



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

July 29, 2015

Dr. Mary Gruccio, Chief School Administrator  
Vineland Public Schools  
625 Plum Street  
Vineland, NJ 08360-3796

Dear Dr. Gruccio:

The New Jersey Department of Education has completed a review of funds received and disbursed from one or more federal programs by the **Vineland 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 February 25, 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 Vineland 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:Vineland BOE CM Cover Letter  
Enclosures

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*New Jersey K-12 Education*

**CONSOLIDATED MONITORING REPORT  
JULY 2015**

**District:** Vineland Public Schools  
**County:** Cumberland  
**Dates On-Site:** February 25 and 26, 2015  
**Case #:** CM-016-14

**FUNDING SOURCES**

Program	Funding Award
Title I, Part A	\$ 2,747,762
Title II, Part A	514,807
Title III, Part A	196,859
IDEA Preschool	89,062
IDEA Basic	3,328,159
Race to the Top	297,409
Carl D. Perkins	97,255
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Total Funds	\$ 7,271,313

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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 Vineland 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, Part A (Title III); Race to the Top; Carl D. Perkins (Perkins); and IDEA Basic and Preschool for the period July 1, 2013 through February 25, 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, Title III, Race to the Top, Perkins, and IDEA Basic and Preschool from July 1, 2013 through February 25, 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, CARL D. PERKINS AND RACE TO THE TOP FUNDS**

**Title I**

The district operates schoolwide programs in 13 of its Title I funded schools and a targeted assistance program in one of its funded schools. Primarily, the district provides supplemental instructional opportunities through in-class support (response to intervention), extended day and extended year programs.

**Title II**

The district blends approximately 85 percent of its Title II funds. Title II funds are dedicated for professional development, stipends for professional development and supplies and materials. The professional development is concentrated on Children's Literacy and integration of technology into the curriculum. The district's and schools' professional development plan is consistent with the professional development offered.

**Title III**

The district has approximately 800 English Language Learners (ELL) in bilingual and English as a Second Language programs. Title III funds are used to fund a bilingual teacher's salary, sheltered instruction workshops, summer programs, software, translations, and family programs.

**IDEA Projects (Special Education)**

The district is using its FY 2014-2015 IDEA Basic funds to reduce district tuition expenditures for students receiving special educational services in private schools for students with disabilities. A portion of the funds are allocated to purchase instructional supplies, technology, and professional development for both instructional staff and support staff. In addition, funds will be used for child study team supplies and testing materials. The district's nonpublic proportionate share is used to provide supplemental instruction and speech therapy services for students attending nonpublic schools.

**Carl D. Perkins**

The district uses Perkins funds to support the current approved Career and Technical Education (CTE) programs. Funds are being used to support supplies, equipment, and other purchased services for: Architectural Drafting and Architectural CAD/CADD 151303; Radio and TV Broadcasting 100202; Computer Programming 110201; Sales, Distribution Marketing 521801; Automobile/Automotive Mechanics 470604; and Graphic Design 50049. The following Classification of Instructional Programs (CIP) codes have not been reapproved by the district and are not supported with Perkins funds: General Office Occupations and Clerical Services 520408; Management Information Systems 521201; and Web Page, Digital/Multimedia and Information 110801.

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**Race to the Top**

The district was part of a pilot project for ED CONNECT. They were able to use Ed Connect for the district's instruction improvement system (IIS). The entire Race to the Top funding was dedicated to a STEM initiative. The district was given guidance by the DOE in developing and approving the program. Funds were used for professional development, computers and supplies.

**DETAILED FINDINGS AND RECOMMENDATIONS**

**Title I**

**Finding 1:** The district's use of Title I funds to purchase tee shirts and ponchos (Custom Graphics) for Landis Middle School, is an unallowable expenditure since Title I funds cannot be used for advertising.

**Citation:** OMB Circular A-87, Attachment B, *Cost Principles for State, Local and Indian Tribal Governments, Section 1, Advertising.*

**Required Action:** The district must reverse the expenditure of FY 2014-2015 Title I funds for the tee shirts and ponchos and use state/local funds instead. The district must provide documentation of the adjusting journal entry to the NJDOE for review.

**Finding 2:** The district's use of Title I funds to purchase computers in the Max Leuchter Elementary School, the only school in the district that operates a targeted assistance program, supplanted state/local funds.

**Citation:** OMB Circular A-87, Attachment B, *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 expenditure of FY 2014-2015 Title I funds for the computers and use state/local funds instead. The district must provide documentation of the adjusting journal entry to the NJDOE for review.

**Finding 3:** The district's use of Title I funds for expenditures not linked to an educational objective (i.e. bouncing buddies and tents for field day events) for Winslow Elementary School, is an unallowable expenditure since Title I funds may not be used for entertainment related activities.

**Citation:** OMB Circular A-87, Attachment B, *Cost Principles for State, Local and Indian Tribal Governments, Section 14, Entertainment, ESEA §1120A(b) Fiscal Requirements, Federal Funds To Supplement, Not Supplant, Non-federal Funds.*

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**Required Action:** The district must reverse the expenditure of FY 2014-2015 Title I funds for bouncing buddies and tents and use state/local funds instead. The district must provide documentation of the adjusting journal entry to the NJDOE for review.

**Finding 4:** The district issued a purchase order for professional services with Children's Literacy Initiative for \$53,000 without competitive contracting.

**Citation:** EDGAR, PART 80--*Uniform Administrative Requirements for Grants and Cooperative Agreements to State and Local Governments*, Section 36, Procurement.

**Required Action:** The district must implement procedures to keep records of bids, quotes or competitive contracting in compliance with procurement standards issues by the federal government or the State of New Jersey (whichever is the most restrictive). The district must develop policies and procedures to prevent procurement errors in the future. A copy of the newly developed policies and procedures must be sent to the NJDOE for review.

**Finding 5:** The district could not provide evidence that its Title I schools convened an annual Title I parent meeting. In a Title I schoolwide program, all parents/guardians are entitled to be informed about the school's Title I program, legislative requirements, and how they can be actively engaged in helping their child/children succeed academically.

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

**Required Action:** For the 2015-2016 school year, the district must ensure that its Title I schools convene an annual Title I meeting to inform all parents of the legislative requirements and the school's Title I program. The district must submit documentation of the meetings (e.g., invitational letter/flyer, agenda, meeting minutes, and sign in sheets) to the NJDOE for review.

**Finding 6:** The district's Title I schools did not have a parental involvement program that reflected the requirements of the Title I legislation. The district provided limited evidence that schools maintained an active stakeholder committee that was involved in the development of the Schoolwide Plan. There was no evidence, such as meeting notes, agendas and sign in sheets, that the committees were consulted in the development and implementation of the Title I Schoolwide Plan.

**Citation:** ESEA 1114(b)(2)(B)(ii): *Plan Development*.

**Required Action:** The district's Title I schools must convene and/or consult with its stakeholder committees for input and peer review before changes are made to the Schoolwide Plan. These meetings and consultations must be documented with agendas, sign in sheets and minutes submitted to the committee members for review and approval. The schools must provide documentation to the NJDOE that its FY 2015-2016 Schoolwide Plan is developed in consultation with its stakeholder committees. Failure to

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provide this documentation will result in revocation of the schools' authority to operate schoolwide programs.

**Finding 7:** There was no evidence that the district reviewed its parental involvement policy for the current school year.

**Citation:** ESEA §1118(a)(2): *Parental Involvement (Written Policy)*.

**Required Action:** The district must submit copies of a recent board approved district parental involvement policy, including minutes from the board meeting, to the NJDOE for review.

**Finding 8:** 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's Title I schools must also submit evidence of engaging parents in the development and review of the school-level policies (meeting agendas, sign in sheets, minutes).

**Finding 9:** The district did not provide evidence that the schools' FY 2014-2015 school-parent compacts were developed in conjunction with Title I parents. The absence of parental participation in developing these required documents excluded parents from more active participation in their child's educational program.

**Citation:** ESEA §1118: *Parental Involvement*.

**Required Action:** The district's Title I schools must include parents in the development of the school-parent compact. The district must submit documentation (e.g., meeting agendas, sign in sheets, and minutes) that its schools involved parents in the development of the FY 2014-2015 school-parent compact.

**Finding 10:** The district's parental 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.



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**Finding 11:** There was no evidence that the district distributed the Parents' Right-to-Know Highly Qualified Teacher (HQT) letter to all parents for the current school year. The issuance of this letter informs all parents of their right to ask about the qualifications of their child's teachers.

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

**Required Action:** Annually, the district must distribute the letter no later than October 15 of the school year. A template of the letter can be found at: <http://www.state.nj.us/education/title1/hqs/rtk.htm>.

**Finding 12:** A teacher at Johnstone Elementary School did not meet the HQT requirements; therefore, the school should have issued the Parents' Right-to-Know HQT follow-up letter by November 1, 2014. The school is 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 school 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 school must issue the HQT follow-up letter to the parents of any child taught by unqualified staff for four or more consecutive weeks.

**Finding 13:** The district did not have a viable Title I program in Max Leuchter Elementary School, and the district was unable to articulate how it could use Title I funds to provide services to the school's low-performing students.

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

**Required Action:** The district must determine how they will use these funds to service their low-performing students and submit its plan for a Title I program to the NJDOE for review.

**Finding 14:** The district did not have clear and distinguishable identification criteria for its Title I students at the Max Leuchter Elementary School. Therefore, ineligible students benefited from services that should have been for the lowest-performing students in the school. In targeted assistance programs, districts must identify and target Title I services to students who are most academically at risk for not attaining proficiency on challenging state academic standards assessments.

**Citation:** ESEA §1115(B): *Targeted Assistance Programs (Eligible Children from Eligible Population)*.

**Required Action:** The district must establish clear and distinguishable identification criteria based upon multiple educationally related criteria for its identified Title I

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students. The district must submit the FY 2015-2016 entrance criteria for the Title I program to the NJDOE for review.

**Finding 15:** For FY 2014-2015, the district did not develop and distribute the Title I participation letters stating both entrance and exit criteria, remediation strategies and the option to opt-out to parents of identified students at the Max Leuchter School. Without this information, parents were unable 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 Program*; ESEA §1118(c): *Parental Involvement (Policy Involvement)*.

**Required Action:** In FY 2015-2016, the district must provide all parents/guardians of Title I students at the Max Leuchter School with a Title I participation letter. The participation letter must include the multiple measures, and entrance and exit criteria used to identify the students, as well as clearly defined exit criteria. The district must provide a copy of the FY 2015-2016 Title I participation letter to the NJDOE for review.

**Finding 16:** The activities in each school's Schoolwide Plan did not correspond to the use of Title I funds. In a Title I schoolwide program, the school must use Title I funds and services to upgrade the entire educational program while continuing to provide services to its lowest-performing students. The Schoolwide Plan becomes the mechanism for the school to document its efforts to meet the purpose and intent of the Title I legislation, and how the Title I funds will be used to support the program.

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

**Required Action:** The schools must make required changes to the Schoolwide Plans and resubmit for approval. Each Schoolwide Plan must be revised to reflect the current programs being delivered in each school and address the needs of the full continuum of students (including students with disabilities and gifted and talented students). The schools must submit a copy of the revised plans to the NJDOE for review.

**Finding 17:** The district's Nonpublic School Participation Refusal form did not include the amount of Title I funds generated to provide equitable services to eligible resident nonpublic school students.

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

**Required Action:** For FY 2015-2016, the district's Nonpublic School Participation Refusal form must indicate the amount of Title I funds generated for equitable services to eligible resident nonpublic school students. The district must submit a copy of the form to the NJDOE for review.

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**Title II**

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

**Title III**

**Finding 18:** FY 2014-2015 Title III funds were used to pay teachers for state-required language proficiency testing. Title III funds cannot be used to supplant funding for testing required by state law and code. In addition, this limits other Title III supplemental spending and restricts ELL's access to needed services.

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

**Required Action:** The district must reverse the FY 2014-2015 charges to the Title III grant and use state/local funds for these salaries. The district must send documentation of the adjusting journal entry to the NJDOE for review.

**Finding 19:** Title III funds were used to pay teachers for translation services that were not Title III specific. Title III funds cannot be used to supplant funding for translations required by civil rights laws and state code. This limits other Title III supplemental spending and restricts ELLs' access to needed services.

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

**Required Action:** The district must reverse the charges and use state/local funds for these translations. The district must send documentation of the adjusting journal entry to the NJDOE for review.

**Finding 20:** Title III funds were used to pay for a bilingual teacher who does not have a bilingual/bicultural teaching certificate. Title III funds cannot be used for teachers who do not have a certificate to teach in a language instruction program. This limits other Title III supplemental spending and restricts ELLs' access to services provided by appropriately certificated staff.

**Citation:** ESEA §3116 *Local Plans.*

**Required Action:** The district must reverse the charges and use state/local funds for the salary. The district must send documentation of the adjusting journal entry to the NJDOE for review.

**IDEA (Special Education)**

**Finding:21:** The district included students' names on purchase orders for students educated in tuition placements; therefore, violating student confidentiality.

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**Citation:** IDEA regulation 34 CFR 99; N.J.A.C. 6A:32-7.

**Required Action:** The district must revise procedures to ensure that confidentiality of student information is maintained and that only persons having educational responsibility for those students have access to this information. These revised procedures must be submitted to the NJDOE for review.

**Finding 22:** The district did not consistently ensure that the required participants were in attendance at identification, reevaluation planning, and determination of continued eligibility following reevaluation meetings for students referred and/or eligible for special education and related services.

**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 records. 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 meeting documentation, including sign in sheets, for meetings held between September 2015 and November 2015, and to review the oversight procedures.

**Finding 23:** The district did not document all required considerations and statements in each IEP.

IEPs for students eligible for special education and related services did not include;

- age 14 post-school transition components;
- frequency and duration of services; and
- documentation of the consideration of the need for extended school year services.

IEPs for students eligible for speech language services did not include documentation of the consideration of the need for extended school year services.

**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 that 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

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revised IEPs and a random sample of additional IEPs developed at meetings conducted between September 2015 and November 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. 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](http://www.statenj.us/education/specialed/forms).

**Finding 24:** 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, and/or an explanation of why they were rejected;
- 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 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 revised IEPs, along with a random sample of additional IEPs developed at meetings conducted between September 2015 and November 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 25:** 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).

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

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**Required Action:** The district must ensure 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 measures the effectiveness. In order to demonstrate correction of noncompliance, the district must conduct training for administrators and I&RS staff 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 I&RS team members and teachers, review documentation for students who were provided interventions in general education between September 2015 and November 2015, and to review the oversight procedures.

**Finding 26:** The district did not conduct meetings within 20 calendar days of receipt of a written request for a child study evaluation or a speech-language evaluation to determine if an evaluation was warranted.

**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 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 September 2015 and November 2015, and to review the oversight procedures.

**Finding 27:** 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 for students referred for speech-language services.

**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 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 evaluation reports completed between September 2015 and November 2015, and to review the oversight procedures. For assistance with correction of noncompliance, the district is referred to the sample report form for speech-language evaluations which is located at: [www.state.nj.us/education/speced/forms](http://www.state.nj.us/education/speced/forms).

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**Finding 28:** 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 citations listed above. A monitor from the NJDOE will conduct an on-site visit to review initial evaluation reports for students referred for speech-language services whose eligibility meetings were held between September 2015 and November 2015, and to review the oversight procedures.

**Finding 29:** 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 early intervention referrals received between September 2015 and November 2015, and to review the oversight procedures.

**Finding 30:** The district did not consistently conduct reevaluations within three years of the previous classification date for students eligible for special education and related services and for students eligible for speech-language services.

**Citation:** N.J.A.C. 6A: 14-3.8(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

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reevaluation process between September 2015 and November 2015, and to review the oversight procedures.

**Carl D. Perkins**

**Finding 31:** The district did not provide opportunities for students to participate in Structured Learning Experiences in the three approved programs (Graphic Design, Architectural CADD, and Computer Programming).

**Citation:** Perkins §135(b)(3) and N.J.A.C. 6A:19-4.

**Required Action:** The district must offer CTE students opportunities to explore career interests through participation in structured learning experiences linked to the New Jersey Core Curriculum Content Standards in all approved CTE programs.

**Finding 32:** The district did not hold CTE advisory board meetings for any of their CTE programs.

**Citation:** Perkins: P.L. 109-270§134 (b) (5) and N.J.A.C. 6A:19-3.1 Program Requirements.

**Required Action:** The district must ensure that at least two advisory board meetings are held each project period for all approved CTE programs. Once the advisory boards have been established the district must submit a copy of the advisory board minutes and sign in sheets to their Perkins program officer. Programs without evidence of functioning advisory boards will not be considered approved programs and will not be eligible for future Perkins funding.

**Finding 33:** The district did not consult with their local Workforce Investment Board (WIB) regarding their Perkins One Year Funding Application.

**Citation:** Perkins Act 134(b)(5).

**Required Action:** The district must consult with all interested parties and the appropriate WIB. The district must maintain evidence of consultation with the WIB for review and monitoring purposes.

**Finding 34:** Expenditures for Perkins funded CTSO events included students who were not currently in approved CTE programs.

**Citation:** Perkins 135 (a) and (b)1-12.

**Required Action:** Perkins funds can only be spent on approved CTE Programs and students enrolled in currently approved CTE programs. The district must reclassify funds that were spent on programs/students not currently CTE approved.



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**Finding 35:** The district provided no documentation that curricula is current and incorporates the New Jersey 21<sup>st</sup> Century Life and Careers Standards.

**Citation:** Perkins Act 134(b) 1-12.

**Required Action:** The district must align their CTE curriculum to the New Jersey Core Curriculum Content Standards 9.1-9.3, 21<sup>st</sup> Century Life and Career Standards and the curriculum must be board approved.

**Finding 36:** The district was unable to provide documentation of a board approved Health and Safety Plan for their hazardous occupation (Automotive).

**Citation:** N.J.A.C 6A:19-6.5(a).

**Required Action:** The district must immediately develop a Career and Technical Education Health and Safety Plan. The district's plan must be adopted by the school board and submitted to: New Jersey Safe Schools Center for School and Community Based Research and Education. Attn: Dr. Derek Shendell, 335 George St., New Brunswick, NJ 08901.

The district is urged to contact Dr. Shendell for assistance in developing the CTE Health and Safety Plan.

**Finding 37:** Equipment purchased with Perkins funds for the FY 2013-2014 and FY 2014-2015 school years did not have a visible, permanently attached, and numbered inventory tags with the federal funding source included.

**Citation:** Perkins: P.L. 109-270 § 135 (b) 7, EDGAR 200.313 (a) (c) (4) (1) and (3).

**Required Action:** The district must ensure that all equipment purchased with Perkins funds have permanently attached and numbered inventory tags. The tags must also identify the source of funding (Perkins). The district must ensure that equipment purchased with Perkins funds is utilized primarily in the CTE programs for which it was approved.

**Race to the Top**

**Finding 38:** The district used \$32,328.18 in Race to the Top funds to purchase tables and chairs (PO 15-002259) for Science, Technology, Engineering and Math (STEM). This expenditure was not in the district's Race to the Top grant application. Further, the use of Race to the Top funds for such expenditures is not allowable.

**Citation:** American Recovery & Reinvestment Act, Section 14003, EDGAR, PART 80-*Uniform Administrative Requirements for Grants and Cooperative Agreements to State*

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*and Local Governments*, Section 20, Standards for financial management.

**Required Action:** The district must reverse the expenditure of Race to the Top funds for non-allowable expenses and use state/local funds instead. The district must provide documentation of the adjusting journal entry to the NJDOE for review.

**Administrative**

**Finding 39:** The district did not have internal control policies and procedures to prevent contracting with disbarred vendors and showed no evidence of checking for disbarred vendors on procurement requests.

**Citation:** EDGAR, PART 80--*Uniform Administrative Requirements for Grants and Cooperative Agreements to State and Local Governments*, Section 36, Procurement.

**Required Action:** The district should update internal control policies to prevent potential errors from occurring.

The NJDOE thanks you for your time and cooperation during the monitoring visit and looks forward to a successful resolution of all findings and implementation of all recommendations contained in this report.

If you have any questions, please contact Frank Basso via phone at (609) 984-5909 or via email at [frank.basso@doe.state.nj.us](mailto:frank.basso@doe.state.nj.us) .