

FINAL REPORT OF VERIFICATION MONITORING OF
EXCEPTIONAL STUDENT EDUCATION PROGRAMS IN

POLK COUNTY

JANUARY 21 - 23, 2004



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

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Mr. Sherwin Holmes, Director
Exceptional Student Education
Polk County School District
P.O. Box 391
Bartow, Florida 33831

Dear Mr. Holmes:

Thank you for your hospitality during our recent verification monitoring visit, January 21-23, 2004. During the visit, the district provided a comprehensive and well organized status report in response to the final monitoring report from the March 2002 focused 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:

- student attendance
- 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 if we can be of any further assistance to your district.

Sincerely,

Michele Polland

Michele Polland, Acting Chief
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cc: R.J. Thornhill
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Eileen Amy
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MICHELE POLLAND
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**Polk County Final Monitoring Report
Verification Monitoring Visit
January 21-23, 2004**

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Polk County School District Verification Monitoring Visit January 21-23, 2004

From January 21-23, 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 Polk 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.

Polk County was selected for monitoring in 2002 on the basis of the percent of students with disabilities who drop out of school. 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 focused monitoring visit conducted March 18-22, 2002:

- staff knowledge and training
- student attendance
- dropout prevention strategies
- least restrictive environment
- behavior/discipline
- curriculum
- assessment
- post-school transition
- stakeholder opinions related to the indicator
- student 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 result of the 2002 focused 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 Polk County included a presentation related to the implementation of strategies identified in the system improvement plan based on categories from the final monitoring report. A manual, outlining all district activities related to the system improvement plan, was prepared and presented to Bureau staff. Sherwin Holmes, Director, Exceptional Student Education, served as the coordinator and point of contact for the district during the monitoring visit. In addition, district staff Deborah Johns and Karen Hyman made 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 Bartow Senior High School, Auburndale High School, and Haines City High 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, educational plans (EPs) for students identified as gifted, and the provision of counseling as a related service and speech and language services. School site visits included the following:

- 17 interviews with selected school and district staff
- four classroom visits
- reviews of six EPs for students identified as gifted
- reviews of 26 IEPs for students with disabilities, including matrix reviews for five of these students

Results

Staff Knowledge and Training

Findings from the 2002 monitoring report in the area of staff knowledge and training were related to the continued need for training for teachers to effectively provide instruction and accommodations. Strategies implemented to address the area of staff knowledge and training included the following:

- numerous staff development activities related to accommodations and modifications
- staff development related to Quality Designs for Instruction (QDI) for 37 schools
- development and dissemination of teacher “needs assessment” survey
- provision of district-level inclusion expert
- provision of support facilitators for each school (some facilitators are assigned to more than one school)
- training for support facilitators
- school-based training provided by support facilitators
- development and dissemination of an ESE handbook for all ESE teachers in the district

Interviews with school-level staff and reviews of student records at the visited schools verified the data presented by the district. Interviewees indicated that accommodations are being provided to students in general education classes based on decisions made at the IEP meetings. There was conflicting information at one school on how teachers are informed of the accommodations needs of individual students; some teachers reported that they are required to go to the student’s cumulative record to know what accommodations to provide, while others indicated that all teachers were given copies of the accommodations page.

Interviews with school staff and the review of student records confirmed that accommodations appear to be based on students’ needs. The district has fulfilled all requirements of this category and should be commended in its continued efforts to improve staff knowledge and training.

Student Attendance

Findings from the 2002 monitoring report in the area of student attendance were related to inconsistent implementation of district attendance policies. Strategies implemented by the district to address compliance in the area of student attendance included the following:

- review of district policies (related to attendance) with school-level staff

- use of attendance assistants to follow-up on students who are chronically absent
- use of various automated phone systems in 57 schools to call parents when students are absent

The review of student records indicates continued noncompliance in the area of student attendance. Of the 26 records reviewed, nine students' attendance reports showed at least five unexcused absences within a calendar month or at least 10 unexcused absences within a 90-calendar-day period. Section 1003.26(1)(b), Florida Statutes, indicates that the primary teacher of students with this many absences must report to the principal or his designee that the student may be exhibiting a pattern of nonattendance. The child must then be referred to the school's child study team to determine if early patterns of truancy are developing. Of the students who met the criteria to be referred to the principal and subsequently to the child study team, none had been referred to child study team, four had attendance identified as an area of need on the IEP, and only one had strategies to address attendance in the IEP. Documentation provided by the district indicated that attempts to address attendance problems were initiated on an individual basis; however, when one-on-one contact with the parent was not successful, no further interventions were attempted. The district will be required to add a measurable goal and benchmarks and develop strategies to address the issues related to student attendance in its revised continuous improvement monitoring plan and submit those to the Bureau with its June 2004 status report. Status reports related to the goals and benchmarks addressing attendance will be required in the December 2004 and June 2005 status reports.

Dropout Prevention Strategies

Findings and areas of concern from the 2002 monitoring report in the area of dropout prevention strategies included the lack of a coordinated district-wide dropout tracking system. Strategies implemented by the district to address this area include the following:

- development of a monthly list of students who have dropped out; provision of this list to adult schools
- provision of educational materials, including information about options available, to all students who have dropped out
- use of a transition specialist at Traviss Technical Center

The 2003 local educational agency (LEA) profile indicates that Polk County has a dropout rate for students with disabilities of 4%. This rate is equal to the rate of like sized districts and better than the state rate. The dropout rate for Polk County has decreased by 3% from the prior LEA profile. 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 some students were segregated from nondisabled peers during lunch and/or electives due to administrative convenience. According to the 2003 LEA profile, 42% 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 lower than the state average. In contrast, 56% 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 below the state average of 61%. Strategies implemented by the district to address this area included:

- designation of an inclusion coordinator
- implementation of full inclusion at two high schools
- implementation of inclusion at several middle schools
- staff training related to inclusion provided by Florida Inclusion Network (FIN)
- planning for and/or implementation of inclusionary practices at 43 schools
- development and implementation of a transition program at Florida Southern College and Warner Southern College

The district provided a detailed description of each of the above inclusionary activities implemented to address least restrictive environment. An example of one of the district initiatives was observed as Bureau staff visited one of the high schools which has implemented full inclusion. The school provides three levels of inclusion. One level is for students who need both accommodations and specially designed instruction in order to access the general curriculum. These students represent approximately 30% of the ESE population and are served in co-taught classes. The second level of inclusion is for students who need accommodations to the general curriculum. Support facilitators are provided for these students. These facilitators go into the general education classes two days per week and stay the entire class period to assist ESE students. The third level of inclusion is for students who are served through the consultative model and need no direct instructional services from an ESE teacher. A printout of ESE students at this school indicated that very few students are served at other than the regular class placement. A review of student records confirmed this. In addition, data provided by the district indicates that discipline reports for students with disabilities at this school dropped from 505 in 2001-02 to 117 in 2002-03, during the first year of implementation of the inclusion model. The district has completed all requirements in this area of the system improvement plan.

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:

- revision of district "Code of Conduct"
- development of discipline flowcharts
- provision of support facilitators at middle and high schools and clusters of elementary schools
- training related to FBAs and BIPs
- development of three year Positive Behavioral Support (PBS) plan
- training for administrators related to legal issues for students with disabilities
- provision of four academic and behavioral support teachers
- inclusion of behavior/discipline in the district continuous improvement monitoring plan

Interviews with school-level staff confirmed that training on the development and implementation of FBAs and BIPs has been provided. There were varying levels of comfort with the process. While one teacher develops color-coded charts and graphs to enable parents to better understand her student's behaviors, other teachers indicated that they require continued practice

and support in this area in order to develop more effective BIPs. The review of student records confirmed the use of BIPs for students who demonstrate a need.

Although 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 June 2004 status report, it is recommended that the district's continuous improvement plan be revised to include strategies to focus continued attention on conducting functional behavioral assessments and developing and implementing behavioral intervention plans.

Curriculum

Findings from the 2002 monitoring report in the area of curriculum were related to the provision of accommodations and access to career development and vocational education for students with disabilities. In addition to the strategies indicated in the staff knowledge and training category, the district has implemented the following strategies to address the area of curriculum:

- provision of Department of Education (DOE) handbook on accommodations to all ESE teachers
- implementation of district-wide reading program in primary ESE classes
- development of Test of Adult Basic Education (TABE) waiver to allow more ESE students to access classes at vocational schools
- provision of two county-wide vocational teachers to work with students with emotional handicaps (EH) and severe emotional disturbance (SED) population
- development and implementation of a transition program at Florida Southern College and Warner Southern College
- development and dissemination of a student vocational programs survey
- provision of curriculum guide to all parents

Documentation of varied vocational and career path opportunities was provided in the form of emails and surveys provided in the district notebook. Interviews with school staff verified the information presented by the district. All three high schools visited indicated that there are various vocational opportunities, including on-the-job training (OJT), community-based instruction (CBI), professional assessment exploration system (PAES) lab, and vocational classes available to students with disabilities. The review of student records and schedules confirmed that students are taking vocational and prevocational courses.

Polk County, in cooperation with Florida Southern College and Warner Southern College, has developed and implemented a unique transition program designed to provide students with disabilities from 18-22 the opportunity to participate with same-age nondisabled peers. On each campus the district has an ESE classroom for students on a modified curriculum who are pursuing a special diploma. The ESE students have the opportunity to audit certain college courses (physical education, art, etc.), and in return, students at the college gain hands-on experience in the ESE classroom.

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.

Assessment

Findings from the 2002 final monitoring report in the area of assessment were related to the lack of analysis of FCAT and routine assessment results. The district implemented the following strategies to address the area of assessment:

- development of academic improvement plans (AIPs) for all students with identified weaknesses in reading prior to referral for ESE evaluation
- use of computerized IEP which requires report of standardized tests as a part of the present level of educational performance statement

IEP reviews revealed continued noncompliance in the area of assessment. Although the computerized program requires a report of state and district assessments and standardized tests in the present level statement, this portion of the IEP is not consistently filled out. Eight of the 26 IEPs did not address the results of the student's performance on state or district assessments; three did not address the results of the initial or most recent evaluation. The district has completed all strategies indicated in the system improvement plan, however it will need to develop additional strategies to address the lack of evidence that state and district assessments were considered during the development of IEPs in its continuous improvement monitoring plan.

Post-School Transition

There were no findings in the 2002 final monitoring report in the area of post-school transition.

Stakeholder Opinion Related to the Indicator

Findings in the 2002 final monitoring report in the area of stakeholder opinion were related to lack of vocational opportunities and need for intensive instruction to remediate academic deficits. These areas have been addressed in the curriculum category.

Student Records Review

Findings in the 2002 final monitoring report in the area of student records were related to the reporting of initiation and duration dates of services, measurable annual goals and objectives, and the timeliness of IEPs and reevaluations for students with disabilities and educational plans for students identified as gifted at three high schools. Strategies implemented by the district to address the area of student records include the following:

- management information system (MIS) distribution of monthly printout indicating date of IEP review and reevaluation review
- use of computerized IEP to ensure initiation/duration dates of IEP are provided
- training for all instructional personnel in the use of computerized IEP
- use of measurable annual goal bank within the computerized IEP program
- IEP teams convened to develop IEPs for those students whose IEPs had lapsed

Bureau staff reviewed 26 records of students with disabilities and six records for students identified as gifted during the verification visit. All records were from the three schools visited. During the 2002 visit, records at these schools were found to be lapsed. All records reviewed during the verification visit were found to be current. However, eighteen of the 26 IEPs contained at least one goal that was not measurable. Of those, 11 did not contain a majority of measurable goals and IEP teams for those students will be required to reconvene to develop measurable annual goals. Of the records reviewed, eight will result in funding adjustments. The names of students requiring the reconvening of the IEP team, students for whom fund

adjustments will be required, and the reasons for those adjustments were provided in a letter to the district dated May 5, 2004.

In addition to IEP reviews, the Bureau conducted reviews of five matrix of services documents for students reported at the 254 or 255 funding level. Of those reviews, three were found to be inaccurately reported. The services identified on the matrix were not in evidence on the IEPs. The district will be required to correct the data for those students through the Automated Student Information System database for surveys 2 and 3 for the 2003-04 school year. The names and student numbers of the students for whom data must be corrected were provided in the aforementioned letter.

During the review of IEPs, it was found that seven 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 Polk County, at least seven of the 26 records must have been noncompliant to be considered systemic. Systemic areas of noncompliance include the following:

- lack of evidence that the parent was provided a copy of the IEP (9 records)
- lack of measurable annual goals (18 records)
- lack of correspondence between goals and objectives and the needs identified in the present level of educational performance statements (9 records)
- inadequate location of accommodations (9 records)
- lack of evidence that the results of state or district assessment were considered during the development of the IEP (8 records)
- lack of explanation of transition needs or why the student does not have needs in the transition domains (9 records)
- lack of prior informed notice of change of placement (7 records)

In addition, some of the records contained instances of noncompliance that were not of a systemic nature. These individual findings are as follows:

- lack of IEP on the first day of school (1 record)
- lack of the identification of transition as a purpose of the meeting (4 records)
- lack of appropriate persons being invited to the meeting (local education agency representative [LEA], student, general education teacher, agency representative) (5 records)
- lack of appropriate IEP team members present at the meeting (LEA, ESE teacher, interpreter of instructional implications) (6 records)
- inadequate present level of educational performance statements (4 records)
- lack of short-term objectives or objectives that did not relate to the goal (6 records)
- lack of evidence that the present level statements, goals, and objectives support the services on the IEP (3 records)
- lack of identification of special education services (1 record)
- lack of or inadequate identification of frequency of services (4 records)
- lack of or inadequate identification of location of services (6 records)
- inadequate identification of accommodations to the general curriculum (2 records)
- lack of initiation/duration dates of accommodations (1 record)
- lack of or inadequate frequency of accommodations (5 records)

- lack of indication how a student will be assessed when not taking state assessment (1 record)
- lack of explanation of extent to which the student will not participate with nondisabled peers (2 records)
- lack of progress report (1 record)
- lack of progress report as often as nondisabled peers received progress report (3 records)
- lack of evidence that the concerns of the parent were considered (2 records)
- lack of evidence that the results of the initial or most recent evaluation were considered (3 records)
- lack of evidence that the need for positive behavioral strategies or supports were addressed (2 records)
- lack of evidence that communication needs were addressed (1 record)
- lack of prior informed notice of change of free appropriate public education (FAPE) (3 records)
- lack of evidence that the diploma option was considered (1 record)
- inadequate course of study statement (5 records)
- lack of evidence that the student preferences were taken into account (1 record)
- lack of evidence that an agency representative was invited to attend (3 records)
- lack of notice of transfer of rights (3 records)
- lack of evidence of parental consent for reevaluation (1 record)

As a part of the verification visit, Bureau staff reviewed six EPs for students identified as gifted. Systemic findings were found in two areas. Three of the six records failed to adequately describe evaluation procedures for student outcomes. The district's Special Programs and Procedures for Exceptional Students (SP&P) requires that each student who participates in the gifted program will have a portfolio or representative products which document the work produced as a result of participation in the gifted program. Three of the records did not have an appropriately constituted EP team; Polk County's SP&P requires that the EP team have a "representative of the district school system, other than the student's teacher, who is qualified to provide or supervise the provision of special education" as a member of the team. For these three EPs, the student's teacher served in this capacity.

In addition, non-systemic findings in EPs were found in the following areas:

- lack of purpose of the meeting identified on the parent participation form (1 record)
- lack of evaluation criteria (1 record)
- lack of evaluation schedule (1 record)
- lack of student outcomes (1 record – this EP had district outcomes despite an August 31, 2001 directive from the Department of Education that this be removed from the EP)

The district will be required to develop strategies to address IEP and EP 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.

District Forms Review

The following were findings in the 2002 final monitoring report in the area of forms review that required attention at the next printing of forms:

- *Notice and Consent for Initial Placement*
- *Documentation of Staffing/Eligibility Determination*
- *Notice: Not Eligible for Exceptional Student Placement*

The district has corrected these forms.

The following were findings in the 2002 final monitoring report in the area of forms review that required immediate attention:

- *Notification of Change of Placement (and FAPE)*
- *Informed Notice of Dismissal*
- *Annual Notice of Confidentiality*

The *Annual Notice of Confidentiality* has been submitted and approved. The district is required to submit to the Bureau the district forms for *Notification of Change of Placement (and FAPE)* and *Informed Notice of Dismissal* for review and approval.

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 at two of the three schools visited indicated that they write communication goals for students who have a need in the area of communication. At the third school an ESE teacher indicated that she did not know of any students who needed communication goals but were not receiving them. 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. Mental health counseling is routinely provided to students identified as emotionally handicapped (EH) and appears on the IEP as a related service; this was confirmed through record reviews. Although school staff reported that counseling services would not be documented on the IEP for students other than those with emotional handicaps, district staff reported that any regularly scheduled counseling services determined by the IEP team to be a unique need of the student would be reflected on the IEP. Record reviews confirmed that students, in addition to those identified with emotional handicaps, also receive mental health counseling if they have a documented need. District staff reported that the district pays for counseling when provided by an outside agency.

Summary

The Florida Department of Education, Bureau of Instructional Support and Community Services conducted a verification monitoring visit to Polk County District Schools from January 21-23, 2004. The visit served to verify that the district had adequately met all requirements of the system improvement plan developed as a result of the focused monitoring visit in March 2002.

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 demonstrating continued need are as follows:

- student attendance
- student records
- district forms

Through a district presentation by Sherwin Holmes, Deborah Johns, and Karen Hyman, and on-site visits, the district demonstrated improvement in all areas. 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.