

STATE OF NEW JERSEY
DEPARTMENT OF EDUCATION
PO BOX 500
TRENTON, NJ 08625-0500

HADDON TOWNSHIP SCHOOL DISTRICT
500 RHOADES AVENUE
WESTMONT, NJ 08108
PHONE: (856) 869-7700



New Jersey K-12 Education

CONSOLIDATED MONITORING REPORT
DECEMBER 2014

District: Haddon Township School District
County: Camden
Dates On-Site: November 18 and 19, 2014
Case #: CM-012-14

FUNDING SOURCES

Program	Funding Award
Title I, Part A	\$ 126,202
IDEA Basic	587,350
IDEA Preschool	15,541
Title II, Part A	93,264
Title III, Part A	4,092
Total Funds	<u>\$ 826,449</u>

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BACKGROUND

The Elementary and Secondary Education Act (ESEA) and the Individuals with Disabilities Act (IDEA) and other federal laws require local education agencies (LEAs) to provide programs and services to their districts based on the requirements specified in each of the authorizing statutes (ESEA, IDEA, Race to the Top, and Carl D. Perkins). The laws further require that state education agencies such as the New Jersey Department of Education (NJDOE) monitor the implementation of federal programs by sub recipients and determine whether the funds are being used by the district for their intended purpose and achieving the overall objectives of the funding initiatives.

INTRODUCTION

The NJDOE visited the Haddon Township School District to monitor the district's use of federal funds and the related program plans, where applicable, to determine whether the district's programs are meeting the intended purposes and objectives, as specified in the current year applications and authorizing statutes, and to determine whether the funds were spent in accordance with the program requirements, federal and state laws, and applicable regulations. The on-site visit included staff interviews and documentation reviews related to the requirements of the following programs: Title I, Part A (Title I); Title II, Part A (Title II); Title III, Part A (Title III); IDEA Basic and Preschool and Race to the Top for the period July 1, 2013 through November 19, 2014.

The scope of work performed included the review of documentation including grant applications, program plans and needs assessments, grant awards, annual audits, board minutes, payroll records, accounting records, purchase orders, a review of student records, classroom visitations and interviews with instructional staff to verify implementation of Individualized Education Programs (IEP), a review of student class and related service schedules, interviews of child study team members and speech language specialists and an interview of the program administrator regarding the IDEA grant, as well as current district policies and procedures. The monitoring team members also conducted interviews with school personnel, reviewed the supporting documentation for a sample of expenditures and conducted internal control reviews.

EXPENDITURES REVIEWED

The grants that were reviewed included Title I, Title II, Title III; IDEA Basic and Preschool and Race to the Top from July 1, 2013 through November 19, 2014. A sampling of purchase orders and/or salaries was taken from each program reviewed.

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**GENERAL DISTRICT OVERVIEW OF USES OF TITLE I, TITLE II, TITLE III, IDEA
AND RACE TO THE TOP FUNDS**

Title I Projects

The district is using its FY 2014-2015 Title I funds to implement targeted assistance programs in two of its five elementary schools, Clyde E. Jennings and Van Sciver Elementary Schools and their middle school-William C. Rohrer Middle School. Primarily, the district provides tutoring services through in-class support, pullout programs, after school, and extended year programs. Title I funds in previous project periods were spent on similar programs.

Title II Projects

The district used its FY 2013-2014 Title II funds to provide professional development to teachers in literacy and mathematics through coaches and small group professional development sessions. Professional development activities were found to be in accordance with the District Professional Development Plan.

Title III Projects

The district has approximately 20 English Language Learners (ELL) in an English as a Second Language (ESL) program. Title III funds are used for supplies and materials. Title III Immigrant funds are used for extended day/year programs and a paraprofessional staff member.

IDEA Projects (Special Education)

The FY 2015 Individuals with Disabilities Education Act (IDEA 2004) Basic and Preschool funds are being used to reduce district tuition expenditures for students receiving special education services in private schools for students with disabilities. The nonpublic proportionate share funds are being used to provide supplemental tutoring and two classroom assistants for students attending Paul VI High School.

Race to the Top

The district expended all Race to the Top Funds in FY 2013-2014. The grant funds spent in FY 2013-2014 were used to support new teacher and leader evaluation systems.

DETAILED FINDINGS AND RECOMMENDATIONS

Title I

Finding 1: The district did not provide evidence that the established entrance and exit criteria were consistently applied to determine Title I student eligibility. The monitors were unable to verify the process used to select and serve Title I students.

Citation: ESEA §1115: *Targeted Assistance Programs.*

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Required Action: The district must establish a tracking mechanism for proper Title I student identification. This mechanism must include documentation of the use of multiple, educationally related, objective criteria to identify students for eligibility to receive Title I services.

Finding 2: The district's Title I parental notification letter did not include the multiple, educationally related, objective entrance and exit criteria used for Title I student identification, the remediation actions the district is using and the option for parents to decline Title I services for their child. This information is necessary for parents to understand the reasons their child was selected to participate in the Title I program, and what is needed for their child to exit the program.

Citation: ESEA §1115: *Targeted Assistance Schools*; ESEA §1118(c): *Parental Involvement (Policy Involvement)*.

Required Action: The district must revise its Title I participation letter to include the multiple, educationally related, objective criteria used to identify students for Title I services, and the criteria used to exit students from the Title I program. The letter must also include an opportunity for parents to opt-out of services. The district must provide a copy of its revised FY 2014-2015 Title I participation letter to the NJDOE for review.

Finding 3: The district did not provide sufficient evidence that its Title I schools convened an annual Title I parent meeting. Evidence was not provided that the Back-to-School Nights that occurred fulfilled the legislative requirements. Not conducting an annual meeting to explain the Title I legislation and the district's Title I programs does not allow parents of Title I students to be informed and vested in the Title I process.

Citation: ESEA §1118(c)(1) and (2): *Parental Involvement*.

Required Action: The district must convene the FY 2015-2016 annual Title I meeting for the parents/guardians of its identified Title I students in the beginning of the year. The district must submit evidence of convening this meeting to the NJDOE for review (invitational letter/flyer, agenda, meeting minutes, and sign in sheets must be obtained).

Finding 4: There was no evidence the district's parental involvement policy and the school-parent compact were developed in conjunction with Title I parents/guardians. The exclusion of parents/guardians in the development of these documents does not offer them the opportunity for full participation in their child's educational program.

Citation: ESEA §1118(c)(1) and (2): *Parental Involvement*.

Required Action: The district must provide evidence of inclusion of the associated stakeholder groups in the development of the parental involvement policy and school-parent compact, and evidence of the involvement of parents and families in the development and annual review process. The district must provide the NJDOE with

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evidence of the development of these documents with parents/guardians of the Title I students for the 2015-2016 school year.

Finding 5: The district did not provide school-level Title I parental involvement policies for all three Title I schools. Additionally, there was no evidence that the district policy was reviewed for the current school year. The annual review and current board adoption allow parents and other stakeholders to impact the parental involvement process and identify the unique needs of the Title I schools and Title I parents.

Citation: ESEA §1118(a)(2): *Parental Involvement (Written Policy)*; ESEA §1118(b): *Parental Involvement (School Parental Involvement Policy)*.

Required Action: The district must have both a written district parental involvement policy and school-level parental involvement policies developed in conjunction with parent input. Both policies must be evaluated annually. The district should provide technical assistance to its schools in the development of school-level parental involvement policies and ensure that its schools work with their stakeholder groups to develop the policies and review it annually. The district must submit copies of a recent board approved district parental involvement policy and school-level policies to the NJDOE for review. The district must also submit evidence of engaging parents in the development and review of the policies (meeting agendas, sign in sheets, minutes), and evidence of the board's adoption of the district-level policy (board meeting minutes).

Finding 6: The district's Title I schools did not provide information to parents in multiple languages. Schools are required to provide information to parents of students participating in Title I programs in a language that is understandable and in a uniform format, including alternative formats upon request.

Citation: ESEA §1118(b)(1): *Parental Involvement*.

Required Action: The district must have all required documents translated into a language that is understandable to the parents of the students served. The documents that must be in multiple languages are the District/School Parental Involvement Policy, Parent-School Compact and the Parents' Right to Know Letter, at a minimum. The district must submit copies of these documents to the NJDOE for review.

Finding 7: In the 2013-2014 grant year, the district ordered 30 iPads for use in its Title I funded after school program. However, Apple sent 80 iPads, so the district will return the balance of 50 iPads. However, instead of refunding the district, Apple will issue a credit on a District Volume Purchase Program Voucher Card. Upon receipt of the Apple credit, the district must apply a refund to the Title I grant.

Citation: *OMB Circular A-87, Section C, 4, Applicable Credits*.

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Required Action: The district must refund the cash equivalent of the District Volume Purchase Program Card to the 2014-2015 Title I grant. If the district does not expend the total amount of the refund/credit, then other Title I expenditures must be reduced by an equivalent amount.

Title II

A review of the expenditures charged to the Title II grant yielded no findings.

Title III

Finding 8: The district had a parental notification letter, but the letter did not outline all of the Title III parental notification requirements. Although the district had a parental notification letter for students identified as ELLs, there is no letter for parents that specifically outlines the requirements of Title III. The missing elements that need to be included in the parental notification letter are: how students will meet the state standards, students' level of English proficiency, how such level was assessed, how the program will meet the needs of the child in attaining English and meeting state standards, program exit requirements, expected rate of transition out of the program, and how the program will meet the objectives of an individualized education program of a child with a disability. This excludes parents from a complete understanding of the program their children are entering.

Citation: ESEA 3302 *Parental Notification*.

Required Action: The district's Title III parental notification letter needs to outline the specific requirements for Title III and then must be submitted for review.

IDEA (Special Education)

Finding 9: The district did not provide to students eligible for special education and related services a summary of academic achievement and functional performance prior to graduating and/or aging out.

Citation: N.J.A.C. 6A:14-4.11(b)4; 20 U.S.C. §1414(c)(5)(B); and 34 CFR §300.305(e)(3).

Required Action: The district must ensure that students are provided with a summary of academic achievement and functional performance prior to graduation that addresses all required components. In order to demonstrate correction of noncompliance, the district must conduct training for child study team members regarding the procedures for implementing the requirements in the citation listed above. A monitor from the NJDOE will conduct an on-site visit to interview staff, review the summaries of performance provided to eligible students at the conclusion of the 2014-2015 school year, and to review the oversight procedures.

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Finding 10: The district did not document all required considerations and statements in each IEP. IEPs for students eligible for special education and related services did not consistently include:

- age 14 post-school transition components;
- age 16 post-school transition components; and
- specific location and method for providing related services.

IEPs for students eligible for speech-language services did not include:

- specific location and method for providing services; and
- IEP special considerations.

Citation: N.J.A.C. 6A:14-3.7(c)1-11, (e) 1-17, and (f), 4.10(a); 20 U.S.C. §1414(d)(3)(A)(B); and 34 CFR §300.324(a)(1)(2).

Required Action: The district must ensure each IEP contains the required considerations and statements. In order to demonstrate correction of noncompliance, the district must conduct training for child study team members and speech-language specialists and develop an oversight mechanism to ensure compliance with the requirements in the citations listed above. In addition, to demonstrate correction of individual instances of noncompliance, the district must conduct annual review meetings and revise IEPs for the specific students whose IEPs were identified as noncompliant. A monitor from the NJDOE will conduct an on-site visit to interview staff, review the revised IEPs and a random sample of additional IEPs developed at meetings conducted between January 2015 and April 2015, and to review the oversight procedures. The names of the students whose IEPs were identified as noncompliant will be provided to the district by the monitor. For assistance with correction of noncompliance, the district is referred to the state IEP sample form which is located at: www.statenj.us/education/specialed/forms.

Finding 11: The district did not consistently document in the IEPs of students removed from the general education setting for more than 20 percent of the school day, including students placed in separate settings, consideration of placement in the least restrictive environment. Specifically, IEPs did not consistently include:

- the supplementary aids and services considered, and/or an explanation of why they were rejected;
- a comparison of the benefits provided in the regular class and the benefits provided in the special education class;
- the potentially beneficial or harmful effects which a placement (general education) may have on the student with disabilities or the other students in the class; and
- for those students placed in separate settings, activities to transition the student to a less restrictive environment.

Citation: N.J.A.C. 6A:14-4.2 (a)8(i),(ii) and (iii), 4.2(a)4.

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Required Action: The district must ensure when determining the educational placement of a child with a disability, the IEP team considers the general education class first and all required decisions regarding placement are documented in the IEP for each student removed from general education for more than 20 percent of the school day. The district must also ensure for students placed in separate settings, the IEP team identified activities to transition the student to a less restrictive environment and document them in each IEP. In order to demonstrate correction of noncompliance, the district must conduct training for child study team members and develop an oversight mechanism to ensure compliance with the requirements in the citations listed above. To demonstrate that the district has corrected the individual instances of noncompliance, the district must conduct annual review meetings and revise the IEPs for the specific students that were identified as noncompliant. A monitor from the NJDOE will conduct an on-site visit to interview staff, review revised IEPs, review a random sample of additional IEPs developed at meetings conducted between January 2015 and April 2015, and to review the oversight procedures. The names of the students whose IEPs were identified as noncompliant will be provided to the district by the monitor.

Finding 12: The district did not conduct multidisciplinary initial evaluations for students referred for speech-language services by obtaining an educational impact statement from the classroom teacher.

Code Citation: N.J.A.C. 6A:14-2.5(b)6 and 3.6(b).

Required Action: The district must ensure that a multidisciplinary evaluation is conducted for students referred for speech-language services by obtaining a statement from the general education teacher that details the educational impact of the speech problem on the student's progress in general education. In order to demonstrate correction of noncompliance, the district must conduct training for speech-language specialists and develop an oversight mechanism to ensure compliance with the requirements in the citations listed above. A monitor from the NJDOE will conduct an on-site visit to interview staff, review initial evaluation reports developed between January 2015 and April 2015, and to review the oversight procedures.

Finding 13: The district did not consistently conduct all required sections of the functional assessment as a component of an initial evaluation for students referred for special education and related services. Specifically, evaluations did not include observation of the student in other than a testing setting.

Citation: N.J.A.C. 6A:14-2.5(b)6 and 3.6(b), 3.3(e) and 3.4, w.4(f)4(i-vi); 20 U.S.C. §1414(b)(1-3); 1412(a)(6)(b); and 34 CFR §300.304(b)(1).

Required Action: The district must ensure that all components of a functional assessment are conducted for students referred for an initial evaluation. In order to demonstrate correction of noncompliance, the district must conduct training for child study team members and develop an oversight mechanism to ensure compliance with the

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requirements in the citations listed above. A monitor from the NJDOE will conduct a site visit to interview staff, review initial evaluations conducted between January 2015 and April 2015, and to review the oversight procedures.

Finding 14: The district did not consistently provide to students beginning at age 14, written invitations to meetings where post-school transition was being discussed.

Citation: N.J.A.C. 6A:14-2.3(k)2x and 3.7(e)13, 3.7(h); 20 U.S.C. §1414 (d)(1)(A)(i)(1)(VIII); and 34 CFR §300.322.b(2).

Required Action: The district must ensure that each student with an IEP age 14 or older is provided with a written invitation to any IEP meeting where transition to adult life will be discussed. A monitor from the NJDOE will conduct an on-site visit to interview staff, review student invitations for transition IEP meetings conducted between January 2015 and April 2015, and to review the oversight procedures.

IDEA

A review of the expenditures charged to the IDEA grant yielded no findings.

Race to the Top

A review of the expenditures charged to the Race to the Top grant yielded no findings.

Administrative

Finding 15: The district does not have formal written internal control policies and procedures to prevent contracting with disbarred vendors.

Citation: EDGAR, PART 80-*Uniform Administrative Requirements for Grants and Cooperative Agreements to State and Local Governments*, Section 36, Procurement.

Required Action: The district must update its procedures to demonstrate implementation of the internal control policies to prevent errors from potentially occurring.

The NJDOE thanks you for your time and cooperation during the monitoring visit and looks forward to a successful resolution of all findings and implementation of all recommendations contained in this report.

If you have any questions, please contact Frank Basso via phone at (609) 984-5909 or via email at frank.basso@doe.state.nj.us.

State of New Jersey
Department of Education
Office of Fiscal Accountability and Compliance

PROCEDURES FOR LEA/AGENCY RESPONSE
CORRECTIVE ACTION PLAN AND RECONSIDERATION PROCESS

Board of Education Response:

Pursuant to N.J.A.C. 6A:23A-5.6, the following actions shall occur:

- (a) Any school district or county vocational school district that has been subject to an audit or investigation by the Department of Education, Office of Fiscal Accountability and Compliance (OFAC) shall discuss the findings of the audit or investigation at a public meeting of the district board of education no later than 30 days after receipt of the findings.
- (b) Within 30 days of the public meeting required in (a) above, the district board of education shall adopt a resolution certifying that the findings were discussed in a public board meeting and approving a corrective action plan to address the issues raised in the findings. The resolution shall be submitted to the OFAC within 10 days of adoption by the board of education.
- (c) The findings of the OFAC audit or investigation and the board of education's corrective action plan shall be posted on the district's web site, if one exists.

If the board of education disputes any of the findings of the audit or investigation, it may, within 10 days of adoption of the resolution, seek an OFAC reconsideration of any disputed finding(s). Seeking a reconsideration of the findings does not preclude adherence to the provisions of (a), (b), and (c) listed above.

Corrective Action Plan:

The corrective action plan is to be used when the LEA/Agency is in agreement with any of the findings. To contest a finding, the reconsideration process must be used. After the reconsideration is settled, a corrective action plan must be filed for any finding upheld during the reconsideration process.

The corrective action plan must be prepared by completing the attached form. The LEA/Agency must submit the following information:

- Recommendation number
- Corrective action (approved by the board)
- Method of implementation
- Person responsible for implementation
- Completion date of implementation

If the corrective action plan is acceptable, a letter will be sent to the LEA/Agency indicating that it has been accepted.

If the corrective action plan is not acceptable, a letter will be sent to the LEA/Agency indicating whether further clarification is required or further action is necessary.

Reconsideration Process:

The reconsideration process is used to contest disputed findings.

Within 10 days of the board's adoption of the resolution approving a reconsideration of the findings of the audit or investigation, a written request by the LEA/Agency to review the disputed finding(s), recommendation(s), or questioned costs must be submitted to the OFAC Director. The Request for Reconsideration must indicate the finding(s) in question.

The Request for Reconsideration must be in writing and the LEA/Agency must present any supporting documentation for the reconsideration. Subsequent to the submission of the Request for Reconsideration, the OFAC Director will issue a written decision.

If the final determination made by the Director, is still unsatisfactory to the LEA/Agency, the LEA/Agency may file a Petition of Appeal pursuant to N.J.A.C. 6A:3-1.3.

**NEW JERSEY DEPARTMENT OF EDUCATION
OFFICE OF FISCAL ACCOUNTABILITY AND COMPLIANCE
CORRECTIVE ACTION PLAN**

SCHOOL DISTRICT NAME _____ COUNTY _____

TYPE OF EXAMINATION: _____

DATE OF BOARD MEETING: _____

CONTACT PERSON _____

TELEPHONE NUMBER _____ FAX NUMBER _____

RECOMMENDATION NUMBER	CORRECTIVE ACTION	METHOD OF IMPLEMENTATION	INDIVIDUAL RESPONSIBLE FOR IMPLEMENTATION	COMPLETION DATE OF IMPLEMENTATION
			INDIVIDUAL	COMPLETION

Chief School Administrator _____ Date _____ Board Secretary/Business Administrator _____ Date _____

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OFFICE OF FISCAL ACCOUNTABILITY AND COMPLIANCE
CORRECTIVE ACTION PLAN**

RECOMMENDATION NUMBER	CORRECTIVE ACTION	METHOD OF IMPLEMENTATION	RESPONSIBLE FOR IMPLEMENTATION	DATE OF IMPLEMENTATION

Chief School Administrator _____

Date _____

Board Secretary/Business Administrator _____

Date _____