



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 27, 2015

Dr. Mark Toback, Superintendent  
Wayne Township Public Schools  
50 Nellis Drive  
Wayne, NJ 07470

Dear Dr. Toback:

The New Jersey Department of Education has completed a review of funds received and disbursed from one or more federal programs by the **Wayne Township 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 28, 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 Wayne Township Board of Education is required, pursuant to N.J.A.C. 6A:23A-5.6, to publicly review and discuss the findings in this report at a public board meeting no later than 30 days after receipt of the report. Within 30 days of the public meeting, the board must adopt a resolution certifying that the findings were discussed in a public meeting and approving a corrective action plan which addresses the issues raised in the undisputed findings and/or an appeal of any **monetary** findings in dispute (emphasis added). A copy of the resolution and the approved corrective action plan and/or appeal must be sent to this office within 10 days of adoption by the board. Direct your response to my attention.

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

By copy of this report, your auditor is requested to comment on all areas of noncompliance and recommendations in the next certified audit submitted to the New Jersey Department of Education. If you have any questions, please contact Steven Hoffmann at (973) 621-2750.

Sincerely,

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

RJC/SH/dk:Wayne Twp. BOE CM Cover Letter  
Enclosures

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**STATE OF NEW JERSEY  
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**WAYNE TOWNSHIP BOARD OF EDUCATION  
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*New Jersey K-12 Education*

**CONSOLIDATED MONITORING REPORT  
JULY 2015**

**District:** Wayne Township Public Schools  
**County:** Passaic  
**Dates On-Site:** March 3, 4 and 6, 2015  
**Case #:** CM-034-14

**FUNDING SOURCES**

Program	Funding Award
Title I, Part A	\$ 553,019
IDEA Basic	2,060,658
IDEA Preschool	67,988
Title II, Part A	150,614
Title III	76,006
Title III Immigrant	61,117
Carl D. Perkins Grant	40,281
Total Funds	<u>\$ 3,009,683</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 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 Wayne Township Public Schools to monitor the district's use of federal funds and the related program plans, where applicable, to determine whether the district's programs are meeting the intended purposes and objectives, as specified in the current year applications and authorizing statutes and to determine whether the funds were spent in accordance with the program requirements, federal and state laws, and applicable regulations. The on-site visit included staff interviews and documentation reviews related to the requirements of the following programs: Title I, Part A (Title I); Title II, Part A (Title II); Title III; Title III Immigrant; IDEA Basic and Preschool; and Carl D. Perkins for the period July 1, 2013 through February 28, 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 district personnel, reviewed the supporting documentation for a sample of expenditures and conducted internal control reviews.

**EXPENDITURES REVIEWED**

The grants reviewed included Title I, Title II, Title III, Title III Immigrant, IDEA Basic and Preschool and Carl D. Perkins from July 1, 2013 through February 28, 2015. A sampling of purchase orders and/or salaries was taken from each program reviewed.

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**GENERAL DISTRICT OVERVIEW OF USES OF TITLE I, IDEA AND CARL D. PERKINS FUNDS**

**Title I Projects**

Title I funds were used for salaries and supplies to support the costs of a full day transition kindergarten program for identified students.

**IDEA Projects**

FY 2014-2015 IDEA Basic and Preschool funds were used to reduce district tuition costs for students receiving special educational services in approved private schools for students with disabilities and for the provision of special education and related services to students with disabilities in nonpublic settings.

**Carl D. Perkins**

The district has one approved career and technical education (CTE) program - Automobile/Automotive Mechanics Technology/Technician CIP Code 470604. The district's Perkins grant funds were used to purchase instructional supplies, professional services and instructional equipment.

**DETAILED FINDINGS AND RECOMMENDATIONS**

**Title I**

**Finding 1:** The district did not complete the detailed information for two of the selected priority problems: early childhood education and instructional skills and strategies on the Needs Assessment tab in the FY 2014-2015 ESEA-NCLB Consolidated Application.

**Citation:** ESEA §1112: *Local Educational Agency Plans.*

**Required Action:** The district must amend the FY 2014-2015 ESEA-NCLB Consolidated Application to complete and/or revise the Needs Assessment to accurately reflect the needs of the district students and staff and identify the ESEA-NCLB funding source(s) used to support the needs.

**Finding 2:** The district did not have a parental involvement program that reflected the Title I legislative requirements. There was no evidence the district's Title I parental involvement policy was reviewed and board adopted since October 20, 2011 and no evidence of current Title I school-level parental involvement policies. The annual review and current board adoption allow parents and other stakeholders to impact the parental involvement process and identify the unique needs of the Title I schools and parents of Title I students.

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

**Required Action:** For FY 2015-2016, the district must have a written district parental involvement policy that is evaluated annually with current board adoption. The district's Title I schools must also have current school-level parental involvement policies. Both policies must be developed with the input of associated stakeholders, including parents. Copies of a recent board approved district parental involvement policy and school-level policies must be submitted to the NJDOE for review. The district must also submit evidence (e.g., meeting agendas, sign in sheets and minutes) of parental input into the development of both policies.

**Finding 3:** For FY 2014-2015, the district's Title I schools did not provide Title I participation letter(s) informing parents of Title I eligible students about the Title I transitional kindergarten program. The Title I participation letter must have the following: multiple entrance and exit criteria; academic interventions; and an opt-out option. Without this information, parents are unable to understand the reasons for their child being selected to participate in the Title I program, what services are being provided, 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:** Each school must include in its Title I participation letter(s) the multiple measures used for Title I student identification and exit criteria for the program, intervention being provided, and an opt-out option. The district must provide a copy of each school's revised FY 2014-2015 Title I participation letter to the NJDOE for review.

**Finding 4:** The district utilized Title I funding to pay for kindergarten teachers and paraprofessionals to provide full-day kindergarten classes despite the fact that the district provided half-day kindergarten classes for all its elementary schools. As such, the portion of Title I funding expended for the half-day kindergarten program supplanted state/local funding.

**Citation:** ESEA §1120A(b): *Fiscal Requirements (Federal Funds to Supplement, Not Supplant, Non-Federal Funds)*.

**Required Action:** Title I funding can be used only for salaries and benefits to support the kindergarten program that is supplemental to the district wide half-day kindergarten program. The district must reverse the Title I salary and benefit expenditures for the kindergarten teachers and paraprofessionals that reflect their time during the half-day program. The district must allocate state/local funds for these costs, and provide the NJDOE with evidence of the journal entry to reverse the expenditures.

**Finding 5:** For the Title I funded teachers and paraprofessionals, the district did not consistently have the required supporting documents to verify the time and activity of the staff as required by

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federal law. The documentation must reflect what the staff is doing, when and where and it must match their funded percentage and be signed by the staff member and supervisor.

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

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

**Finding 6:** For FY 2014-2015, the district provided evidence of school-parent-student compacts for Ryerson and John F. Kennedy Elementary Schools, but not for Pines Lake Elementary School. The district did not provide evidence for all three schools that the school-parent-student compacts were developed in conjunction with Title I parents. The absence of parent participation in developing these required documents excluded parents from more active participation in their child's educational program.

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

**Required Action:** The district must develop school-parent-student compacts for all Title I served schools with the input of Title I parents/guardians and associated stakeholder groups and document the development process for FY 2015-2016. The district must provide documentation (e.g., invitational letters, flyers, sign in sheets, meeting notes) of involving parents in the development of the FY 2015-2016 school-parent-student compacts.

**Finding 7:** The district did not provide evidence that its Title I schools convened annual Title I parent meetings that met the legislative requirements. Not conducting an annual meeting at the beginning of the year to explain the Title I legislation and the district's Title I programs at each school did not allow parents of identified Title I students to be informed and vested in the Title I process from the start.

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

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

**Finding 8:** On the FY 2014-2015 ESEA-NCLB Application in Step One of the Title I eligibility tab, the district included nonpublic enrollment counts and zero low-income counts for only the

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nonpublic schools within its attendance area. The district did not provide evidence to support zero nonpublic low-income counts and did not conduct outreach to nonpublic schools within a 25 mile radius that enroll district resident students. As such, the district did not generate funds to provide equitable services to resident nonpublic school students.

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

**Required Action:** The district must contact the nonpublic schools outside the attendance area that enroll district residents to generate low-income nonpublic student counts through the Nonpublic School Survey. The district must amend its FY 2014-2015 ESEA-NCLB Consolidated Application to include the nonpublic enrollment and nonpublic low-income counts for resident students enrolled in nonpublic schools outside the attendance area. In addition, the district must contact those nonpublic schools and begin the consultation process to identify eligible Title I students and to develop a service delivery plan. The district must send documentation of the consultation process (e.g., invitational letters, agendas, meeting notes, sign in sheets) to the NJDOE for review. The district must carry over any Title I funds generated for equitable services in the revised FY 2014-2015 Title I, Part A application to augment FY 2015-2016 Title I funds generated for equitable services.

**Finding 9:** The district's use of FY 2014-2015 Title I funds to purchase classroom furniture (\$1,696.25) supplanted local/state funding and as such, this expenditure was deemed unallowable.

**Citation:** ESEA §1120A(b): *Fiscal Requirements (Federal Funds to Supplement, Not Supplant, Non-Federal Funds).*

**Required Action:** The district must reverse the Title I expenditure for the classroom furniture and allocate state/local funds for those costs. The district must provide evidence of the journal entry to reverse the expenditures to the NJDOE for review.

**Finding 10:** The district's use of \$17,500 of FY 2014-2015 Title I funding for Tamka Educational Products, LLC to provide professional and technical services to Title I and non-Title I served schools supplanted state/local funds. Title I funding can only be used to benefit Title I students and staff in Title I served schools;

**Citation:** ESEA §1120A(b): *Fiscal Requirements (Federal Funds to Supplement, Not Supplant, Non-Federal Funds).*

**Required Action:** The district must reverse any Title I expenditures for Tamka Educational Products, LLC and allocate state/local funds for those costs. The district must provide evidence of the journal entry to reverse the expenditures to the NJDOE for review.



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**Title II**

**Finding 11:** The sampling of five instructional staff found two teachers did not meet requirements for classification as a highly qualified teacher. To meet the legislative definition of “highly qualified,” the teacher would have to possess the content certification for the core academic subject he/she currently teaches.

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

**Required Action:** The district must ensure these teachers are assigned to instructional positions for which they meet the highly qualified designation. The district must provide the NJDOE with revised teachers’ schedules for the 2014-2015 school year.

**Title III**

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

**Title III Immigrant**

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

**IDEA (Special Education)**

**Finding 12:** The district did not conduct meetings within 20 calendar days of receipt of a written request for a speech-language evaluation to determine if an evaluation was warranted.

**Citation:** N.J.A.C. 6A:14-3.3(e) and (d)5.

**Required Action:** The district must ensure a meeting is conducted within 20 calendar days of receipt of a written request for evaluation to determine if an evaluation is warranted. In order to demonstrate correction of noncompliance, the district must conduct training for speech-language specialists and develop an oversight mechanism to ensure compliance with the requirements in the citation listed above. A monitor from the NJDOE will conduct an on-site visit to interview staff, review the dated initial request for evaluation from the resulting meetings conducted between September 2015 and November 2015, and to review the oversight procedures.

**Finding 13:** The district did not consistently conduct all required sections of the functional assessment as a component of initial evaluations 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)(4) and (5); and 34 CFR §300.306(c)(i).

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**Required Action:** The district must ensure all components of the functional assessment are conducted as part of all initial evaluations. In order to demonstrate correction of noncompliance, the district must conduct training for speech-language specialists and develop an oversight mechanism to ensure compliance with the requirements in the citation listed above. Monitors from the NJDOE will conduct an on-site visit to interview staff, review initial evaluation reports for students evaluated between September 2015 and November 2015, and to review the oversight procedures.

**Finding 14:** The district did not consistently conduct multidisciplinary initial evaluations for students referred for special education and related services by conducting evaluations by a minimum of two child study team members.

**Citation:** N.J.A.C. 6A:14-2.5(b)6 and 3.4(g)3.

**Required Action:** A minimum of two child study team members must conduct evaluations for students referred for special education and related services to ensure a multidisciplinary evaluation is conducted. In order to demonstrate correction of noncompliance, the district must conduct training for child study team members and develop an oversight mechanism to ensure compliance with the requirements in the citation listed above. A monitor from the NJDOE will conduct an on-site visit to interview staff, review initial evaluation reports for students referred for special education and related services whose eligibility meetings were held between September 2015 and November 2015, and to review the oversight procedures.

**Finding 15:** 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 consideration of placement in the least restrictive environment. IEPs did not consistently include:

- comparison of the benefits provided in the regular class and the benefits provided in the special education class; and
- the potentially beneficial or harmful effects which a placement in general education may have on the students with disabilities or other students in the class.

**Citation:** N.J.A.C. 6A:14-4.2 (a)8(ii and iii).

**Required Action:** The district must ensure when determining the educational placement of a child with a disability, the IEP team considers the general education class first and that all required decisions regarding the placement are documented in the IEP for each student removed from general education for more than 20 percent of the school day. 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 specific students whose IEPs were identified as noncompliant. A monitor from the NJDOE will conduct an on-site visit to interview

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staff, review the 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 16:** The district did not consistently include required considerations and statements in each IEP for students eligible for special education and related services and for students eligible for speech-language services. Specifically, IEPs did not contain:

- strengths of the student;
- accommodations and modifications provided for district wide assessments; and
- a statement of how students' parents will be regularly informed of progress toward annual goals and objectives.

**Citation:** N.J.A.C. 6A:14-3.7(c)1 and (7) and (16); 20 U.S.C. §1414(d)(3)(A)(B); and 34 CFR §300.324(a)(1)(2).

**Required Action:** The district must ensure each IEP contains the required considerations and statements. In order to demonstrate correction of noncompliance, the district must conduct training for child study team members and speech-language specialists and develop an oversight mechanism to ensure compliance with the requirements in the citations listed above. To demonstrate the district has corrected the individual instances of noncompliance, the district must conduct annual review meetings and revise the IEPs for specific students whose IEPs were identified as noncompliant. A monitor from the NJDOE will conduct an on-site visit to interview staff, review the revised IEPs along with a random sample of IEPs developed between September 2015 and 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 17:** The district did not consistently provide to students eligible for special education and related services written notice of graduation and the summary of academic achievement and functional performance prior to graduating or exiting.

**Citation:** N.J.A.C. 6A:14-4.11(b)1-3; 20 U.S.C. §1414(c)(5)(B); and 34 CFR §300.305(e)(3).

**Required Action:** The district must ensure written notice of graduation and a summary of academic achievement and functional performance is provided to parents or adult students prior to graduating or exiting. In order to demonstrate correction of noncompliance, the district must conduct training for child study team members and develop an oversight mechanism to ensure compliance with the requirements in the citation listed above. A monitor from the NJDOE will conduct an on-site visit to interview staff, review copies of notice of graduation and the summary of academic

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achievement and functional performance provided to students graduating or exiting at the conclusion of the 2015-2016 school year, and to review the oversight procedures.

**Finding 18:** The district does not have a policy for the provision of accommodations and modifications or, when appropriate, an alternate assessment for students with disabilities participating in district wide assessments.

**Citation:** 34 CFR §300.160.

**Required Action:** The district must revise policies and procedures to ensure that students with disabilities participate in district wide assessment and that each IEP contains a statement of any individual modifications to be provided to the student in the administration of district-wide assessments. The policy must include the provision of accommodations and modifications and the provision of alternate assessments for those children who cannot participate in the regular assessment. If the district reports publicly on the district wide assessment, the district must also report with the same frequency and in the same detail as it reports on the assessment of nondisabled children. In order to demonstrate correction of noncompliance, the district must conduct training for child study team members regarding the procedures for implementing the requirements in the citation listed above. In addition, a monitor from the NJDOE will conduct an on-site visit to review the policy and IEPs developed between September 2015 and November 2015.

**Carl D. Perkins**

**Finding 19:** The district did not provide a copy of a signed articulation agreement for the automotive CTE program of study.

**Citation:** Perkins §135(b)1-9(2).

**Required Action:** The district must ensure they have a signed and dated articulation agreement on file for all CTE programs of study. The agreement must be signed annually by the district superintendent and college president.

**Finding 20:** The district did not conduct evaluations of CTE programs and review CTE student performance data annually.

**Citation:** Perkins §135(b)1-9(6).

**Required Action:** The district must ensure that program data is reviewed annually and CTE program performance is evaluated annually based on the review of relevant CTE program data. Evidence that a review and evaluation was conducted must be maintained by the district for monitoring purposes.

**Finding 21:** The district did not provide evidence that any materials and/or procedures to increase and support nontraditional student participation were developed and implemented.

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**Citation:** Perkins §134 (b) 8 (A), (B) & (C); 135(b)1-9.

**Required Action:** The district must conduct activities or implement strategies to increase participation and success of nontraditional students and other special population students in CTE programs. The district is advised to contact its Perkins Program officer for resources and assistance with developing appropriate strategies.

**Finding 22:** The district did not hold a minimum of two CTE advisory board meetings during the project period to ensure stakeholder input in development and implementation of CTE programs, as well as the use of Perkins Grant funding.

**Citation:** Perkins Act §134(b)(5) and N.J.A.C. 6A:19-3.1.

**Required Action:** The district must ensure that at least two advisory board meetings are held during the project period for each approved CTE program. The advisory boards must include the required membership as indicated in the New Jersey Administrative Code listed above. The district must maintain evidence that meetings took place including sign in sheets indicating the name, organizational affiliation of each member and including signatures of those in attendance at the meetings.

**Finding 23:** The district did not provide evidence of having consulted with their local Workforce Investment Board (WIB) regarding the development of the 2015 Perkins grant application.

**Citation:** Perkins Act §134(b)(5).

**Required Action:** The district must ensure there is consultation with their local WIB on the development of their annual Perkins Grant Application. The district must maintain documentation of evidence of consultation for monitoring purposes.

**Finding 24:** The district did not provide sign in sheets and other evidence confirming CTE teacher participation in professional development.

**Citation:** Perkins Act §134(b)4 and 135(b)5.

**Required Action:** The district must ensure that completed sign in sheets, as well as agendas are maintained for any professional development activities supported by Perkins grant funds.

**Finding 25:** The district did not have a CTE Safety and Health Plan.

**Citation:** N.J.A.C. 6A:19-6.4.

**Required Action:** The district must immediately develop a CTE Health and Safety plan. The district's plan must be adopted by the school board and submitted to the New Jersey Safe Schools Center for School and Community Based Research and Education, Attn: Dr. Derek

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Shendell, 335 George St., New Brunswick, NJ 08901 for review. The district is urged to contact Dr. Shendell for assistance in developing the CTE Health and Safety Plan.

**Finding 26:** The district did not inventory equipment purchased with Perkins grant funds.

**Citation:** EDGAR 200.313 (a) (c) (4) (1) and (2).

**Required Action:** The district must implement a control system to ensure adequate safeguards to prevent loss, damage, or theft of the federally funded equipment. The district must ensure that a property/equipment record for each item is maintained, and that each record includes the description, serial number, funding source acquisition cost, percentage of cost funded by federal funds, location and date of acquisition. Additionally, a physical inventory of the property must be taken and the results reconciled with the property records.

**Administrative**

**Finding 27:** On several occasions, the district failed to issue a purchase order prior to goods being purchased or services being rendered (confirming order). District policy and state regulations require that a properly executed purchase order be issued prior to the purchase of goods or the rendering of services.

**Citation:** EDGAR, PART 80-*Uniform Administrative Requirements for Grants and Cooperative Agreements to State and Local Governments*, Section 20, Standards for financial management systems. N.J.S.A. 18A:18A(2)(v) Public School Contracts Law.

**Required Action:** Purchase orders should be issued to all vendors prior to goods or services being provided.

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

If you have any questions, please contact Steven Hoffmann via phone at (973) 621-2750 or via email at [steven.hoffmann@doe.state.nj.us](mailto:steven.hoffmann@doe.state.nj.us).