



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

CHRIS CHRISTIE
Governor

KIM GUADAGNO
Lt. Governor

DAVID C. HESPE
Commissioner

July 17, 2015

Dr. Christopher Heilig, Superintendent
Rancocas Valley Regional High School District
520 Jacksonville Road
Mount Holly, NJ 08060

Dear Dr. Heilig:

The New Jersey Department of Education has completed a review of funds received and disbursed from one or more federal programs by the **Rancocas Valley 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 May 4, 2015. 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 Rancocas Valley 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:Rancocas Valley Regional BOE CM Cover Letter 14-15
Enclosures

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RANCOCAS VALLEY REGIONAL HIGH SCHOOL DISTRICT
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New Jersey K-12 Education

**CONSOLIDATED MONITORING REPORT
JULY 2015**

District: Rancocas Valley Regional High School District
County: Burlington
Dates On-Site: May 4 and 5, 2015
Case #: CM-008-14

FUNDING SOURCES

	Program	Funding Award
Title I, Part A		\$ 122,491
Title II, Part A		36,516
IDEA Basic		470,812
	Total Funds	<u>\$ 629,819</u>

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BACKGROUND

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

INTRODUCTION

The NJDOE visited the Rancocas Valley 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); and IDEA Basic for the period July 1, 2013 through May 4, 2015.

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, and IDEA Basic from July 1, 2013 through May 4, 2015. A sampling of purchase orders and/or salaries was taken from each program reviewed.

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GENERAL OVERVIEW OF USES OF TITLE I, TITLE II AND IDEA FUNDS

Title I Projects

The district is using its FY 2014-2015 Title I funds for an High School Proficiency Assessment (HSPA) prep class for seniors that failed the exam in their junior year and an afterschool tutoring program that runs November through June.

Title II Projects

The district is using its FY 2014-2015 Title II funds for stipends for teacher professional development. Professional development is concentrated on the use of the co-teaching model.

IDEA Projects (Special Education)

The FY 2014-2015 IDEA Basic funds were used to reduce tuition costs for students receiving special education services in approved private schools for students with disabilities.

DETAILED FINDINGS AND RECOMMENDATIONS

Title I

Finding 1: The district did not provide evidence that multiple measures were applied to determine which students were eligible to receive Title I services.

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

Required Action: The district must establish multiple measures and a tracking mechanism for proper Title I student identification. This mechanism must include documentation of which criteria were applied and how the student either met or did not meet the criteria. The district must provide documentation of its multiple measures for Title I eligibility to the NJDOE for review.

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 opt-out of Title I services. This information is necessary for parents to understand the reasons their child was selected to participate in the Title I program, and what is needed for their child to exit the program.

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

Required Action: The district must revise its Title I participation letter to include the multiple, educationally related, objective criteria used to identify students for Title I

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services, and the criteria used to exit students from the Title I program. The district must provide a copy of its revised FY 2015-2016 Title I participation letter to the NJDOE for review.

Finding 3: The district did not provide evidence of convening the annual Title I parent meeting as required by the legislation. Not conducting an annual meeting to explain the Title I legislation and the district's Title I programs in the beginning of the year 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 Actions: The district must convene its FY 2015-2016 annual Title I meeting for the parents/guardians of its identified Title I students in the beginning of the year and submit evidence of the meeting (e.g., invitational letter/flyer, agenda, meeting minutes, 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 did not offer them the opportunity for full participation in their child's educational program.

Citation: ESEA §1118(c)(1) and (2): *Parental Involvement (Policy 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 developing these documents with the input of parents/guardians of the Title I students for the 2015-2016 school year.

Finding 5: The district's use of Title I funds for coaches to assist all staff with assessment, classroom instruction and differentiated instruction supplanted state/local funds.

Citation: OMB Circular A-87, Attachment B, Section 8(h): *Cost Principles for State, Local and Indian Tribal Governments*. ESEA §1120A(b): *Fiscal Requirements (Federal Funds to Supplement, Not Supplant, Non-Federal Funds)*.

Required Action: The district must reverse the Title I expenditures for the coaches and allocate state/local funds for these costs or Title II funds. The district must provide evidence of the journal entry to reverse the expenditures to the NJDOE for review. Additionally, the FY 2015 Title I Final Expenditure Report must reflect this reversal.

Finding 6: The district did not consult with nonpublic schools outside of its boundaries that enroll resident students. 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

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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 2015-2016, the district must send letters to all nonpublic schools that enroll resident children. This includes nonpublic schools within and outside the district's boundaries. 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>.

Finding 7: The district failed to submit a timely TPAF/FICA reimbursement report for FY 2013-2014. The report was due October 1, 2014 and was filed on or about October 15, 2014. The liquidation of \$14,735 was paid after the state imposed 45 day liquidation period and is not allowed to be charged to the FY 2013-2014 final report.

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 district must amend the FY 2013-2014 Final Report to reflect the \$14,735 TPAF/FICA reimbursement. The district should also review the report to determine if other unallowable costs were included in the report.

Finding 8: There was no evidence that the Parents' Right-to-Know Highly Qualified Teacher (HQT) letter was distributed and posted on the district's website.

Citation: ESEA §1111(h)(6): State Plans: Reports (Parents' Right-to-Know).

Required Action: The district must develop, distribute and post on its web site the HQT letter. A template of the HQT letter can be found at: <http://www.state.nj.us/education/title1/hqs/rtk.shtml>. The district must send a copy of the updated FY 2015-2016 HQT letter to the NJDOE for review.

Title II

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

IDEA (Special Education)

Finding 9: The district did not consistently provide parents of students eligible for special education and related services and students eligible for speech-language services notice of a meeting for reevaluation planning and determination of continued eligibility meetings.

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

Required Action: The district must ensure that parents are provided notice of a meeting in writing, that contains all required components, early enough to ensure that the parent has an opportunity to attend. In order to demonstrate correction of noncompliance, the district must conduct training for speech-language specialists and develop an oversight mechanism to ensure compliance with the requirements in the citations listed above. A monitor from the NJDOE will conduct an on-site visit to interview staff, review copies of notices of meetings conducted between September 2015 and January 2016, and to review the oversight procedures.

Finding 10: The district did not consistently provide parents written notice that contains all required components, within 15 calendar days following meetings for students eligible for special education and related services and students eligible for speech-language services.

Citation: 20 U.S.C. §1414(b); 34 CFR §300.503(a-c); 34 CFR §300.504; and N.J.A.C. 6A:14-2.3(f) and 2.3(g).

Required Action: The district must ensure that parents are provided written notice following a meeting that contains all required components within 15 calendar days of the meeting. In order to demonstrate correction of noncompliance, the district must provide 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. 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 January 2016, and to review the oversight procedures.

Finding 11: The district did not consistently conduct annual IEP meetings within one year of the previous annual review date for students eligible for special education and related services.

Citation: N.J.A.C. 6A:14-3.7(j); 20 U.S.C. §1414(d); and 34 CFR §300.324(b)(1).

Required Action: The district must ensure that IEP team meetings are conducted annually or more often if necessary to review, revise and determine the programs and placement of each classified student. 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 IEPs developed at meetings held between September 2015 and January 2016 and to review the oversight procedures.

Finding 12: The district did not consistently ensure that the required participants were in attendance at meetings to determine continued eligibility for student eligible for speech-language services.

Citation: N.J.A.C. 6A:14-2.3(k); 20 U.S.C. §1414(b)(4); and 34 CFR §300.321(a).

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Required Action: The district must ensure that meetings are conducted with required participants and that documentation of attendance is maintained in student's records. In order to demonstrate correction of noncompliance, the district must conduct training for speech-language specialists and develop an oversight mechanism to ensure compliance with the requirements in the citations listed above. A monitor from the NJDOE will conduct an on-site visit to interview staff, review meeting documentation, including sign in sheets, for meetings conducted between September 2015 and January 2016, and to review the oversight procedures.

Finding 13: The district did not consistently document all required considerations and statements in each IEP for students eligible for special education and related services and for students eligible for speech-language services. IEPs for students eligible for special education and related services did not include the identification of the liaison to post secondary resources as part of the required age 14 post-school transition components. IEPs for students eligible for speech-language services did not include measurable annual goals and objectives and consideration of an extended school year program.

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

Required Action: The district must ensure each IEP contains the required considerations and statements. In order to demonstrate correction of noncompliance, the district must conduct training for child study team members and speech-language specialists and develop an oversight mechanism to ensure compliance with the requirements in the citations listed above. In addition, to demonstrate correction of individual instances of noncompliance, the district must conduct annual review meetings and revise IEPs for the specific students whose IEPs were identified as noncompliant. A monitor from the NJDOE will conduct an on-site visit to interview staff, review the revised IEPs along with a random sample of IEPs developed at meetings conducted between September 2015 and January 2016, and to review the oversight procedures. The names of the students whose IEPs were identified as noncompliant will be provided to the district by the monitor. For assistance with correction of noncompliance, the district is referred to the state IEP sample form which is located at: www.statenj.us/education/specialed/forms.

Finding 14: 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. IEPs did not consistently include:

- the supplementary aids and services considered;
- an explanation of why the supplementary aids and services were rejected;
- a comparison of the benefits provided in the regular class and the benefits provided in the special education class; and

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- for those students placed in separate settings, activities to transition the student to a less restrictive environment.

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

Required Action: The district must ensure when determining the educational placement of a child with a disability, the IEP team considers the general education class first and all required decisions regarding placement are documented in the IEP for each student removed from general education for more than 20 percent of the school day. The district must also ensure for students placed in separate settings, the IEP team 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 and develop an oversight mechanism to ensure compliance with the requirements in the citations listed above. To demonstrate that the district has corrected the individual instances of noncompliance, the district must conduct annual review meetings and revise the IEPs for the specific students that were identified as noncompliant. A monitor from the NJDOE will conduct an on-site visit to interview staff, review the revised IEPs, along with a sample of IEPs developed at meetings conducted between September 2015 and January 2016, 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 15: 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. Specifically, evaluation reports did not consistently include the observation of the student in other than a testing setting.

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

Required Action: The district must ensure that all components of the functional assessment are conducted as part of the initial evaluation process. 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 initial evaluation reports completed between September 2015 and January 2016, and to review the oversight procedures.

Finding 16: The district did not conduct meetings within 20 calendar days of receipt of a written request for evaluation for students referred for speech-language services.

Citation: N.J.A.C. 6A:14-3.3(e), 3.4(j).

Required Action: The district must ensure that identification meetings are conducted within 20 calendar days of receipt of a written request for evaluation and that required

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participants are in attendance. In order to demonstrate correction of noncompliance, the district must conduct training for speech-language specialists and develop an oversight mechanism to ensure compliance with the requirements in the citations listed above. A monitor from the NJDOE will conduct an on-site visit to interview staff, review documentation from meetings conducted between September 2015 and January 2016, and to review the oversight procedures.

Finding 17: The district did not consistently conduct multidisciplinary initial evaluations for students referred for speech-language services by obtaining an educational impact statement from the classroom teacher.

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

Required Action: The district must ensure that a multidisciplinary evaluation is conducted for students referred for speech-language services by obtaining a statement from the general education teacher that details the educational impact of the speech problem on the student's progress in general education. In order to demonstrate correction of noncompliance, the district must conduct training for speech-language specialists and develop an oversight mechanism to ensure compliance with the requirements in the citation listed above. A monitor from the NJDOE will conduct an on-site visit to interview staff, review initial evaluation reports for students referred for speech-language services whose eligibility meetings were held between September 2015 and January 2016, and to review the oversight procedures.

Finding 18: The district did not consistently conduct reevaluations within three years of the previous classification date for students eligible for special education and related services.

Citation: N.J.A.C. 6A: 14-3.8(a) and 20 U.S.C. §1414(a)(2).

Required Action: The district must ensure that reevaluations are conducted within required time lines. 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 documentation of eligibility meetings held as part of the reevaluation process between September 2015 and January 2016, and to review the oversight procedures.

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.