



State of New Jersey  
DEPARTMENT OF EDUCATION  
PO Box 500  
TRENTON, NJ 08625-0500

CHRIS CHRISTIE  
Governor

KIM GUADAGNO  
Lt. Governor

DAVID C. HESPE  
Commissioner

February 4, 2015

Dr. Robert Previti, Superintendent  
Mainland Regional High School District  
1301 Oak Avenue  
Linwood, NJ 08221

Dear Dr. Previti:

The New Jersey Department of Education has completed a review of funds received and disbursed from one or more federal programs by the **Mainland Regional Board of Education**. The funding sources reviewed include titled programs for the Elementary and Secondary Education Act (ESEA) and the Individuals with Disabilities Education Act (IDEA). The review covered the period July 1, 2013 through December 9, 2014. The resulting report is enclosed. Please provide a copy of the report to each board member. All issued Consolidated Monitoring Reports will be posted on the department's website at <http://www.state.nj.us/education/finance/jobs/monitor/consolidated>.

Utilizing the process outlined in the attached "Procedures for LEA/Agency Response, Corrective Action Plan and Appeal Process," the Mainland Regional Board of Education is required, pursuant to N.J.A.C. 6A:23A-5.6, to publicly review and discuss the findings in this report at a public board meeting no later than 30 days after receipt of the report. Within 30 days of the public meeting, the board must adopt a resolution certifying that the findings were discussed in a public meeting and approving a corrective action plan which addresses the issues raised in the undisputed findings and/or an appeal of any **monetary** findings in dispute (emphasis added). A copy of the resolution and the approved corrective action plan and/or appeal must be sent to this office within 10 days of adoption by the board. Direct your response to my attention.

Also, pursuant to N.J.A.C. 6A:23A-5.6(c), you must post the findings of the report and the board's corrective action plan on your district's website.

By copy of this report, your auditor is requested to comment on all areas of noncompliance and recommendations in the next certified audit submitted to the New Jersey Department of Education. If you have any questions, please contact Frank Basso at (609) 984-5909.

Sincerely,

Robert J. Cicchino, Director  
Office of Fiscal Accountability and Compliance

RJC/FB/dk: Mainland Regional BOE Cover Letter /consolidated monitoring  
Enclosures

Distribution List

David C. Hesse  
Robert Bumpus  
Susan Martz  
Michael Yapple  
Karen Campbell  
Peggy McDonald  
Kimberly Murray  
Frank Basso  
Thomas McMahon  
Stephen M. Eells

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

**MAINLAND REGIONAL HIGH SCHOOL DISTRICT**  
1301 OAK AVENUE  
LINWOOD, NJ 08221  
PHONE: (609) 927-4151



*New Jersey K-12 Education*

**CONSOLIDATED MONITORING REPORT  
FEBRUARY 2015**

**District:** Mainland Regional High School District  
**County:** Atlantic  
**Dates On-Site:** December 9, 2014  
**Case #:** CM-001-14

**FUNDING SOURCES**

Program	Funding Award
Title I, Part A	\$ 186,058
Title II, Part A	25, 572
Title III, Part A	2,815
IDEA Preschool	2,170
IDEA Basic	11,511
Total Funds	<u>\$ 228,126</u>

**MAINLAND REGIONAL HIGH SCHOOL DISTRICT  
CONSOLIDATED MONITORING REPORT  
FEBRUARY 2015**

**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 Mainland Regional High 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); and IDEA Basic and Preschool for the period July 1, 2013 through December 9, 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 from July 1, 2013 through December 9, 2014. A sampling of purchase orders and/or salaries was taken from each program reviewed.

**MAINLAND REGIONAL HIGH SCHOOL DISTRICT  
CONSOLIDATED MONITORING REPORT  
FEBRUARY 2015**

**GENERAL OVERVIEW OF USES OF TITLE I, TITLE II, TITLE III AND IDEA**

**Title I Projects**

The district is using its FY 2014-2015 Title I funds to implement targeted assistance programs in its high school. Primarily, the district provides tutoring services through assigning students to a remedial support class for additional learning time. Title I funds in previous project periods were spent on similar programs.

**Title II Projects**

The district is using its FY 2014-2015 Title II funds for staff professional development and for stipends for instructional coaches.

**Title III Projects**

The district participates in a consortium with Northfield School District. The district uses Title III funds to purchase instructional supplies.

**IDEA Projects (Special Education)**

The district is using its FY 2015 IDEA funds to reduce district tuition expenditures for students receiving special educational services in private schools for students with disabilities.

**DETAILED FINDINGS AND RECOMMENDATIONS**

**Title I**

**Finding 1:** The district did not consistently apply the established entrance and exit criteria for Title I eligibility. The monitors were unable to verify the process used to select and serve Title I students.

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

**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 school 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.

**MAINLAND REGIONAL HIGH SCHOOL DISTRICT  
CONSOLIDATED MONITORING REPORT  
FEBRUARY 2015**

**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 submit a copy of the 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. The meeting was held the night before the monitoring visit and was attended by only four district staff. 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 reconvene the FY 2014-2015 annual Title I meeting for the parents/guardians of its identified Title I students in the beginning of 2015. The district must submit evidence of convening this meeting (e.g., invitational letter/flyer, agenda, meeting minutes, and sign in sheets) to the NJDOE for review.

**Finding 4:** There was no evidence that 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 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's Title I school-parent-student compact did not include the role of the student. The school-parent compact is a mechanism to inform parents/guardians of the roles and responsibility of the school, parents/guardians, and students in achieving academic success. The exclusion of students or parents in the development of these documents does not offer them the opportunity for full participation in the student's educational program.

**Citation:** ESEA §1118(d): *Parental Involvement (Shared Responsibilities for High Student Academic Achievement)*.

**MAINLAND REGIONAL HIGH SCHOOL DISTRICT  
CONSOLIDATED MONITORING REPORT  
FEBRUARY 2015**

**Required Action:** For FY 2014-2015, the district must develop and distribute its Title I school-parent compact to participating students and their parents/guardians no later than February 2015. The compact must reflect the legislative requirements by including how the school, parent, and students will share in the responsibility for improved student academic achievement. The district must provide a copy of the distributed school-parent compact, along with a description of the mechanism to distribute it, to the NJDOE for review.

**Finding 6:** The district failed to provide evidence of when the district's Title I written parental involvement policy was distributed to the parents/guardians of students participating in the Title I program for the 2014-2015 school year. In accordance with legislative requirements, parents/guardians of Title I students have a right to be involved in the development of the written parental involvement policy, as well as be informed of ways they can further engage themselves in the academic performance and achievement of their children.

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

**Required Action:** For the 2014-2015 school year, the district must ensure that it distributes the written parental involvement policy to parents/guardians of the Title I students and submit the letter and documentation of distribution to the NJDOE for review.

**Finding 7:** The district did not consult with any nonpublic schools outside of its boundaries. On the FY 2014-2015 ESEA-NCLB Consolidated Application in Step One of the Title I, Part A eligibility tab, the district entered projected enrollment numbers based on articulation meetings with sending districts. As a result, the district did not offer services to potentially eligible students.

**Citation:** ESEA §1120 *Participation of Children Enrolled In Private School*.

**Required Action:** For FY 2014-2015, the district must send letters to all nonpublic schools that enroll resident children. This includes nonpublic schools within the district boundaries and neighboring districts. The district must submit documentation of its consultation efforts to the NJDOE for review. Information on equitable participation of nonpublic students for Title I can be found on the NJDOE website at: <http://www.state.nj.us/education/title1/leg/policy/equitable.shtml>.

**Administrative**

**Finding 8:** The district failed to submit a timely TPAF/FICA reimbursement report for FY 2013-2014. The report, due October 1, 2014 was filed on or about November 25, 2014. The liquidation of \$23,825 was paid after the state imposed 45 day liquidation period and is not allowed to be charged to the FY 2013-2014 final report.

**MAINLAND REGIONAL HIGH SCHOOL DISTRICT  
CONSOLIDATED MONITORING REPORT  
FEBRUARY 2015**

**Citation:** N.J.S.A. 18A:66-90, *Reimbursement of TPAF/FICA*; EDGAR, PART 80--*Uniform Administrative Requirements for Grants and Cooperative Agreements to State and Local Governments*, Section 23, Period of Availability of Funds.

**Required Action:** The late payment of FY 2013-2014 encumbered amounts is being referred to the Office of Fiscal Accountability and Compliance for follow up.

**Finding 9:** The district is not posting expenses to the grants as incurred, and is not drawing down funds through Electronic Web Enabled Grant or the System for Administering Grants Electronically systems as expenses are incurred. The district has consistently waited until the end of the grant period to draw down funds, which is not an acceptable standard for financial management.

**Citation:** EDGAR, PART 80--*Uniform Administrative Requirements for Grants and Cooperative Agreements to State and Local Governments*, Section 20, Standards for financial management systems.

**Required Action:** The district must develop and approve a formal board policy concerning the reimbursement of grant funds. The district must submit a copy of this written policy to the NJDOE for review.

**Title II**

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

**Title III**

A review of the Title III program yielded no findings.

**IDEA (Special Education)**

A review of the IDEA programs and fiscal expenditures yielded no findings.

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](mailto:frank.basso@doe.state.nj.us) .