of the on-site visit as well as strengths, concerns and targets for support, and findings of noncompliance.

### **Strengths**

During the course of the on-site visits, it was noted that each of the schools was orderly and well-organized, professionalism of school staff and their commitment to students was evident. There was collaboration among staff members from different areas and school programs, and school administrators provided strong leadership and support to staff.

In addition, specific strengths identified during the visit related to SPP 1 and SPP 2 and the district's PS/RtI process are described below. There is a strong inter-relationship between the substance of the indicators (i.e., increasing the likelihood that a student with a disability will earn a standard diploma and decreasing the likelihood that a student with a disability will drop out of school) and implementation of an effective problem-solving framework.

### ***SPP 1 and SPP 2***

- A positive behavioral support (PBS) pep rally held at the beginning of the school year at JKES was so successful that students were still talking about it, and PBS clubs integrated into the school schedule provide students with valuable extracurricular experiences. The PBS incentive program at SHES was seen to be motivating to both students and teachers. Of particular interest was the point store that gives students the opportunity to use points to purchase gifts for others, thus encouraging them to feel good about giving, as well as the “positive back-up plan” for students who have not earned enough points for the reward activities. The schoolwide discipline intervention program at BMS was cited as an effective and positive initiative, as was the use of structured activities in the cafeteria during lunch to facilitate positive behavior at GA.
- Commitment to parent and community involvement is evidenced by the monthly parent open house night at BMS; the family night held twice per year at SHES to inform parents of learning resources they can use at home with their children; the community connections accessed to support programs at GA; and the volunteer tutoring program at RBWES that includes noninstructional staff who volunteer their own time to tutor children.
- Commitment of school staff to support and encourage students was evident through the use of staff mentors at GA and THS; reward programs that recognize outstanding students at THS; and the program at GA where students write about what they are learning and read their prose over the intercom.
- Notable efforts to prepare students for successful post-school experiences included the Career Lab at BMS; the use of online courses for credit retrieval; and the career-oriented video project at GA, which reflected the strong self-advocacy skills demonstrated by the students at THS.

### ***PS/RtI***

- The district reports that student performance has improved with the implementation of PS/RtI, in part due to the focus on ensuring that teachers are integral participants in the process and encouraging them to fulfill the roles of curriculum and problem-solving “experts.” This was evident through the sharing of effective instructional and behavioral strategies among the entire faculty at BMS, GA, and SHES; the comments by staff at JKES that reflect teacher support for PS/RtI as they focus on students’ individual needs and offset discipline referrals; and the remediation through PS/RtI of most struggling students prior to fourth grade at RBWES. SHES staff indicated that increasing integration of PS/RtI over several years enabled staff to move at a consistent, steady, and positive pace through the “paradigm shift.” Scheduling a 30-minute period into the school day for tier 2 group interventions has been a benefit at BRWES.
- Examples of effective data collection, reporting, analysis, and application include the use of Discovery Education assessments to track student progress at SHES and the system in place at RBWES that allows for monthly PS/RtI conferences between teachers and school leadership team members that include data review and brainstorming next steps for struggling students; classroom documentation graphed by administrative staff while teachers learn the process; user-friendly formats for staff to document intervention integrity; and tracking of individual student intervention and progress as they advance from grade to grade. Small group instructional sessions are reported to be more effective since implementation of PS/RtI, as teams identify appropriate interventions and curricular materials.

## **Concerns/Targets for Support**

### ***SPP 1 and SPP 2***

The following challenges and areas in need of additional support or technical assistance were noted during discussions with school and district staff and through record reviews:

- Although the district attendance policy is clearly stated within the student code of conduct, there did not seem to be a clear understanding of the policy and the need for a child study team review by teachers and staff. For example, one attendance policy letter included in a student's record noted that 16-year-old students are not subject to compulsory attendance, but did not include the requirements for parent notification and signature.
- As inclusion practices continue to be implemented and the course codes are amended, there is some confusion regarding ESE students being enrolled in the appropriate courses as they pursue a standard diploma.
- At one school, the behavioral unit was being utilized as a temporary disciplinary placement for general education students. District staff members assured the monitoring team that this practice was discontinued as soon as they learned about it during the on-site visit.

### ***PS/RtI***

The following challenges and areas in need of additional support or technical assistance were noted during discussions with school and district staff and through record reviews:

- Effective problem solving is a foundation for increasing student performance and requires teams to devote a significant amount of time analyzing and addressing the needs of groups of students as well as individual students. Finding sufficient time for all team members to meet is a challenge. In addition, strategies are needed to increase parent participation in and understanding of the process.
- Skill development on the part of problem-solving teams has focused on data collection and reporting. Additional instruction is needed regarding the problem-solving process itself, including using the data that are collected and reported to inform decisions regarding the nature and intensity of interventions, needs to be on-going. Specific topics on which to focus include the following:
  - Analyzing the gap between the performance of a given student and the benchmarks and between a given student and peer groups
  - Developing and testing hypotheses across multiple domains
  - Matching specific intervention programs with targeted skills
  - Developing and implementing support plans to ensure that the staff responsible for implementation of interventions have the required skills and resources
  - Establishing criteria for determining whether a student's response to intervention is sufficiently positive
  - Assessing integrity and fidelity of interventions, revising them or providing additional intervention programs for the sake of fidelity (when possible)
  - Implementing consistent and effective methods for documenting PS/RtI to ensure that an accurate record exists for each student while not imposing an undue burden on team members
  - Using graphical representations to present data
  - Including the full date on all graphs and other documentation

- Ensuring that identification and evaluation of students suspected of having a disability is timely and that implementation of PS/RtI does not inadvertently delay the evaluation process

## **Findings of Noncompliance**

### ***SPP 1 and SPP 2***

Noncompliance with the following standards was identified. Student-specific information needed for correction of noncompliance was provided to the district under separate cover.

- The appropriate team members were present at the IEP team meeting. (34 CFR §300.321(a)-(b))
  - In one of 18 records reviewed, the regular education teacher was not present at the IEP team meeting.
- The IEP contains a statement of special education services/specially designed instruction, including location as well as initiation, duration, and frequency. (34 CFR §300.320(a)(4) and (7))
  - In one of 18 records reviewed, the ESE services on the IEP did not match the services provided for the student.
- The IEP had been reviewed at least annually, and revised as appropriate, to address: any lack of progress toward the annual goals; any lack of progress in the general education curriculum, if appropriate; the results of reevaluation; information about the student provided to, or by, the parent; and/or the student's anticipated needs or other matters. (34 CFR §300.324(b)(1))
  - In one of 18 records reviewed, the prior IEP had lapsed for six months. The school district had found this error and corrected it.
- If a student has had at least five unexcused absences, or absences for which the reasons are unknown, within a calendar month or 10 unexcused absences, or absences for which the reason is unknown, within a 90-calendar-day period, the student's primary teacher must report that the student may be exhibiting a pattern of nonattendance. Unless there is clear evidence otherwise, the student must be referred to the school's child study team. If an initial meeting does not resolve the problem, interventions must be implemented. (Section 1003.26(1), F.S.)
  - In five of 18 records reviewed, the student's attendance pattern was not reported for consideration of a pattern of nonattendance.
- If the current IEP represents a change of placement or change of free appropriate public education (FAPE) from the previous IEP, or the district refused to make a change that the parent requested, the parent received appropriate prior written notice. (34 CFR §300.503)
  - In one of 18 records reviewed, a prior written notice was not provided for a change of placement for the student.

### ***PS/RtI***

During a problem-solving team meeting that Bureau staff observed, parents were asked to sign consent for evaluation, with no provision of notice of procedural safeguards or explanation of rights. This noncompliance was immediately corrected, prior to the dissemination of this report,

as the school provided the notice to the parents the following day, with an explanation via telephone.

### **Corrective Action**

**No later than March 21, 2011**, the Polk County School District must reconvene the IEP teams for the students noted above and correct the identified noncompliance. With the agreement of the parent and the district, the IEP may be amended without a meeting. If individual correction is not possible, the district must identify the policy, procedure, or practice that caused the noncompliance and provide evidence of the action taken to ensure future compliance. In addition, **no later than April 29, 2011**, the district must:

- Either demonstrate 100 percent compliance with the indicators in question through review of a random sample of five IEPs developed after December 10, 2010
- Or submit to the Bureau a corrective action plan (CAP) detailing the activities, resources, and timelines the district will employ to ensure that the compliance target of 100 percent will be met no later than one year from the date of receipt of this report. The CAP **must** include a periodic review of a random sample of five records developed after December 10, 2010, for the five standards of identified noncompliance, to be conducted until such time as the district demonstrates 100 percent compliance.

## Technical Assistance

Specific information for technical assistance, support, and guidance to school districts regarding IEP development can be found in the *Exceptional Student Education Compliance Manual 2010–11*. Technical assistance related to graduation rates and dropout prevention can be accessed through Project10: Transition Education Network at <http://www.project10.info/> and the National Secondary Transition Technical Assistance Center (NSTTAC) at <http://www.nsttac.org/>.

Specific information for technical assistance, support, and guidance to school districts regarding problem solving and response to intervention can be found on the Bureau's response to intervention website at <http://www.florida-rti.org/> and the specific learning disabilities (SLD) resource page at <http://www.fldoe.org/ese/sld.asp>.

## Bureau Contacts

The following is a partial list of Bureau staff available for technical assistance:

### **ESE Program Administration and Quality Assurance (PAQA)**

(850) 245-0476

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

### **PAQA – Monitoring and Compliance**

(850) 245-0476

Patricia Howell, Program Director  
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Sheryl Sandvoss, Program Specialist  
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[Sheryl.Sandvoss@fldoe.org](mailto:Sheryl.Sandvoss@fldoe.org)

### **BEES Resource and Information Center**

(850) 245-0477

Judith White, Supervisor  
[cicbiscs@fldoe.org](mailto:cicbiscs@fldoe.org)

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

**Glossary of Acronyms and Abbreviations**

Bureau	Bureau of Exceptional Education and Student Services
BIP	Behavioral intervention plan
BMS	Boone Middle School
CAP	Corrective action plan
CFR	Code of Federal Regulations
ESE	Exceptional student education
FAPE	Free appropriate public education
FBA	Functional behavioral assessment
FDOE	Florida Department of Education
F.S.	Florida Statutes
GA	Gause Academy
IDEA	Individuals with Disabilities Education Act
IEP	Individual educational plan
JKES	Jesse Keen Elementary School
NSTTAC	National Secondary Transition Technical Assistance Center
PBS	Positive behavior support
PS/RtI	Problem solving/response to instruction or intervention
RBWES	R. Bruce Wagner Elementary School
SLD	Specific learning disabilities
SHES	Spook Hill Elementary School
SPP	State Performance Plan
THS	Tenoroc High School



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

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