



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

May 22, 2015

Mr. Paul Saxton, Superintendent
Fort Lee School District
2175 Lemoine Avenue, 6th Floor
Fort Lee, NJ 07024

Dear Mr. Saxton:

The New Jersey Department of Education has completed a review of funds received and disbursed from one or more federal programs by the **Fort Lee 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 November 30, 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 Fort Lee 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 Steven Hoffmann at (973) 621-2750.

Sincerely,

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

RJC/SH/dk:Fort Lee BOE CM Cover Letter
Enclosures

Distribution List

David C. Hesper
Robert Bumpus
Susan Martz
Michael Yapple
Karen Campbell
Lisa McCormick
Peggy McDonald
Kimberly Murray
Steven Hoffmann
Norah Peck
Stephen M. Eells

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

FORT LEE BOARD OF EDUCATION
2175 LEMOINE AVENUE
FORT LEE, NJ 07024
PHONE: (201) 585-4612



New Jersey K-12 Education

**CONSOLIDATED MONITORING REPORT
MAY 2015**

District: Fort Lee Public Schools
County: Bergen
Dates On-Site: December 2, 3 and 4, 2014
Case #: CM-004-14

FUNDING SOURCES

Program	Funding Award
Title I, Part A	\$ 563,541
IDEA Basic	902,973
IDEA Preschool	21,045
Title II, Part A	143,107
Title III	96,680
Title III Immigrant	114,723
Total Funds	<hr/> <hr/> \$ 1,842,069

**FORT LEE PUBLIC SCHOOLS
CONSOLIDATED MONITORING REPORT
MAY 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 and IDEA). 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 Fort Lee 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; Title III Immigrant; and IDEA Basic and Preschool for the period July 1, 2013 through November 30, 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 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, Title III Immigrant and IDEA Basic and Preschool from July 1, 2013 through November 30, 2014. A sampling of purchase orders and/or salaries was taken from each program reviewed.

**FORT LEE PUBLIC SCHOOLS
CONSOLIDATED MONITORING REPORT
MAY 2015**

GENERAL DISTRICT OVERVIEW OF USES OF TITLE I AND IDEA FUNDS

Title I Projects

Title I funds were used to support basic skills teacher salaries, instructional supplies and professional and technical services.

IDEA Projects

The majority of IDEA funds were used to reduce district tuition costs for students receiving special educational services in approved private schools for students with disabilities. Coordinated Early Intervening Services directed funds were used to fund after school tutoring for students at risk.

DETAILED FINDINGS AND RECOMMENDATIONS

Title I

Finding 1: On the Title I Eligibility - Step 1 of the FY 2014-2015 ESEA-NCLB Consolidated Application, the district did not identify students experiencing homelessness. As such, the district did not reserve funds for homeless students (\$250 per student) attending non-served Title I schools to provide services comparable to those services provided to children in Title I funded schools.

Citation: ESEA § 1113(c)(3): *Eligible School Attendance Areas (Allocations).*

Required Action: The district must amend the Title I Eligibility - Step 1 of the FY 2014-2015 ESEA-NCLB Consolidated Application to accurately depict students experiencing homelessness. The district must reserve funds and provide Title I services that meet the unique needs of students experiencing homelessness.

Finding 2: The district did not provide sufficient evidence to ascertain whether a Title I paid teacher (M.S.) meets the highly qualified teacher (HQT) requirements. The evidence provided for that staff member, who tutors 7-8th grade students, was a Teacher of the Handicapped certification.

Citation: ESEA §1119: *Qualifications for Teachers and Paraprofessionals.*

Required Action: The district must submit evidence that the teacher either meets the HQ requirements for tutoring 7-8th grade students or not allow the teacher to serve in this capacity until the HQT requirements are met.

Finding 3:The Title I participation letter(s) informing parents of the Title I eligible students about the Title I program did not have clearly defined program entrance and exit criteria. Without this information, parents are unable to understand the reasons for their child

**FORT LEE PUBLIC SCHOOLS
CONSOLIDATED MONITORING REPORT
MAY 2015**

being selected to participate in the Title I program, and what is needed for their child to exit the program.

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

Required Action: The district's Title I schools must revise their Title I participation letter(s) to include clearly defined entrance and exit criteria used for Title I student identification and what is required to exit the program. The district must provide a copy of each school's revised FY 2014-2015 Title I participation letter to the NJDOE for review.

Finding 4: For the two full-time teachers whose salary is supported with Title I funds, the district did not have the required supporting documents to verify the time and activity as required by federal law. The documentation must reflect what the staff is doing, when and where plus it must match their funded percentage and be signed by the staff member and supervisor.

Citation: OMB Circular A-87, Attachment B, Section 8(h): *Cost Principles for State, Local and Indian Tribal Governments (Compensation for personal services)*.

Required Action: The district must verify the time and activity of staff charged to the grant to reflect the actual time allotted to Title I activities with staff and supervisor signatures. The district must submit a list of FY 2014-2015 Title I funded staff, salaries, funding percentages and appropriate time sheets to the NJDOE for review.

Finding 5: The district did not have a parental involvement program that reflected the requirements of Title I. There is no evidence the district's Title I parental involvement policy was reviewed and board adopted since August 23, 2010, and no evidence of current Title I school-level parental involvement policies. 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 parents of Title I students. For FY 2014-2015, Title I parents and associated stakeholders must be included in the development processes.

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

Required Action: The district must have a written district parental involvement policy evaluated annually with current board adoption along with current school-level parental involvement policies. Copies of a recent board approved district parental involvement policy must be submitted to the NJDOE for review. Evidence of parental input into the development of the Title I parental involvement policies must be documented with meeting agendas, sign in sheets and minutes.

**FORT LEE PUBLIC SCHOOLS
CONSOLIDATED MONITORING REPORT
MAY 2015**

Finding 6: For FY 2014-2015, the district provided evidence of school-parent-student compacts, but did not provide evidence that the school-parent-student compacts were developed in conjunction with Title I parents. The absence of parent participation in developing these

required documents excludes parents from more active participation in their child's educational program. In addition, the school-parent-student compacts provided required student signatures, but did not indicate the student's role in his or her educational program.

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

Required Action: The district must develop school-parent-student compacts that include the student's role and include the associated stakeholder groups in the development process for 2015-2016. The district must provide evidence of school-parent-student compacts with the student's role to the NJDOE for review for FY 2014-2015. For FY 2015-2016, the district must include and document that Title I parents were involved in the development process.

Finding 7: For FY 2014-2015, the district provided insufficient evidence of convening an annual Title I parent meeting at School Number 2 and at Lewis F. Cole Middle School that met the legislative requirements. Not conducting an annual meeting at the beginning of the year to explain the Title I legislation and the district's Title I programs at each school did not allow parents of identified Title I students to be informed and vested in the Title I process from the start.

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

Required Action: The district must convene and sufficiently document its FY 2015-2016 annual Title I school meetings for the parents/guardians of its identified Title I students no later than mid-October. The district must submit evidence of the meetings (e.g., invitational letter/flyer, agenda, meeting minutes, and sign in sheets) to the NJDOE for review.

Finding 8: The Title I Parental Involvement Reserve of \$18,969 indicated on Title I Eligibility - Step 4 of the district's FY 2014-2015 ESEA-NCLB Consolidated Application was not itemized at the school-level on the Parent Involvement – School Allocations tab. Not including the school-level amount(s) did not allow for verification that 95 percent of the district reserve is budgeted and expended at the school-level.

Citation: ESEA §1112: *Local Educational Agency Plans*; ESEA §1118(a)(3): *Parental Involvement (Local Educational Agency Policy)*.

Required Action: The district must include the amount(s) budgeted for school-level Title I parental involvement activities on the Parent Involvement – School Allocations tab

**FORT LEE PUBLIC SCHOOLS
CONSOLIDATED MONITORING REPORT
MAY 2015**

in the ESEA-NCLB Consolidated Application to accurately reflect 95 percent of the Parental Involvement Reserve on Title I Eligibility - Step 4.

Finding 9:

The district did not conduct outreach to nonpublic schools outside the attendance area that enroll Fort Lee resident students despite transportation reports that indicate the district is paying to transport students attending nonpublic schools outside the attendance area. Therefore, on the FY 2014-2015 ESEA-NCLB Consolidated Application in Step One of the Title I, Part A Eligibility tab, the district included nonpublic enrollment counts and zero low-income counts for only the one nonpublic school within the attendance area. As a result, the district's application did not generate funds for equitable services to resident students that attend nonpublic schools outside the district's attendance area.

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

Required Action: The district must contact the nonpublic schools outside the attendance area that enroll resident students to generate accurate enrollment and low-income nonpublic student data using the Nonpublic School Survey. The district must amend its FY 2014-2015 ESEA-NCLB Consolidated Application to include the nonpublic enrollment and nonpublic low-income counts for outside the attendance area. In addition, the district must reach out to those nonpublic schools and begin the consultation process to identify eligible Title I students and develop a service delivery plan. The district must send documentation of the consultation process (e.g., invitational letters, agendas, meeting notes, sign in sheets) to the NJDOE for review.

Finding 10: For FY 2013-2014, the costs associated with Title I parental involvement activities for John Parra (Puente's) book signing including fees (\$550), books (\$448.75), and food (\$117) were not necessary and reasonable for proper and efficient performance and administration of the district's Title I program. As a result, these expenditures are unallowable.

Citation: ESEA §1118: *Parental Involvement*; OMB Circular A-87, Attachment B, Section 14: *Cost Principles for State, Local and Indian Tribal Governments (Entertainment costs).*

Required Action: The district must allocate state/local funds rather than using Title I funds to support these expenditures. The district must provide evidence of the adjusting accounting entry for the expenditures to the NJDOE for review.

Finding 11: At School Number 2, Title I students that participate in the Reading Recovery Program missed part of the designated class time for other content areas. At Lewis F. Cole Middle School, Title I students missed time from unified arts classes (i.e. technology, music, arts).

**FORT LEE PUBLIC SCHOOLS
CONSOLIDATED MONITORING REPORT
MAY 2015**

Citation: ESEA §1115(c): *Targeted Assistance Schools (Components of a Targeted Assistance School Program)*.

Recommended Action: The district should revisit the Title I programs at School Number 2 and Lewis F. Cole Middle School to limit or eliminate missed class time that Title I students experience.

Title II

Finding 12: A review of professional development activities funded by Title II revealed that the district misclassified FY 2013-2014 (Purchase Order 1213-2653 for \$1,909.00) and FY 2014-2015 (Purchase Order 1314-2461 for \$5,342.00) expenditures that showed unallowable costs charged to the Title II program for the nonpublic school. The unallowable costs were three SMART boards and general supplies. Classroom expenses for material and general supplies that are for student use are not allowable. Supplemental materials and supplies related to professional development for teacher, principal, paraprofessional are allowable expenditures.

Citation: ESEA §1112, §1119, and §2122-§2123: 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 reverse and reclassify the expenditures for SMART Boards and general supplies, and ensure these expenditures are appropriately classified. The district must provide evidence of the adjusting journal entries to the NJDOE for review.

Title III

Finding 13: The district used Title III funds to purchase five \$50.00 iTunes gift cards (purchase order 1314-2169) for the intended purpose of staff at the nonpublic school to purchase applications for the instruction of English Language Learner (ELL) students through iTunes. However, the district was unable to provide support for how four of the five gift cards were expended.

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 implement an internal controls system to provide oversight of gift cards purchased with federal funds. The district's system must have a mechanism to identify and track purchases made with gift cards. The district must reverse the current year expenditures of iTunes gift cards and submit evidence of the adjusting journal entries to NJDOE for review.

FORT LEE PUBLIC SCHOOLS
CONSOLIDATED MONITORING REPORT
MAY 2015

Finding 14: During the consolidated monitoring, district officials acknowledged for FY 2013-2014 and FY 2014-2015 limited verbal, ongoing communication with nonpublic school officials. Following the consolidated monitoring, district officials provided evidence of FY 2014-2015 signed Affirmation of Consultation with nonpublic school officials. However, documents provided (i.e. copies of emails) did not specifically reveal timely, ongoing, and meaningful consultation between the district and nonpublic school officials on the progress and evaluation of services provided to eligible nonpublic school students, teachers, and other educational personnel who participated in programs grants funded under Title III and Title III Immigrant. Affirmation of Consultation stipulates that consultation must continue throughout the implementation and assessment of services of activities under Title III and Title III Immigrant.

Citation: ESEA §9501: *Participation by Private School Children and Teachers.*

Required Action: In order to ensure timely, ongoing, and meaningful nonpublic school consultation, the district must institute steps to enhance its record keeping of ongoing contact with nonpublic school officials. The district must submit current FY 2014-2015 documentation to verify that consultation was timely, ongoing and meaningful that covered all appropriate topics throughout the implementation and assessment of activities that had a reasonable expectation of success under Title III and Title III Immigrant to the NJDOE for review.

Title III Immigrant

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

IDEA (Special Education)

Finding 15: In both FY 2013-2014 and FY 2014-2015, the district did not properly apply their entrance criteria for providing coordinated early intervening services (CEIS) to students at risk. Students that did not meet the district's eligibility criteria were provided services and students eligible for special education and related services were provided with CEIS services. In addition, the district did not track students who were provided with CEIS services.

Citation: 20 U.S.C. §1413(f); and 34 CFR §300.226(d).

Required Action: The district must determine eligibility criteria for CEIS and that prior to providing services, ensure students meet the eligibility criteria. In addition, the district must ensure that all students that receive CEIS are counted and subsequently tracked for two years.

IDEA Program

Finding 16: The district did not consistently provide notice of a meeting to parents of students referred and/or eligible for special education and related services and for students referred and/or eligible for speech-language services.

**FORT LEE PUBLIC SCHOOLS
CONSOLIDATED MONITORING REPORT
MAY 2015**

Citation: N.J.A.C. 6A:14-2.3(k)3 and 5; 20 U.S.C. §1414(b)(1); and 34 CFR §300.304(a).

Required Action: The district must provide parents notice of a meeting in writing that contains all required components, early enough to ensure they have an opportunity to attend. 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 copies of notice provided for meetings conducted between September 2015 and December 2015, and to review the oversight procedures.

Finding 17: The district did not consistently convene meetings with required participants for students referred and/or eligible for special education and related services and for students referred and/or eligible for speech-language services.

Citation: N.J.A.C. 6A:14-2.3(k)1-2; 3.3(e); 20 U.S.C. §1414(d)(1)(B); and 34 CFR §300.321(a).

Required Action: The district must ensure meetings are conducted with required participants and documentation of participation is maintained in students' records. 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 meeting documentation, including the sign in sheets, for meetings conducted between September 2015 and December 2015, and to review the oversight procedures.

Finding 18: The district did not consistently provide written notice of a meeting to parents of students referred and/or eligible for special education and related services and for students referred and/or eligible for speech-language services.

Citation: N.J.A.C. 6A:14-2.3(f-i); 20 U.S.C. §1414(b)(1); and 34 CFR §300.304(a).

Required Action: The district must ensure that parents are provided written notice of a meeting that contains all required components within 15 calendar days of the meeting. 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 copies of written notice provided to parents following meetings conducted between September 2015 and December 2015, and to review the oversight procedures.

Finding 19: 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.

**FORT LEE PUBLIC SCHOOLS
CONSOLIDATED MONITORING REPORT
MAY 2015**

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

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 documentation from identification meetings conducted between September 2015 and December 2015, and to review the oversight procedures.

Finding 20: The district did not conduct annual review meetings within one year of the prior IEP for students eligible for special education and related services and for students eligible for speech-language services.

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

Required Action: The district must ensure an IEP meeting is conducted annually. 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 annual review dates of IEPs developed at meetings conducted between September 2015 and December 2015, and to review the oversight procedures.

Finding 21: The district did not consistently conduct all required sections of the functional assessment as a component of initial evaluations for students referred for special education and related services and for students referred for speech-language services.

Citation: N.J.A.C. 6A:14-3.4(f)4(i and iii); 20 U.S.C. §1414(b)(4) and (5); and 34 CFR §300.306(c)(i).

Required Action: The district must ensure all components of the functional assessment are conducted as part of all initial evaluations. 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 initial evaluation reports for students evaluated between September 2015 and December 2015, and to review the oversight procedures.

Finding 22: The district did not consistently conduct multidisciplinary initial evaluations for students referred for special education and related services by having a minimum of two child study team members conduct assessments.

**FORT LEE PUBLIC SCHOOLS
CONSOLIDATED MONITORING REPORT
MAY 2015**

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

Required Action: The district must ensure a multidisciplinary evaluation is conducted for students referred for special education and related services by obtaining assessments from a minimum of two members of the child study team. 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. A monitor from the NJDOE will conduct an on-site visit to review initial evaluation reports for students referred for special education and related services whose eligibility meetings were held between September 2015 and December 2015, and to review the oversight procedures.

Finding 23: 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:

- an explanation of why the supplementary aids and services were rejected;
- the potentially beneficial or harmful effects which a placement in general education may have on the students with disabilities or 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,(ii) and (iii) and 3.7(k).

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 that all required decisions regarding the 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 that for students placed in separate settings, the IEP team identifies 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 regarding the district's procedures 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 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 additional IEPs developed at meetings conducted between September 2015 and December 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 24: The district did not consistently ensure that students were found eligible for special education and related services or speech-language services in accordance with the criteria set

**FORT LEE PUBLIC SCHOOLS
CONSOLIDATED MONITORING REPORT
MAY 2015**

forth for each disability category found in N.J.A.C. 6A:14. Specifically, the district did not document in either the initial IEP or in eligibility documentation, the criteria used to determine eligibility for the categories of preschool disabled, specific learning disability, or speech-language services.

Citation: N.J.A.C. 6A:14-3.5(a-c) and 3.6(a-c).

Required Action: The district must ensure students found eligible for special education and related services and speech-language services meet the criteria for one or more of the disability categories as defined in N.J.A.C. 6A:14-3.5(c) and 3.6(a-b) and that the criteria used to determine eligibility is maintained in the initial IEP or eligibility documentation. 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 documentation of eligibility from meetings conducted between September 2015 and December 2015, and to review the oversight procedures.

Finding 25: The district did not consistently document in the IEPs of students eligible for special education and related services the description of extended school year (ESY), when it was determined that an ESY was warranted.

Citation: N.J.A.C. 6A:14-4.3(c).

Required Action: The district must ensure when an ESY is warranted, a description of the program is included 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. A monitor from the NJDOE will conduct an on-site visit to interview staff, review IEPs developed at meetings conducted between September 2015 and December 2015, and to review the oversight procedures.

Finding 26: The district did not consistently include required considerations and statements in each IEP for students eligible for special education and related services and for students eligible for speech-language services. Specifically, IEPs did not contain:

- most recent evaluations;
- accommodations and modifications for district wide assessments;
- frequency, duration, and location of related services; and
- a statement of how progress towards annual goals will be measured.

Citation: N.J.A.C. 6A:14-3.7(c)3,(e)3,7&8 and 4.3(c); and 20 U.S.C. §1414(d)(3)(A)(B); and 34 CFR §300.324(a)(1)(2).

**FORT LEE PUBLIC SCHOOLS
CONSOLIDATED MONITORING REPORT
MAY 2015**

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. To demonstrate the district has corrected the individual instances of noncompliance, the district must conduct annual review meetings and revise IEPs for 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 along with a random sample of IEPs developed between September 2015 and December 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 27: The district did not consistently provide to students eligible for special education and related services written notice of graduation and the summary of academic achievement and functional performance prior to graduating or exiting.

Citation: N.J.A.C. 6A:14-4.11(b)1.4; and 20 U.S.C. §1414(c)(5)(B); and 34 CFR §300.305(e)(3).

Required Action: The district must ensure written notice of graduation and a summary of academic achievement and functional performance is provided to parents or adult students prior to graduating or exiting. 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. A monitor from the NJDOE will conduct an on-site visit to interview staff, review copies of written notice of graduation and the summary of academic achievement and functional performance provided to students graduating or exiting at the conclusion of the school year, and to review the oversight procedures.

Finding 28: The district did not consistently document required transition components in the IEPs of students eligible for special education and related services ages 16 or above. IEPs did not consistently include evidence of the following:

- measurable postsecondary goal(s) were based on age appropriate transition assessments;
- postsecondary goals are updated annually;
- postsecondary goals were based on age appropriate transition assessments;
- transition services in the IEP that will reasonably enable the student to meet his or her postsecondary goal;
- courses of study;
- annual review goal related to the student's transition service needs; and
- a representative of any participating agency was invited to the IEP team meeting with the prior consent of the parent or student.

**FORT LEE PUBLIC SCHOOLS
CONSOLIDATED MONITORING REPORT
MAY 2015**

Citation: N.J.A.C. 6A:14-3.7(e)12.

Required Action: The district must ensure the IEPs for students age 16 or above include all required components. 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 that the district has corrected the individual instances of noncompliance, the district must conduct annual review meetings and revise IEPs for 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 along with a sample of IEPs of students age 16 and over developed at meetings conducted between September 2015 and December 2015, and to review the oversight procedures.

Administrative

Finding 29: 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: EDGAR, PART 80-Uniform Administrative Requirements for Grants and Cooperative Agreements to State and Local Governments, Section 20, Standards for financial management systems. 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.

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.