

FINAL REPORT: FOCUSED MONITORING VERIFICATION
EXCEPTIONAL STUDENT EDUCATION PROGRAMS

COLUMBIA COUNTY

FEBRUARY 2 - 4, 2005



FLORIDA DEPARTMENT OF EDUCATION
BUREAU OF EXCEPTIONAL EDUCATION AND STUDENT SERVICES

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June 15, 2005

Ms. Christine Bond, Director
Exceptional Education and Student Services
Columbia County School District
444 West Duval Street
Lake City, Florida 32055-3990

Dear Ms. Bond:

Thank you for your hospitality during our recent verification monitoring visit, February 2-4, 2005. During the visit, the district provided a comprehensive and well-prepared status report in response to the final monitoring report from the April 2003 focused monitoring visit. Visits to selected sites were conducted to verify information presented by the district. Bureau staff has reviewed additional information collected during the visit and a report of this visit is attached.

While the district has completed most of the strategies of the system improvement plan resulting from the 2003 monitoring visit, significant concerns regarding the development of individual educational plans (IEPs) and matrix of services documentation remain. Therefore, the district will be required to revise its system improvement plan (SIP) to more effectively address the development of IEPs that meet all state and federal requirements and to extend the duration date of the plan to May 2006. The plan must include quarterly self-reviews of student records to be conducted by the district and submitted to the Bureau for verification. The revised SIP must be submitted to the Bureau by July 15, 2005. In addition, the district will be required to revise its continuous improvement monitoring plan for gifted students to incorporate the provision of secondary services.

We appreciate your ongoing efforts on behalf of exceptional students. Please contact Dr. Kim Komisar, Program Director, at (850) 245-0476 or Suncom 205-0476 or via electronic mail at kim.komisar@fldoe.org if we can be of any further assistance to your district.

Sincerely,

A handwritten signature in cursive script, appearing to read "Bambi J. Lockman".

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

cc: Sam Markham, Superintendent
Eileen L. Amy
Kim Komisar

BAMBI J. LOCKMAN
Chief

Bureau of Exceptional Education and Student Services

**Final Report: Focused Monitoring Verification
Exceptional Student Education Programs
Columbia County**

February 2-4, 2005

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Final Report: Focused Monitoring Verification Exceptional Student Education Programs Columbia County

February 2 - 4, 2005

From February 2-4, 2005, the Florida Department of Education, Bureau of Exceptional Education and Student Services, conducted an on-site verification review of the exceptional student education (ESE) programs in Columbia 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.

Columbia County was selected for focused monitoring in 2003 based on the percentage of students with disabilities who graduated with a standard diploma. The district developed a system improvement plan (SIP) to address findings of noncompliance noted by the Bureau at that time. 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 April 14 – 16, 2003:

- general information
- access to the general curriculum
- decision-making process related to diploma option
- services to gifted students
- individual educational plans (IEPs)
- district forms

Additional areas addressed during this verification visit included:

- counseling as a related service, including psychological counseling
- speech and language services to students with communication needs
- transition services

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 SIP developed as result of the 2003 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.

Information outlining all district activities related to the system improvement plan was prepared and presented to Bureau staff. Christine Bond, Director, Exceptional Student Education, served as the coordinator and point of contact for the district during the monitoring visit. In addition, Robin Talley, ESE program coordinator, participated in the presentation. These participants should be commended for a presentation that was thorough, well prepared, and well executed; the written documentation verified the information presented orally.

In addition to the district presentation, the verification visit included site-visits to schools for the purpose of validating information provided during the district presentation and in the semi-annual reports submitted to the Bureau. Specific school visited were as follows:

- Niblack Elementary School
- Richardson Middle School
- Fort White High School

The visit included the following activities:

- 15 interviews with selected school and district staff
- reviews of 28 IEPs for students with disabilities
- reviews of five EPs for students identified as gifted
- reviews of five matrix of services documents

Results

General Information

This category includes background information specific to the district and the key data indicator (i.e., proportion of students with disabilities whose exit code indicates graduation with a standard diploma). Concerns were noted during the 2003 monitoring visit that the high mobility rate and possible errors in MIS data input may have contributed to Columbia County being selected for focused monitoring. The district has implemented the following strategies to address data accuracy concerns:

- district- and school-based data entry staff participated in MIS training in September 2003
- ongoing checks of student information were conducted in the second semester of the 2004 school year by district level resource teachers
- implementation of a new computerized IEP system
- district staff review data submitted by individual schools

Columbia County was selected for focused monitoring based on data from the 2001-02 school year that indicated that 30% of its students with disabilities who completed school that year graduated with a standard diploma. For the 2002-03 school year, the standard diploma rate increased to 54% (27% by meeting all requirements and 27% through the FCAT waiver process). Based on the most recent data reported to the DOE for the 2003-04 school year, 18% of students with disabilities graduated with a standard diploma (18% by meeting all requirements and none through the FCAT waiver process). This is inconsistent with the results of the district's own calculations, presented to Bureau staff during the monitoring visit. The district's data for its two high schools for the 2003-04 school year reveals a 47% standard diploma rate at Ft. White High school, including one student through the FCAT waiver process, and a 52% standard diploma rate at Columbia High School, including eight students through the FCAT waiver process. Based

on these results, the district will be required to request a data quality review from the DOE's Education Information and Accountability Services office in order to determine where errors are occurring and to ensure that student performance data reported to the DOE is accurate.

Access to the General Curriculum

This section includes information related to the way in which students with disabilities are provided access to the general curriculum as well as the effectiveness of that instruction.

Concerns noted in the 2003 monitoring report in the area of access to the general curriculum were related to the impact of block scheduling at Richardson Middle School. The majority of students with disabilities were provided instruction in varying exceptionalities classes taught by ESE teachers. The service delivery model in place at the school required some ESE teachers to teach both the general Sunshine State Standards and modified curriculum courses during the same class period. The district has implemented the following strategies to foster access to the general curriculum and placement in less restrictive environments for students with disabilities:

- restructuring courses at Richardson Middle School to allow for more flexibility in student scheduling
- guidance counselor at Richardson Middle School oversees course enrollment for students with disabilities to ensure placement in general education classes to the extent appropriate, based on the IEP
- resource/staffing specialist periodically conducts random reviews of IEPs and student schedules to ensure compliance pertaining to access to the general curriculum
- consultation services provided by a full-time ESE teacher at Columbia High School
- implementation of the FCAT waiver; incorporation of the waiver into the district's Student Progression Plan; referenced on the diploma option section of the IEP and reviewed at parent meetings
- opportunities for students with disabilities to participate in certificate programs at Lake City Community College
- participation in a collaborative effort with Florida Crown, a tutoring program for disadvantaged students
- participation in Project Connect
- plan to relocate students identified as trainable mentally handicapped to Columbia High School
- adult aged students identified as profoundly mentally handicapped co-located at Advocates for Citizens with Disabilities, Inc. (CARC)
- inclusion specialist hired to work at Niblack Elementary school
- 11 paraprofessionals hired to assist students district-wide in the mainstream for FCAT preparation
- two paraprofessionals at Fort White High School work one-on-one with students using the Great Leaps reading program
- inclusion program at Fort White Elementary School, with collaboration from the Florida inclusion Network (FIN)
- establish a middle school communication class at Lake City Middle School during the summer
- Integrate 20 students with disabilities at Happy House in the 3 and 4 year old program full-time with consultative services to the school readiness staff
- develop an assistive technology educational network satellite lab

- LATS team assists students with disabilities in the general education setting
- purchased Orchard Math Software for all grades K-12 in collaboration with technology grant and Title 1
- provided software and hardware enhancements for Compass computer lab at Columbia High School

Documentation provided by the district prior to and during the on-site visit confirmed these activities. Regular class placement rate (i.e., 80% or more of the school day with nondisabled peers) increased from 46% during the 2002-03 school year to 51% during the 2003-04 school year. Staff should be commended for their efforts to ensure continuity of services and to increase placement in less restrictive placements for students with disabilities.

The district has fulfilled the requirements of this category and is encouraged to continue to investigate additional methods for expanding and enhancing its inclusion efforts.

Decision-Making Process

This section includes information related to making decisions about a student's course of study and diploma option as well as to decisions regarding access to the general curriculum. The findings in the 2003 report indicated that restrictive settings at Fort White High School prevented students with disabilities from gaining access to the general curriculum. The district has implemented the following strategies to address the decision making process:

- meetings for parents and students held at the middle and high schools to provide information on courses of study and diploma options, February 2004
- revisions to the IEP to include additional information regarding diploma options
- training for ESE teachers on the revised IEP forms, including factors to consider when making placement, course of study, and diploma decisions

The district has fulfilled its requirements in this area and is encouraged to continue to address the development of quality IEPs through its on-going staff development activities.

Services to Gifted Students

This section provides information related to the district's gifted program across all grade levels. Findings in the 2003 final monitoring report in the area of gifted services indicated that there were no services for gifted student at the high school level. The district has implemented the following strategies to address gifted services:

- develop educational plans (EPs) for all gifted students
- the service delivery model for students identified as gifted is determined by the EP team, including consultation, dual enrollment, honors courses and leadership classes
- a secondary gifted workgroup is in the developmental stages

Gifted services for secondary students in Columbia County currently include honors courses, advanced placement classes, dual enrollment/early admissions to Lake City Community College, Santa Fe Community College or Florida Community College. Also available are vocational programs at the aforementioned community colleges for preparing students for technical careers. The district currently is addressing disproportionate representation of minority groups in the gifted program in its continuous improvement plan. The plan must be revised to ensure that

appropriate secondary gifted services are available to students who need them, including the strategies implemented by the secondary gifted workgroup.

Student Records Review

This section includes information related to the development of IEPs for students with disabilities as well as other documentation of procedures related to ESE services. Systemic findings are those findings of noncompliance on a given element or component of the IEP that occurs in 25% or more of the records reviewed. Systemic findings of noncompliance in the 2003 final monitoring report were related to inadequacy or lack of the following elements:

- participation of the general education teacher in the IEP team meeting
- present level of educational performance statements
- measurable annual goals
- correspondence between the present level of performance, annual goals, and short-term objectives or benchmarks
- description of special education services
- location of services
- initiation and duration dates, frequency, and location of accommodations and/or modifications
- present level, annual goals, and short-term objectives or benchmarks did not support the services on the IEP
- statement of progress toward the annual goals
- consideration of student performance on state- or district-wide assessment

In addition, during the 2003 monitoring visit there were two funding adjustments for lack of prior written notice of change of placement and five matrix of services documents were inaccurately reported for funding through the Florida Educational Funding Program (FEFP).

Strategies implemented by the district to address these compliance areas include the following:

- district forms have been modified to facilitate the inclusion of all required components, and additional revisions are underway
- training for district and school staff on the requirement to provide prior written notice of change of placement or FAPE
- district-wide training for all ESE instructional staff was provided through the DOE regarding the development of meaningful present level of educational performance statements and measurable annual goals
- matrix training for veteran teachers was conducted in September 2003; training for new teachers was conducted in February 2004
- computerized IEP program was implemented; the program automatically calculates the matrix totals to ensure accuracy
- the district is continuing to develop a system that will not allow certain levels on the matrix of services document to be checked unless key terms are used on the IEP

The ESE director reported that a prior written change of placement form has been developed and district staff are in the process of training teachers in its use. It will be fully implemented by the end of 2004-05 school year.

Bureau staff reviewed 28 records of students with disabilities during the verification visit; for 24 of the IEPs (79%), the IEP teams were required to reconvene in order to address specific findings. The district was provided with student-specific information related to these findings via letter dated March 1, 2005. The IEP teams for these students were required to reconvene to develop measurable annual goals, with evidence of compliance submitted to the Bureau by the end of the 2004-05 school year. This documentation has been provided. Systemic findings of noncompliance were related to inadequacy or lack of:

- annual goals and short-term objectives or benchmarks do not support the services on the IEP
- social/emotional goals for students identified as emotionally handicapped or severely emotionally disturbed
- consideration of student performance on state- or district-wide assessment
- initiation and duration dates of accommodations and/or modifications
- participation of the general education teacher in the IEP team meeting
- correspondence between the present level of performance, annual goals, and short-term objectives or benchmarks
- present level of educational performance statements
- description of special education services

In addition to IEP reviews, the Bureau conducted a review of five matrix of service documents for students reported at the 254 funding level. Three were found to be inaccurately reported. The district is required to provide an amendment to the data provided to the Department of Education (DOE) through the Automated Student Information System database for survey 5 for the 2003-04 school year and surveys 1, 2, and 3 for the 2004-05 school year. The district was provided with student-specific information related to these findings via letter dated March 1, 2005.

Due to the nature and extent of the findings of noncompliance during this verification visit, the district will be required to revise its SIP to more effectively address the development of IEPs that meet all state and federal requirements and to extend the duration date of the plan to May 2006. The plan must include quarterly self-reviews of student records to be conducted by the district and submitted to the Bureau for verification.

District Forms Review

All required corrections regarding district forms have been completed.

Additional Compliance Areas: Communication Services, Counseling as a Related Service and Transition Services

In addition to monitoring categories related to the 2003 final report, the Bureau also conducted interviews and record reviews related to: the way in which communication needs are addressed for students who are not eligible for the programs for students who are speech impaired or language impaired; the provision of counseling as a related service, including psychological counseling; and transition from school to post-school living for students with disabilities.

School-level staff reported that communication goals may be written for students who have a need in the area of communication but who are not eligible as speech or language impaired, or

that this area is incorporated into academic goals (e.g., language arts), and that the ESE teacher would provide instruction and/or support in that area. This was supported by the record reviews. There were no findings of noncompliance in this area.

District and school staff reported that counseling services are provided to students who demonstrate the need for such services. The district has a contract with the White Foundation to provide psychological and mental health counseling. Both group and individual counseling are available, depending on the needs of the individual student. Some staff reported that counseling services would be documented on the IEP while others indicated that they would not be. The records of two students in the program for students who are severely emotionally disturbed (SED) and eleven records for students in the program for students who are emotionally handicapped (EH) were reviewed. Neither of the two SED records reviewed included counseling as a related service; however, both students were receiving counseling from mental health counselor once per week through the White Foundation. Of the 11 IEPs of EH students reviewed, two included counseling as a related service and two students were reported as receiving counseling, although it was not documented as a related service on the IEP. The district will be required to incorporate staff training in the decision-making process and documentation requirements regarding counseling as a related service, including psychological counseling. In addition, the district must ensure that all students eligible as SED are receiving counseling as a related service in accordance with Rule 6A-6.03016, FAC, Special Programs for Students Who Are Emotionally Handicapped, and that the service is documented on students' IEPs. The system improvement plan must be revised to include this.

Regarding transition of students with disabilities from school to post-school living, school-level staff reported that agency representatives are invited to IEP meetings for students 16 years old or older, when appropriate, and that a district staff member arranges for agency participation. This was supported by the record reviews, which included documentation of agency invitation and participation.

The district must ensure students who need psychological counseling receive it and have it noted on their IEPs. There were no findings of noncompliance related to communication or transition services. The district should be commended on its efforts related to ensuring agency participation in transition planning for students with disabilities.

Summary

The Florida Department of Education, Bureau of Exceptional Education and Student Services conducted a verification monitoring visit to Columbia County District Schools from February 2-4, 2005 for the purpose of reviewing the effects of the strategies implemented by the district through its SIP. District and school level staff should be commended on their continued efforts in the areas of access to the general curriculum and the decision-making process related to student placement, course of study, and diploma option. The district continues to address services to gifted students at the high school level, and will be required to incorporate these efforts into its continuous improvement plan. Despite the district's implementation of strategies designed to ensure compliance with all federal and state requirements, the record reviews resulted in a significant number of substantive and procedural findings of noncompliance. As a result, the district will be required to revise and extend its SIP to address the findings of noncompliance. A revised system improvement plan is due to the Bureau by July 15, 2005.

Appendix A:

**System Improvement Plan
2005 Revision/Extension**

**Columbia County School District
Focused Monitoring Verification**

**System Improvement Plan:
2005 Revision/Extension**

This plan addresses those concerns and/or findings of noncompliance identified by the Bureau during verification monitoring as in need of improvement or corrective actions. The district is required to provide system improvement strategies to address identified findings, 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. The required duration for this revised and extended plan is May 30, 2006. For each issue, the plan also must define the measurable evidence of whether or not the desired outcome has been achieved. Target dates that extend for more than one year should include benchmarks in order to track interim progress. Findings identified as “ESE” are those findings that reflect issues specific to ESE students. Findings identified as “All” are those findings that reflect issues related to the student population as a whole, including ESE students. Semi-annual status reports are required to report on progress related to implementation and outcomes.

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Category	Findings	ESE	All	System Improvement Strategy	Evidence of Change
Access to the General Curriculum	No findings in this area.				
Decision-Making Process	No findings in this area.				
Services to Gifted Students	Findings in the 2003 final monitoring report in the area of gifted services indicated that there were no services for gifted student at the high school level. Currently gifted students are able to access dual-enrollment, and advanced placement and honors classes for some courses.	X		A secondary gifted workgroup is in the developmental stage. The district will revise its continuous improvement monitoring plan (CIMP) for gifted students to address the strategies identified by this work group.	The district will continue to provide semiannual reports of progress on the CIPM.
Student Record Reviews	Systemic findings of noncompliance were related to inadequacy or lack	X		The district will target the identified areas in its on-going	District report of self-assessment reveals

Category	Findings	ESE	All	System Improvement Strategy	Evidence of Change
Student Record Reviews (continued)	of: <ul style="list-style-type: none"> • annual goals and short-term objectives or benchmarks do not support the services on the IEP • social/emotional goals for students identified as emotionally handicapped or severely emotionally disturbed • consideration of student performance on state- or district-wide assessment • initiation and duration dates of accommodations and/or modifications • participation of the general education teacher in the IEP team meeting • correspondence between the present level of performance, annual goals, and short-term objectives or benchmarks • present level of educational performance statements • description of special education services 			IEP training and staff development activities. District staff will review a sampling of IEPs from all schools (at least 10), using the Bureau's work papers and source book for IEP reviews, to evaluate the effectiveness of the training and to ensure compliance with all state and federal requirements related to IEP development.	100% compliance on targeted elements. November 2005 May 2006
	Three of five matrix of services documents for students reported at the 254 or 255 levels were found to be inaccurate (60%).	X		The district will correct the data for the identified students through the Automated Student Information System database for surveys 1 and 2 for the 2004-05 school year.	District report of self-assessment reveals that all matrix records meet the requirements for IEP content and services provided.

Category	Findings	ESE	All	System Improvement Strategy	Evidence of Change
Student Record Reviews (continued)				The district will conduct a review of 5 matrix of services documents for records selected at random. Review materials provided by the Bureau will be used, and the data will be corrected through the ASIS database for records found to be in error.	November 2005 May 2006
	Twenty-four of the 28 IEPs reviewed were required to be reconvened to correct identified deficiencies.	X		Documentation of this corrective action has been provided to the Bureau.	
District Forms	No findings in this area.				
Communication Needs of Students with Disabilities	No findings in this area.				
Counseling as a Related Service	While counseling as a related service was evident on some of the IEPs reviewed, it was not documented on the IEPs of two SED students and two EH students, although mental health counseling was being provided to those students.	X		The district will incorporate staff training in the decision-making process and documentation requirements regarding counseling as a related service, including psychological counseling into its existing IEP training. District staff will review the records of all SED students to ensure that all students eligible as SED are receiving counseling as a related service in accordance with Rule 6A-	District report of self-assessment reveals 100% compliance with all requirements related to the provision of counseling as a related service, including psychological counseling. November 2005 May 2006

Category	Findings	ESE	All	System Improvement Strategy	Evidence of Change
Counseling as a Related Service (continued)				<p>6.03016, FAC, Special Programs for Students Who Are Emotionally Handicapped, and that the service is documented on students' IEPs.</p> <p>District staff will conduct quarterly assessments to evaluate the effectiveness of the training and to ensure compliance with all requirements related to the provision of counseling as a related service, including psychological counseling.</p>	