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New Jersey K-12 Education

CONSOLIDATED MONITORING REPORT
AUGUST 2016

District: Passaic Public Schools
County: Passaic
Dates On-Site: April 26, 27 and 28, 2016
Case #: CM-035-15

FUNDING SOURCES

Program	Funding Award
Title I, Part A	\$ 8,377,858
IDEA Basic	5,454,135
IDEA Preschool	132,617
Title II, Part A	1,037,462
Title III	1,212,974
Carl D. Perkins	58,434
Total Funds	<u>\$ 16,273,480</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 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 Passaic Public Schools 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; IDEA Basic and Preschool; and Carl D. Perkins for the period July 1, 2014 through March 31, 2016.

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 district personnel, reviewed the supporting documentation for a sample of expenditures and conducted internal control reviews.

EXPENDITURES REVIEWED

The grants reviewed included Title I, Title II, Title III, IDEA Basic and Preschool and Carl D. Perkins from July 1, 2014 through March 31, 2016. 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 AND IDEA FUNDS

Title I Projects

At the time of the on-site visit, the district had 13 Title I eligible schools served. The district conducts a Title I targeted assistance program in School No.17 and Schoolwide programs in the remaining 12 schools, including eight Focus schools. The district blended a portion of the Title I allocation and budgeted the remaining portion for instructional and support salaries and benefits; professional development; parental involvement activities; instructional supplies and materials; and administrative costs.

IDEA Projects

The district utilized the FY 2014-2015 and FY 2015-2016 IDEA Basic and Preschool funds to reduce district tuition costs for students receiving special educational services in other public school districts and approved private schools for students with disabilities. IDEA funds were also used for the provision of related services for students who attend nonpublic schools located in the district. In addition, the district utilizes 15 percent of its IDEA funds for Coordinated Early Intervening Services. These funds support seven reading interventionists to support identified at-risk students in grades K-6.

Carl D. Perkins Funds

Findings related to the Carl D. Perkins Grant were not available at the time this report was issued.

DETAILED FINDINGS AND RECOMMENDATIONS

Title I

Finding 1: For School No.17, the Title I parental notification letters did not include detailed entrance and exit criteria used for Title I student identification and an opt-out option. 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. Additionally, parents need to be informed that their child's participation in the program is optional.

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

Required Action: For School No.17, the district must ensure the Title I participation letter is revised to include the specific multiple, educationally related, objective entrance and exit criteria used to identify and exit students for Title I services respectively. Additionally, the letter must include language for parents to opt-out of the program. The

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district must provide copies of School No.17's revised FY 2016-2017 Title I participation letter to the NJDOE for review.

Finding 2: The district did not have a parental involvement program that reflected the requirements of the Title I legislation. There was no evidence that the district Title I parental involvement policy was board adopted since May 2014, and that school-level Title I parental involvement policies were developed with parental input. The Title I parental input allows parents and other stakeholders to impact the parental involvement process and identify the unique needs of the parents of Title I students.

Citation: ESEA §1118(a)(2): *Parental Involvement (Local Educational Agency Policy)*; ESEA §1118(d): *Parental Involvement (Shared Responsibilities for High Student Academic Achievement)*.

Required Action: For FY 2016-2017, each of the district's Title I schools must develop school-level parental involvement policies. In addition, the district Title I parental involvement policy must be board adopted for FY 2016-2017, and both the district and school-level parental involvement policies must be developed with parental input. The district must submit evidence (e.g., meeting agendas, sign in sheets, and minutes) of current board approval and parental input into the development of both the FY 2016-2017 school-level and district-level Title I parental involvement policies to the NJDOE for review.

Finding 3: For FY 2015-2016, the district provided documentation of the January 21, 2016 "Title I District Parent Advisory Council" and school-level parent meetings conducted during March 2016 as evidence of fulfilling the required Title I annual parent meeting. Based on the documentation, the monitors were unable to ascertain that the parent meetings met all the legislative requirements for the Title I annual meeting. Not conducting an annual meeting in the beginning of the school year to explain the legislation and the schools' Title I programs to parents of participating students, did not allow the parents to be informed and vested in the Title I process from the beginning.

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

Required Action: The district's Title I schools must annually convene their FY 2016-2017 annual Title I meetings for the parents/guardians of participating students no later than mid-October. The schools must sufficiently document the meetings and submit evidence of each school's annual meetings (e.g., invitational letter/flyer, agenda, meeting minutes, and sign in sheets) to the NJDOE for review.

Finding 4: The district contracted with a third-party provider, Catapult Learning, LLC (Catapult), to provide equitable Title I services to eligible resident nonpublic school students. In the contract, the equitable service amounts allotted for Title I professional development and parental involvement activities, plus the specific criteria used to identify and exit students eligible for Title I services were not specified. Additionally, the Catapult contract was agreed

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upon on March 23, 2016 after the board adopted a resolution to amend the award to Catapult on August 31, 2015. As a result, the monitors could not ascertain whether Catapult was providing nonpublic professional development and parental involvement services in accordance with both the FY 2015-2016 ESEA Consolidated Subgrant Application and the associated contract.

Citation: ESEA §1120: *Participation of Children Enrolled In Private Schools*; Uniform Guidance 2 CFR 200.302, Financial management.

Required Action: If the district utilizes Catapult to provide all Title I nonpublic services for FY 2016-2017, the district must work with Catapult to ensure that the executed contract is comprehensive and stipulates all Title I services to be provided in accordance with the Title I statute and regulations.

Finding 5: The district did not provide enough oversight of the Title I nonpublic services provided by Catapult. The teacher time report submitted by Catapult to the district was not signed by either the principal of the nonpublic school and/or the teacher providing services. Catapult only provided a blanket monthly statement as to the accuracy of the teacher's time sheets. Additionally, the billing documentation did not support that administrative costs were billed on an ongoing basis and paid as services were rendered

Citation: ESEA §1120: *Participation of Children Enrolled In Private Schools*; Uniform Guidance 2 CFR 200.302, Financial management.

Required Action: If the district utilizes Catapult to provide Title I nonpublic services for FY 2016-2017, the district must work with Catapult to ensure that the supporting documentation such as teacher time reports are signed by both the individual that provides the Title I nonpublic services and the district. The district may no longer accept periodic blanket statements by the vendor to assure the accuracy of the time reports. If any administrative costs are incurred, the billing and payment of the costs are according to the five percent cap and not upfront, but as services are rendered.

Finding 6: The Schoolwide Stakeholder Engagement Committee representation at each school did not consistently include at least one of each of the following: community member; parent representative not affiliated with the district's board of education; and non-instructional staff member. The timing and number of Schoolwide Stakeholder Engagement Committee meetings documented at each school was inconsistent throughout the district.

Citation: ESEA §1114(b): *Schoolwide Programs (Components of a Schoolwide Program)*.

Required Action: The district's Title I schoolwide schools must expand their Title I Schoolwide Stakeholder Engagement Committees to include the aforementioned representatives. The Title I Schoolwide Stakeholder Engagement Committees should meet at a minimum on a quarterly basis. The district must send an updated list of the

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Schoolwide Stakeholder Committees for each of its Title I schoolwide programs to the NJDOE for review. The list must include the person's name and constituent group.

Finding 7: The district's Title I Schoolwide Plans were not consistent and lacked key components. Specific feedback for each of the Schoolwide Plans were given to the district to work with the individual schools to address.

Citation: ESEA §1114(b): *Schoolwide Programs (Components of a Schoolwide Program)*.

Required Action: For FY 2016-2017, the district and the schools must revisit the Schoolwide Plan planning processes to ensure that the plans address the feedback given at the monitoring visit and the additional technical assistance from NJDOE personnel regarding specific plan deficiencies. Failure to complete all components of the FY 2016-2017 Schoolwide Plan may result in the revocation of the schools' approval to operate a schoolwide program.

Finding 8: The School Improvement Plans (SIPs) including priority/focus initiatives and budgeted costs were not reflective of the eight Focus school-level allocations. Instead, the SIPs reflected the priority/focus intervention reserve only.

Citation: ESEA §1114: *Schoolwide Programs*; ESEA §1120A(b): *Fiscal Requirements (Federal Funds to Supplement, Not Supplant, Non-Federal Funds)*.

Required Action: For FY 2016-2017, the district must work with its respective Regional Achievement Center to reflect all school-level programs, salaries and activities, including the corresponding budget in the SIPs. Failure to complete a FY 2016-2017 SIP that reflects the expenditure of school-level allocations may result in the revocation of the schools' approval to operate a schoolwide program.

Finding 9: The district provided FY 2015-2016 time activity reports and weekly calendar/plans for Title I paid personnel, but these documents separately did not include all the necessary information to ascertain that the Title I personnel were paid in accordance with the Title I services provided.

Citation: Uniform Guidance 2 CFR 200.430, Compensation-Personal Services.

Recommended Action: For FY 2016-2017, the district needs to combine the information on the time activity reports and weekly calendar/plans on one document. The district must submit sample timesheets for FY 2016-2017 to the NJDOE for review. The district can consult and utilize one of the templates referenced in the NJDOE's December 2012 guidance on *Time and Effort Reporting for Title I Funded Staff*, which is located at: [http://education.state.nj.us/broadcasts/2012/DEC/18/8649/Time and Activity Reporting.pdf](http://education.state.nj.us/broadcasts/2012/DEC/18/8649/Time_and_Activity_Reporting.pdf)) as a resource.

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Title II

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

Title III

Finding 10: The district's use of Title III funds for salaries of three English as a Second Language teachers totaling \$61,582.41, supplanted state and local funds. Expenditures for salaries were for program services that are required in the absence of federal funds. The prorated amount for non-allowable activities by teacher are as follows:

- Thomas Jefferson School No. 1 (Grades K, 1, 3, 4-6 ESL Pull-Out) - \$31,896.20;
- M.J.D. School No. 3 (Grades K ESL Push-In, Grades 3-6 ESL Pull-Out) - \$18,609.84; and
- M.J.D. School No. 3 (Grades 1-2, 405 ESL Pull-Out) - \$11,076.37.

Citation: ESEA §3115(g) Subgrants to Eligible Entities Supplement, Not Supplant.

Required Action: The district amended its current year grant and the amendment was approved in the Electronic Web Enabled Grant system to reflect funds in the amount of \$65,000 allocated to schoolwide-blended. No further action is required.

IDEA (Special Education)

Finding 11: The district did not properly identify the funding source in students' Service Plans (SP) where students are receiving services in nonpublic settings.

Citation: 34 CFR §§300.321 through 300.324; and See 34 CFR §300.138(b)(2)(ii).

Required Action: The district must ensure that students who are parentally placed in a nonpublic school and are receiving IDEA services have SP's that meet the required components, including identifying the proper funding source for delivery of services. In order to demonstrate correction of noncompliance, the district must conduct training for child study team members and/or the agency with which the district has designated to provide the services, 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 the SP's from meetings conducted between November 2016 and February 2017, and to review the oversight procedures.

Finding 12: The district did not conduct meetings within 20 calendar days of receipt of a written request for evaluation for students referred for special education and related services and for students referred for speech-language services.

Citation: N.J.A.C. 6A:14-3.3(e).

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Required Action: The district must ensure a meeting is conducted within 20 calendar days of receipt of a written request for evaluation to determine if an evaluation is warranted. 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 citation listed above. A monitor from the NJDOE will conduct an on-site visit to interview staff, review the dated initial request for evaluation from the resulting meetings conducted between November 2016 and February 2017, and to review the oversight procedures.

Finding 13: The district did not consistently complete transition planning for students ages 16 and above and document decisions in the IEP. Specifically, IEPs did not include:

- Postsecondary measurable goal in the IEP and updated annually; and
- Postsecondary goal(s) based on age appropriate transition assessment.

Citation: N.J.A.C. 6A:14-3.7(e)11.

Required Action: The district must ensure that transition is discussed at each IEP meeting for students age 16 or above, and that decisions are documented in the 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 citation listed above. To demonstrate the district has corrected the individual instances of noncompliance, the district must conduct annual review meetings and revise the IEPs for specific students with IEPs that were identified as noncompliant. A monitor from the NJDOE will conduct an on-site visit to interview staff, review the revised IEPs along with a random sample of IEPs developed between November 2016 and February 2017, 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 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 34 CFR §300.322(a)(2).

Required Action: The district must ensure each student with an IEP age 14 or above is provided with a written invitation to any IEP meeting where transition to adult life will be discussed. 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. A monitor from the NJDOE will conduct an on-site visit to interview staff, review copies of invitations to IEP meetings to students age 14 and above for meetings conducted between November 2016 and February 2017, and to review the oversight procedures.

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Finding 15: The district does not have a policy for the provision of accommodations and modifications or, when appropriate, an alternate assessment for students with disabilities participating in district wide assessments.

Citation: 34 CFR §300.158-300.161.

Required Action: The district must revise its policies and procedures to ensure students with disabilities participate in district wide assessments and each IEP contains a statement of any individual modifications to be provided to the student in the administration of district wide assessments. The policy must include the provision of accommodations and modifications and the provision of alternate assessments for those children who cannot participate in the regular assessment. If the district reports publicly on the district wide assessment, the district must also report with the same frequency and in the same detail as it reports on the assessment of nondisabled children. 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 review the policy.

Administrative

Finding 16: On several occasions, the district failed to issue a purchase order prior to goods being purchased or services being rendered (confirming order). District policy and state regulations require that a properly executed purchase order be issued prior to the purchase of goods or the rendering of services.

Citation: Uniform Grant Guidance 2 C.F.R. 200.302; N.J.S.A. 18A:18A(2)(v) Public School Contracts Law.

Required Action: Purchase orders should be issued to all vendors prior to goods or services being provided.

Recommendation 1: The purchase order for the Title I nonpublic services regarding Catapult was signed solely by the district's Supervisor of Special Education and not by the ESEA Project Director.

Citation: Uniform Guidance 2 CFR 200.302, Financial management.

Recommended Action: For FY 2016-2017, the district should have individual(s) familiar with Title I nonpublic requirements and Title I authority review and sign-off on Title I nonpublic service expenses.

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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 Steven Hoffmann via phone at (973) 621-2750 or via email at steven.hoffmann@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 APPEAL 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 file a written appeal with the OFAC of any disputed finding(s) within 10 days of adoption of the resolution. Seeking an appeal 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 appeal process must be used. After the appeal is settled, a corrective action plan must be filed for any finding upheld during the appeal 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.

Appeal Process:

The appeal process is used to contest disputed findings.

Within 10 days of the board's adoption of the resolution approving an appeal 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 Appeal must indicate the finding(s) in question.

The Request for Appeal must be in writing and the LEA/Agency must present any supporting documentation for the appeal. Subsequent to the submission of the Request for Appeal, 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 Passaic Public Schools **COUNTY** Passaic

TYPE OF EXAMINATION: Consolidated Monitoring Report- Corrective Action Plan

DATE OF BOARD MEETING: September 26, 2016

CONTACT PERSON Rachel Goldberg, Assistant Superintendent of Curriculum and Instruction

TELEPHONE NUMBER (973) 470-5213 **FAX NUMBER** 973-470-8984

RECOMMENDATION NUMBER	CORRECTIVE ACTION	METHOD OF IMPLEMENTATION	INDIVIDUAL RESPONSIBLE FOR IMPLEMENTATION	COMPLETION OF DATE OF IMPLEMENTATION
<p>FINDING 1: ESEA §1115: Targeted Assistance Schools; ESEA §1118(c): Parental Involvement (Policy Involvement)</p>	<p>The district must ensure that the Title I participation letter for School No. 17 is revised to include specific multiple, educationally related, objective entrance and exit criteria used to identify and exit students for Title I services. The letter must include the option for parents to opt-out of the program.</p>	<p>The district will revise the letter to include specific, multiple, educationally related, objective entrance and exit criteria used to identify and exit students for Title I services. Additionally the letter will inform parents about opting out of the program. The letter in English and Spanish will be provided to the NJDOE.</p>	<p>Director of Elementary and Secondary Education Supervisors of Language Arts, Pre-K-3, and 4-8 and Supervisors of Mathematics Pre-K-5, and 4-8 Principal of School No. 17</p>	<p>October 15, 2016</p>
<p>FINDING 2: ESEA §1118(a)(2): Parental Involvement (Local Educational Agency Policy): ESEA §1118(d): Parental Involvement (Shared Responsibilities for High Student Academic Achievement).</p>	<p>The district must ensure that each of the Title I schools develop school-level parent involvement policies. The policies must be board adopted for FY 2016-2017, and both the district and school-level parental involvement policies must be developed with parental input.</p>	<p>The district will plan meetings with Parent Liaisons, parents, Teacher Coordinator-Parents and Director of Student Advocacy to review the Parent Involvement Policy. The district will submit evidence in the form of agendas, minutes, flyers, and sign-in sheets to the NJDOE for review.</p>	<p>Director of Student Advocacy Parent/Teacher Coordinator Parent Liaisons</p>	<p>May 2017</p>

<p>FINDING 3: ESEA §1118(c)(1): Parental Involvement (Policy Involvement)</p>	<p>The district must ensure that its Title I schools annually convene their FY 2016-2017 annual Title I meetings for the parents/guardians of participating students no later than mid-October.</p>	<p>The district will convene annual parent/stakeholder meetings. Each school will provide evidence of their annual meetings. The district will submit invitational letter/flyer, agenda, meeting minutes, and sign-in sheets to the NJDOE for review.</p>	<p>Director of Student Advocacy Parent/Teacher Coordinator Parent Liaisons</p>	<p>May 2017</p>
<p>FINDING 4: ESEA §1120: Participation of Children Enrolled in Private Schools: Uniform Guidance 2 CFR 200.302, Financial management</p>	<p>The district must ensure that the contract for the vendor used to provide all Title I nonpublic services for FY 2016-2017 is comprehensive and stipulates all Title I services to be provided in accordance with the Title I statute and regulations.</p>	<p>The RFP for the non-public third party provider was revised to include professional development, parental involvement activities, and the specific criteria used to identify and exit students eligible for Title I services. A contract revision will be made to include details on the services to be provided by the vendor.</p>	<p>Director of Special Education Director of Planning/Research & Evaluation Assistant Business Administrator/Assistant Board Secretary</p>	<p>June 30-September 2016</p>
<p>FINDING 5: ESEA §1120: Participation of Children Enrolled in Private Schools: Uniform Guidance 2 CFR 200.302, Financial management</p>	<p>The district must ensure that the vendor used to provide all Title I nonpublic services for FY 2016-2017 provides supporting documentation such as teacher time reports signed by both the individual that provides the Title I nonpublic services and the district. All administrative costs incurred are according to the five percent cap and not upfront costs but as services rendered.</p>	<p>The district will require the vendor to have the teacher time reports signed by the principal, teacher and district monthly. All invoices will be reviewed for compliance prior to payment. Any noncompliance will be returned to the vendor for correction.</p>	<p>Director of Special Education Fiscal Specialist</p>	<p>June 30, 2017</p>
<p>FINDING 6: ESEA §1114(b): Schoolwide Programs (Components of a</p>	<p>The district must ensure that the Title I schoolwide schools Stakeholder Engagement Committee representation will include the following: community</p>	<p>The district will send the updated Stakeholder Engagement Committee pages for each of its Title I schoolwide</p>	<p>Director of Planning/Research & Evaluation Director of Student</p>	<p>September 30-June 30, 2017</p>

Schoolwide Program)	<p>member, parent representative not affiliated with the district's board of education and a non-instructional staff. In addition, plans will reflect at a minimum quarterly meetings.</p>	<p>programs with the referenced representatives to the NJDOE for review. The district will monitor all its schools to ensure that quarterly meetings are being held. Meetings, agendas and minutes will be gathered as supporting documentation.</p>	Advocacy	September 30, 2016
<p>FINDING 7: ESEA §1114: Schoolwide Programs (Components of a Schoolwide Program)</p>	<p>The district must ensure that its schools revisit the Schoolwide Plan planning processes so that the plans address the feedback given at the monitoring visit and the technical assistance from NJDOE personnel regarding specific plan deficiencies.</p>	<p>The district and the schools will revisit their plans to ensure that the plans address the feedback given at the monitoring visit. Directors and Supervisors will meet with the Principals and review the NJDOE recommendations/findings and correct all deficiencies.</p>	<p>The Assistant Superintendent of Schools Assistant Superintendent of Curriculum & Instruction Principals</p>	September 30, 2016
<p>FINDING 8: ESEA §1114: Schoolwide Programs: ESEA §1120</p>	<p>The district must ensure that it works with its respective Regional Achievement Center to reflect all school-level programs, salaries and activities, including the corresponding budget in the SIPs.</p>	<p>The Assistant Superintendent of Schools and the Assistant Superintendent of Curriculum and Instruction, the Business Administrator and the RAC team will review all SIP plans and budgets to ensure that all initiatives and budgeted costs are reflected in school-level allocations.</p>	<p>Assistant Superintendents School Business Administrator/Board Secretary RAC Team</p>	August 29, 2016-June 30, 2017
<p>FINDING 9: Uniform Guidance 2 CFR 200.430, Compensation- Personal Services</p>	<p>The district must ensure that it combines the information on the time activity reports and weekly calendar/plans so that it is in one document.</p>	<p>The district will revise its time activity reports and weekly calendar/plans so it will be one document. The district will submit sample timesheets for FY 2016-2017 to the NJDOE for review.</p>	<p>School Business Administrator/Board Secretary Director of Planning/Research & Evaluation</p>	September 13, 2016

<p>FINDING 10: ESEA §31.15(g) Subgrants to Eligible Entities Supplement, Not Supplant</p>	<p>The district's use of Title III funds for salaries of three English as Second Language teachers supplanted state and local funds.</p>	<p>The district amended its current year grant and the amendment was approved in the Electronic Web Enable Grant system to reflect funds in the amount of \$65,000 allocated to schoolwide-blended.</p>	<p>Director of Bilingual/ESL Education Fiscal Specialist</p>	<p>No further action required</p>
<p>FINDING 11: 34 CFR §300.321 through 300.324; and 34 CFR §300.138(b)(2)(ii)</p>	<p>The district must ensure to identify the proper funding source in students' Service Plans (ISP) where students are receiving services in nonpublic settings.</p>	<p>The district will conduct training for the agency with which the district has designated to provide the services and conduct on-site visits to ensure correction and compliance.</p>	<p>Director of Special Education</p>	<p>September 26 through February 2017</p>
<p>FINDING 12: N.J.A.C. 6A:14-3.3.(e)</p>	<p>The district must ensure that meetings are conducted within 20 calendar days of receipt of a written request for evaluation for students referred for special education and related services and students referred for speech-language services.</p>	<p>The district will conduct training for Speech-Language specialists and Child Study Team members regarding the NJ Code requirements on the 20 days compliance.</p> <p>The district will submit a copy of the documentation for students referred for special education and related services and students referred for speech-language services between November 2016 and February 2017 to the NJDOE.</p>	<p>Director of Special Education</p>	<p>November 2016 to February 2017</p>
<p>FINDING 13: N.J.A.C. 6A:14-3.7(e) 11</p>	<p>The district must ensure that transition planning is complete and documented for students age 16 or above at each IEP meeting.</p>	<p>The district will conduct training for Child Study Team members regarding the requirements for documenting transition planning for students age 16 and above.</p> <p>The district will ensure students' IEPs are annually updated with postsecondary</p>	<p>Director of Special Education Child Study Team Members</p>	<p>November 2016 through February 2017</p>

<p>FINDING 14: N.J.A.C. 6A:14-2.3(k)2x and 34 CFR §300.322.(a)(2)</p>	<p>The district must ensure that each student with an IEP at age 14 or above is provided with a written invitation to any IEP meeting where post-school transition is discussed.</p>	<p>measurable goal(s) and postsecondary goal(s) based on age appropriate transition assessment.</p> <p>The district will conduct annual review meetings and revise the IEPs for specific students with IEPs that were identified as non-compliant.</p>	<p>Division of Special Education</p> <p>Supervisors of Special Education and Instructional Chairs will conduct training for Child Study Team members to ensure correction and compliance.</p>	<p>September 2016 through February 2017</p>
<p>FINDING 15: 34 CFR §300.158-300.161</p>	<p>The district must revise its policies and procedures to ensure students with disabilities participate in district wide assessments and each IEP contains a statement of any individual modifications to be provided.</p>	<p>The district will conduct training for Child Study Team members regarding the requirements for providing students age 14 and above with written invitation to any IEP meeting where transition to adult life is discussed. The district will ensure compliance with Easy IEP.</p> <p>The district will revise its policies and procedures to include the provision of accommodations and modifications and the provision of alternate assessments for those students who cannot participate in the regular assessment.</p>	<p>Director of Special Education, Supervisors of Special Education and Instructional Chairs will monitor to ensure correction and compliance.</p>	<p>August 29, 2016</p>
<p>FINDING 16: Uniform Grant Guidance 2 C.F.R. 200.302; N.J.S.A. 18A:18A(2)(v) Public School Contracts Law</p>	<p>The district must ensure that purchase orders are issued to all vendors prior to goods or services being provided.</p>	<p>The district Business Office will monitor goods being purchased to ensure that a purchase order is issued prior to the purchase of goods or services. The Business Office will create procedures and training will be conducted for all staff involved</p>	<p>School Business Administrator/Board Secretary</p>	<p>June 30, 2017</p>

<p>Recommendation 1</p>	<p>The district must ensure that individual(s) familiar with Title I nonpublic requirements and Title I authority review and sign-off on Title I nonpublic service expenses.</p>	<p>in purchasing to ensure that orders are not being placed without a valid purchase order.</p> <p>The district will ensure that the Director of Testing (NCLB) sign-off on all Title I nonpublic service expenses.</p>	<p>Director of Planning/Research & Evaluation Director of Special Education</p>	
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Chief School Administrator

9/27/2016
Date


Board Secretary/Business Administrator

Date