



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

December 10, 2015

Mr. Paymon Rouhaniford
State District Superintendent
Camden City School District
201 North Front Street
Camden, NJ 08102

Dear Mr. Rouhaniford:

The New Jersey Department of Education has completed a review of funds received and disbursed from one or more federal programs by the **Camden City School District**. 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, 2014 through May 18, 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 www.state.nj.us/education/finance/jobs/monitor/consolidated.

Utilizing the process outlined in the attached "Procedures for State-Operated School Districts Response, Corrective Action Plan and Appeal Process," the Camden City School District 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 Carla Spates at (609) 984-5968.

Sincerely,

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

RJC/CS/dk:Camden City School District Cover Letter /consolidated monitoring
Enclosures

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**CAMDEN CITY SCHOOL DISTRICT
201 NORTH FRONT STREET
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New Jersey K-12 Education

**CONSOLIDATED MONITORING REPORT
DECEMBER 2015**

District: Camden City School District
County: Camden
Dates On-Site: May 18, 2015 through May 21, 2015
Case #: CM-010-14

FUNDING SOURCES

Program	Funding Award
Title I, Part A	\$ 9,324,961
Title I SIA, Part A	2,122,200
Title II, Part A	3,299,016
Title III, Part A	292,912
IDEA Basic	4,461,810
IDEA Preschool	198,092
Race To The Top	930,157
Carl D. Perkins	149,421
Total Funds	<hr/> <hr/> \$ 20,778,569

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BACKGROUND

The Elementary and Secondary Education Act (ESEA) and the Individuals with Disabilities Act (IDEA) and other federal laws require that districts provide programs and services based on the requirements specified in each of the authorizing statutes (i.e., ESEA, IDEA, Race to the Top, and Carl D. Perkins). The laws further require that state education agencies (SEAs), 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 Camden City 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 were 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 I SIA, Part I (Title I SIA); Title II, Part A (Title II); Title III, Part A (Title III); Carl D. Perkins (Perkins); Race To the Top; IDEA Basic and Preschool for the period July 1, 2014 through May 18, 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 I SIA, Title II, Title III, Perkins, Race to the Top, and IDEA Basic and Preschool from July 1, 2014 through May18, 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, TITLE III, IDEA, RACE TO THE TOP AND CARL D. PERKINS FUNDS

Title I

The district used its FY 2015 Title I funds to implement schoolwide programs in all its schools. Primarily, the district provided supplemental instructional opportunities through in-class support (response to intervention) and extended day and extended year programs. The district also used Title I funds to support increased use of technology and professional development.

Title II

The district used its FY 2015 Title II funds for professional development and stipends for professional development with a concentration in literacy, mathematics, and teacher evaluation programs.

Title III

The district has approximately 1,000 English Language Learners (ELLs) in bilingual, sheltered instruction, and English as a Second Language programs. FY 2015, Title III funds were used to fund salaries for afterschool programs, family programs, professional development, materials, and supplies.

IDEA Projects (Special Education)

The district used its FY 2015 IDEA Basic funds to reduce district tuition expenditures for students receiving special education services in private schools for students with disabilities. A portion of funds were allocated to purchase instructional programs, instructional supplies, technology, and professional development for both instructional staff and support staff. In addition, funds were used for child study team supplies and testing materials. The district's nonpublic proportionate share was used to provide supplemental instruction in speech therapy services for students attending nonpublic schools.

Carl D. Perkins

The district purported to have used its FY 2015 Perkins funds to operate 11 Career and Technical Education (CTE) programs.

Race To The Top

The district used its Race To The Top funds to support infrastructure improvements, professional development, and stipends for its STEM program.

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DETAILED FINDINGS AND RECOMMENDATIONS

Title I

Finding 1: The district did not provide school-level Title I parental involvement policies for all its Title I schools.

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

Required Action: The district should provide technical assistance to its schools in the development of school-level parental involvement policies and ensure that its schools work with their stakeholder groups to develop the policies and review them annually. The district also must submit evidence of engaging parents in the development and review of the school-level policies (e.g., meeting agenda, sign in sheets, minutes, and invitational letter/flyer).

Finding 2: The FY 2015 school-parent compacts outlined the responsibilities of the parents and students only. The compacts did not include the roles and responsibilities of the respective schools. The exclusion of the schools' roles and responsibilities did not offer all parties an opportunity to understand their role in the shared responsibilities for student academic achievement.

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

Required Action: The district must include the roles and responsibilities for the school, parent, and student in the school-parent compact. The district must submit the revised 2015-2016 school-parent compact to the NJDOE for review.

Finding 3: The district's parents' web page did not contain the required annual notifications for parental involvement.

Citation: ESEA §1111(h)(2)(E): *Public Dissemination*.

Required Action: The district must review and update its parental involvement web page containing required annual notifications and documents to meet the broader ESEA dissemination requirement. The district must submit the link for the updated web page to the NJDOE for review.

Finding 4: There was no evidence that the district distributed the Parents' Right-to-Know Highly Qualified Teacher (HQT) letter to all parents for the 2014-2015 school year. The issuance of this letter informs all parents of their right to ask about the qualifications of their children's teachers.

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

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Required Action: The Parents' Right-to-Know HQT letter must be distributed annually to the parents of all students who attend district Title I Schools. A template of the letter can be found at: <http://www.state.nj.us/education/title1/hqs/rtk.htm>.

Finding 5: The district's middle and high schools have teachers who do not meet the HQT requirements and as such, the schools should have issued the Parents' Right-to-Know HQT follow-up letter by November 1, 2014. The schools are required to send this letter to the parents of any child who is taught for four or more consecutive weeks by a teacher who has not met the HQT requirements.

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

Required Action: The schools must develop the HQT follow-up letter and send a copy to the NJDOE for review. A template of the HQT follow-up letter can be found at: <http://www.state.nj.us/education/title1/hqs/rtk.htm>. Upon review by the NJDOE, the schools may need to issue the HQT follow-up letter to the parents of any child taught by unqualified staff for four or more consecutive weeks.

Finding 6: The district failed to submit a timely TPAF/FICA reimbursement report for FY 2014. The report was due October 1, 2014 and was filed on or about December 8, 2014. The liquidation was paid after the state imposed 45 day liquidation period and was not allowed to be charged to the FY 2014 Title I, Part A Final Expenditure 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 TPAF/FICA reimbursement. The district should also review the report to determine if other unallowable costs were included in the report.

Finding 7: The district did not have signatures on the required supporting documents to verify the activity of staff charged to the Title I grant, but did have the supporting schedules. The time sheets must be signed by all staff charged to the grants. This documentation is necessary to verify that grant funded personnel are performing responsibilities consistent with the intent and purpose of the grant.

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 obtain signatures on the time and activity sheets of all staff charged to the grant, and submit these time and activity sheets to the NJDOE for review.

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Title II

Finding 8: The district did not have completed district-based or completed school-based professional development plans. All school districts in New Jersey are required to create an annual district-level professional development plan and all schools are required to create school-level professional development plans. Activities in the school-level plans must be consistent with the district professional development plan. The district-level and school-level plans must align with New Jersey's definition of Professional Development and Professional Development Standards for Teachers, as well as the New Jersey Standards for Professional Learning.

Citation: ESEA §2122. N.J.A.C. 6A:10-3.2.

Required Action: The district and the schools must create professional development plans that are consistent with professional development funded activities. The district must submit these professional development plans to the NJDOE for review.

Finding 9: The district used a portion of its Title II funds (\$142,920) to pay for professional development related to its teacher evaluation system. As teacher evaluation systems are mandated by the State of New Jersey, federal Title II funds cannot be used for this activity. This expenditure supplanted state/local funds.

Citation: ESEA §2123 (b): *Supplement not Supplant.*

Required Action: The district must remit \$142,920 to the NJDOE, which represents costs that were used incorrectly for professional development related to the district's teacher evaluation system. Since teacher evaluation systems are mandated by the State of New Jersey, Title II funds cannot be used to support this type of activity, otherwise, the district is supplanting state/local funds.

Finding 10: A review of district's special education teachers' personnel folders determined that not all special education teachers who provided primary instruction in a self-contained environment were highly qualified. All possessed only a K-5 or K-8 certification along with a special education certification. In addition, the New Jersey HQT Identification Forms were not completed and available.

Citation: ESEA §1119 – *Qualifications for Teachers and Paraprofessionals.* ESEA §1111(h)(6)(B)(ii) – Right to Know Letter.

Required Action: The district must identify all teachers in the middle schools who are not highly qualified. Unless a middle school teacher, providing direct instruction in a self-contained classroom in a departmentalized middle school is highly qualified, this teacher(s) can no longer provide primary instruction to special education students. The district also must develop the HQT follow-up letter and send a copy to the NJDOE for review. The HQT follow-up letter template may be accessed via the following link: <http://www.nj.gov/education/title1/hqs/rtk.shtml>. Upon review by the NJDOE, the school(s)

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must issue the HQT letter to the parents of any child taught by unqualified staff for four or more consecutive weeks. Additionally, the district must develop and implement internal controls to ensure that its personnel records contain the New Jersey HQT Identification Form.

Finding 11: The district used a portion of its Title II funds (\$188,000) to support a literacy assessment program from the University of Chicago. This is a formative assessment tool and not professional development; therefore, Title II funds cannot be used to support this program. This expenditure supplanted state/local funds.

Citation: ESEA §2123 (b): *Supplement not Supplant.*

Required Action: The district must remit \$188,000 to the NJDOE, which represents costs that were used incorrectly to support a literacy assessment program from the University of Chicago. Title II funds cannot be used to support this type of activity, otherwise, the district is supplanting state/local funds.

Title III

Finding 12: The district's parental notification letter did not outline all the Title III parental notification requirements. Although the district had a parental notification letter for students identified as ELLs, there was no letter for parents that specifically outlined the requirements of Title III. The missing elements that need to be included in the parental notification letter are: 1) How students will meet the state standards; 2) Students' level of English proficiency; 3) How such level was assessed; 4) How the program will meet the needs of the child in attaining English and meeting state standards; 5) Program exit requirements; 6) Expected rate of transition out of the program; and 7) How the program will meet the objectives of an individualized education program of a child with a disability.

Citation: ESEA 3302 *Parental Notification.*

Required Action: The district must develop a Title III parental notification letter that outlines the specific requirements as indicated above for the Title III parental notification letter. The district must submit the revised letter to the NJDOE for review. For further information on the requirements that must be in the letter, please refer to the following link: <http://www.state.nj.us/education/bilingual/title3/accountability/notification/title3par.htm>.

Finding 13: Title III funds were used to pay for computer programs in nonpublic schools that were not used specifically for Title III students. Programs included a school-wide subscription to Brain Pop and Learning A-Z. This expenditure supplanted state/local funds, as Title III funds are to be used specifically for Title III students. This limits other Title III supplemental spending and restricts ELLs' access to services provided by appropriately certificated staff.

Citation: ESEA 3115(g) *Supplement, Not Supplant.*

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Required Action: The district must remit \$4,018.35 to the NJDOE, which represents costs used incorrectly for computer programs in nonpublic schools that were not specifically used for Title III students. Title III funds cannot be used to support this type of activity, otherwise, the district is supplanting state/local funds.

Finding 14: The Title III improvement plan submitted to the NJDOE was completed, but the timeline for implementation was not followed. The district needs to follow the timelines it established. This limits the effectiveness of program services for ELLs.

Citation: ESEA 3122 *Achievement Objectives and Accountability*.

Required Action: The district must submit a timeline that demonstrates measurable progress toward improvement plan goals to the Office of Supplemental Education Programs for review.

Finding 15: Title III funds were used to pay for family programs and teacher certification courses that were not described in the Title III allowable uses section of the ESEA-NCLB Consolidated Subgrant Application. This restricts students from receiving services reviewed for allowability by the NJDOE.

Citation: ESEA 3115(d) *Authorized Subgrantee Activities*.

Required Action: If the district budgets FY 2016 Title III funds for family programs and teacher certification courses, the district must submit documentation to verify that the Title III Allowable Uses section of the FY 2016 ESEA-NCLB Consolidated Subgrant Application includes a detailed description of this type of use.

Finding 16: Title III funds were used to pay for 24 packets of disinfectant wipes. This expenditure supplanted state/local funds as it is not an allowable use of Title III funds.

Citation: ESEA 3115(g) *Supplement, Not Supplant*.

Required Action: The district must remit \$180.24 to the NJDOE, which represents costs that were used incorrectly to pay for 24 packets of disinfectant wipes. Title III funds cannot be used to support this type of activity, otherwise, the district is supplanting state/local funds.

IDEA (Special Education)

Finding 17: The district did not consistently inform parents regarding meetings through the provision of notices of meetings for students referred and/or eligible for special education.

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 child study team members and develop an oversight mechanism to

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ensure compliance with the requirements in the citations listed above. A monitor from the NDJOE will conduct an on-site visit to interview staff, review notices for meetings conducted between January 2016 and April 2016, and to review the oversight procedures.

Finding 18: The district did not consistently inform parents of proposed actions through provision of written notice within 15 calendar days following meetings for students eligible for special education and related services and for 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 January 2016 and April 2016, and to review the oversight procedures.

Finding 19: The district did not consistently obtain written parental consent to conduct an initial evaluation and implement the initial IEP for students currently eligible for special education and related services and students eligible for speech-language services.

Citation: N.J.A.C. 6A:14-2.3(a)1-2; 20 U.S.C. §1414(a)(1)(b); and 34 CFR §300.300.

Required Action: The district must ensure that informed parental consent is obtained prior to conducting assessments as part of the initial evaluation and implementing the initial IEP. 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. A monitor from the NJDOE will conduct an on-site visit to interview staff, review documentation of written parental consent to conduct initial evaluations and implement initial IEPs for student evaluated between January 2016 and April 2016, and to review the oversight procedures.

Finding 20: The district did not provide to students eligible for special education and related services written notice of graduation within required time lines.

Citation: N.J.A.C. 6A:14-4.11(b).

Required Action: The district must ensure that parents or adult students are provided with written notice prior to graduation. 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.

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A monitor from the NJDOE will conduct an on-site visit to interview staff, review written notice of graduation provided to students who are graduating at the conclusion of the 2015-2016 school year, and to review the oversight procedures.

Finding 21: The district did not consistently provide to students eligible for special education and related services a summary of academic achievement and functional performance prior to graduating and/or exiting the program.

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

Required Action: The district must ensure that students are provided with their summary of academic achievement and functional performance prior to graduation that addresses all required components. In order to demonstrate correction of noncompliance, the district must conduct training for child study team members 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 summary of academic achievement and functional performance provided to students at the conclusion of the 2015-2016 school year, and to review the oversight procedures.

Finding 22: The district did not consistently conduct annual review meetings within the required one year timeline 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(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 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 IEPs developed at annual review meetings held between January 2016 and April 2016, and to review the oversight procedures.

Finding 23: The district did not consistently convene meetings with required participants for students eligible for special education and related services and for students eligible for speech-language services. In addition, sign in sheets were not consistently maintained as part of meeting documentation.

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

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 child study team members and speech-language specialists and develop an oversight

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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 January 2016 and April 2016, and to review the oversight procedures.

Finding 24: The district did not document all required considerations and statements in each IEP for students eligible for special education and related services. IEPs did not include:

- Age 14 post-school transition components;
- Age 16 post-school transition components;
- Documentation of the consideration of the need for extended school year services;
- Measurable annual goals and objectives (including criteria for mastery);
- Statement of how progress towards annual goals will be measured; and
- All required components of the Statement of Present Levels of Academic Achievement and Functional Performance.

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:14-3.7(e)7(i); 20 U.S.C. §1412(a)(16)(A); and 34 CFR §300.158-300.161; 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 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 additional IEPs developed at meetings conducted between January 2016 and April 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 25: The district did not consistently document in the IEPs of students removed from the general education setting for more than 20 percent of the school day, including students placed in separate settings, consideration of placement in the least restrictive environment. Specifically, IEPs did not consistently include:

- The supplementary aids and services considered;
- 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;

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- The potentially beneficial or harmful effects which a placement (general education) may have on the student with disabilities or the other students in the class; and
- For those students placed in separate settings, activities to transition the student to a less restrictive environment.

Citation: N.J.A.C. 6A:14-4.2 (a)8(i),(ii) and (iii); 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 also must ensure for students placed in separate settings, the IEP team identified activities to transition the student to a less restrictive environment and documented 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 who were identified as noncompliant. A monitor from the NJDOE will conduct an on-site visit to interview staff, review revised IEPs along with a sample of additional IEPs developed at meetings conducted between January 2016 and April 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 26: The district did not implement each student's IEP as required. Barriers were identified at the district and building level. Barriers included:

- Instruction was not provided by appropriately certified staff;
- Insufficient staff was employed to provide special education and related services (teachers, reading specialists, speech-language specialists, bilingual staff members, child study team members and related services providers);
- Special education teachers were pulled from their assignment in a co-taught classroom to act as a substitute teacher in other classrooms;
- Teachers were not reporting to their classroom on time, resulting in students being unsupervised for extended periods of time;
- Teachers whose schedules placed them in one classroom during a given class period, but were actually splitting their time between two classes;
- Lack of a full continuum of programs in the least restrictive environment;
- Unilateral decisions by building administrators to eliminate special education programs provided in their buildings;
- Unilateral decisions by building administrators to offer programs based on staffing and not student needs;
- Lack of professional development opportunities for teachers;
- Student files are incomplete;
- Teachers were not provided with content guides and instructional materials;

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- Current model for the provision of in-class support was ineffective;
- Special education teachers served in instructional assistant capacities; and
- General education teachers did not assume shared instructional responsibility for students in their classrooms who were eligible for special education and related services.

Citation: N.J.A.C. 6A:14-4.1(a); 20 U.S.C. §1412(a)(5); and 34 CFR §300.119.

Required Action: The district must ensure programs are provided in accordance with student IEPs. In order to demonstrate correction of noncompliance, the district must conduct training for child study team members, speech-language specialists, building level administrators, and district administration and develop an oversight mechanism to ensure compliance with the requirements in the citations listed above. The district must convene IEP meetings for all students impacted to discuss the need for compensatory services. A monitor from the NJDOE will conduct an on-site visit to interview staff, review IEPs and schedules for the current school year, and the schedule for the provision of compensatory services and to review the oversight procedures. The names of the students not receiving required services will be provided to the district by the monitor.

Finding 27: 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.b(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 invitations to IEP meetings to students age 14 and above for meetings conducted between January 2016 and April 2016, and to review the oversight procedures.

Finding 28: The district did not provide interventions in general education setting(s) to students exhibiting academic difficulties prior to referring the student for an evaluation. In addition, the district did not consistently maintain documentation of the description, frequency, duration and effectiveness of the interventions provided in the general education setting through the Intervention and Referral Service (I&RS) team.

Citation: N.J.A.C. 6A:14-3.3(b)-(c); 20 U.S.C. §1413(f)(2); and 34 CFR §300.226(b).

Required Action: The district must ensure interventions are provided in the general education setting for students exhibiting academic difficulties, prior to referring the student for an evaluation. The district also must ensure that when the I&RS team identifies interventions to meet the needs of a struggling learner, that the team identifies and maintains documentation of the nature, description, frequency, and duration of the interventions and

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measures the effectiveness. In order to demonstrate correction of noncompliance, the district must conduct training for administrators and I&RS 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 for students who were provided interventions in general education between January 2016 and April 2016, and to review the oversight procedures.

Finding 29: 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 or speech-language services.

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

Required Action: The district must ensure identification meetings are conducted within 20 calendar days of receipt of a written request for evaluation and that required participants are in attendance. 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. A monitor from the NJDOE will conduct an on-site visit to interview staff, review documentation from meetings conducted between January 2016 and April 2016, and to review the oversight procedures.

Finding 30: The district did not consistently conduct all required sections of the functional assessment as a component of an initial evaluation for students referred for special education and related services and students referred for speech-language services. Assessments did not contain observation in other than a testing environment.

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 referrals are processed in a timely manner; identification meetings are held within 20 days of receipt of referral with required participants; all components of a functional assessment are conducted; and all required assessments required to determine eligibility are conducted. 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. A monitor from the NJDOE will conduct an on-site visit to interview staff, review initial evaluations conducted between January 2016 and April 2016, and to review the oversight procedures.

Finding 31: 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).

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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 January 2016 and April 2016, and to review the oversight procedures.

Finding 32: The district did not ensure child study team participation at the planning conference of students transitioning from an early intervention program to preschool.

Citation: N.J.A.C. 6A:14-3.3(e)1; 20 U.S.C. §1414(d)(1)(D); and 34 CFR §300.321(f).

Required Action: The district must ensure that a member of the child study team participates in the planning conferences for each student transitioning from early intervention to preschool. 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 participation at transition planning conference for student transitioning from early intervention to preschool whose meetings were conducted between January 2016 and April 2016, and to review the oversight procedures.

Finding 33: The district did not consistently conduct reevaluations within three years of the previous classification date for students currently eligible for special education and related services and for students currently eligible for speech-language 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 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 of eligibility meetings held as part of the reevaluation process between January 2016 and April 2016, and to review the oversight procedures.

Required Action For All Special Education Findings: In order to address the findings of noncompliance with state and federal special education regulations, the Camden School District must create an integrated administrative structure to:

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- Develop district-wide procedures for pre-referral interventions, referral and identification, evaluation, implementation of IEPs, reevaluation and annual review;
- Conduct training of general and special education on these procedures;
- Embed goals regarding implementation of instructional frameworks and strategies, such as Universal Design for Learning and Collaborative Teaching, into school improvement plans to facilitate the inclusion of students with disabilities in rigorous, standards-based instruction with appropriate supports; and
- Expand oversight of and accountability for implementation of IEPs and special education procedures in each building.

To monitor progress toward achievement of these goals and verify correction of noncompliance, the Director of Special Services, and other district staff as needed, will meet regularly with staff from the NJDOE, Office of Special Education Programs.

Carl D. Perkins

The district is currently approved for the following CTE programs:

Program	CIP	Program of Study
Architectural Drafting and Architectural CAD/CADD	151303	N
Building Construction Technology	460415	N
Dance, General	500301	N
General Office Occupations and Clerical Services	520408	N
Accounting Technology/Technician & Bookkeeping	520302	N
Restaurant/Food Services Management	520905	Y
Web Page, Digital/Multimedia and Information Resources Design	110801	N
Computer Systems Networking and Telecommunications	110901	N
Apparel & Textile Manufacture	190902	N
Sales, Distribution, & Marketing Operations, General	521801	Y
Autobody/Collision & Repair Technology/Technician	470603	N

Finding 34: Although, a detailed list of required documents was provided to the district on May 21, 2015 (prior to the monitoring visit), the district did not provide any programmatic documentation to enable the monitoring team to conduct its comprehensive review. In light of this deficiency, the monitoring team was unable to determine which funds were targeted to support the approved CTE programs that meet the requirements of the Perkins legislature. As a result of the lack of supporting documentation/evidence, all of the district’s FY 2013-2014 and FY 2014-2015 Perkins expenditures are disallowed.

Citation: 34 CFR §§ 76.731: Records related to compliance and 76.910: Cooperation with audits. 34 CFR 80.42: Retention and access requirements for records. Perkins One-Year Grant Application Guidelines July 1, 2013 – June 30, 2014 and July 1, 2014 – June 30, 2015 (Perkins Guidelines), Section E: *Amendments, Reports and Other Actions*.

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Required Action: The district must submit the requested programmatic documentation, as prescribed in the previously provided Perkins Secondary Monitoring Tool, to the NJDOE, Office of Career and Technical Education; or remit all FY 2013-2014 and FY 2014-2015 Perkins grant funds for which the district has been reimbursed to the NJDOE.

Race To The Top

A review of the expenditures charged to the Race Top The Top grant 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 Carla Spates via phone at (609) 984-5968 or via email at carla.spates@doe.state.nj.us .