



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 25, 2016

Mr. Paul Spaventa, Interim Superintendent  
Atlantic City Public Schools  
1300 Atlantic Avenue, 5<sup>th</sup> Floor  
Atlantic City, NJ 08401

Dear Mr. Spaventa:

The New Jersey Department of Education has completed a review of funds received and disbursed from one or more federal programs by the **Atlantic City Public Schools**. 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 April 22, 2016. 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/compliance/monitor/](http://www.state.nj.us/education/compliance/monitor/).

Utilizing the process outlined in the attached "Procedures for LEA/Agency Response, Corrective Action Plan and Appeal Process," the Atlantic City Public Schools 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) 984-5909.

Sincerely,

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

RJC/CS/dk:Atlantic City Public Schools Cover Letter /consolidated monitoring 15-16  
Enclosures

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

**ATLANTIC CITY SCHOOL DISTRICT**  
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ATLANTIC CITY, NJ 08401  
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*New Jersey K-12 Education*

**CONSOLIDATED MONITORING REPORT  
JULY 2016**

**District:** Atlantic City School District  
**County:** Atlantic  
**Dates On-Site:** April 18, 19, 20, and 22, 2016  
**Case #:** CM- 003-15

**FUNDING SOURCES**

Program	Funding Award
Title I, Part A	\$ 4,351,700
Title II, Part A	651,666
Title III	280,526
Carl D. Perkins	107,462
IDEA Basic	1,896,472
IDEA Preschool	38,880
	<hr/>
Total Funds	<u>\$ 7,326,706</u>

**ATLANTIC CITY SCHOOL DISTRICT  
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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 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 Atlantic City School District to monitor the district's use of federal funds and the related program plans, where applicable, to determine whether the schools' 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); Carl D. Perkins (Perkins); IDEA Basic and Preschool for the period July 1, 2014 through April 22, 2016.

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 reviewed included Title I, Title II, Title III, Carl D. Perkins and IDEA Basic and Preschool from July 1, 2014 through April 22, 2016. 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, CARL D. PERKINS  
AND IDEA FUNDS**

**Title I**

The district used its FY 2015-2016 Title I funds to implement a targeted assistance program in one elementary school, and schoolwide programs in the other 10 schools. Primarily, the district provides supplemental instructional opportunities through extended day and extended year programs. The district is also using Title I funds to support increased use of technology.

**Title II**

The district used its FY 2015-2016 Title II funds to provide professional development in the content areas of reading, writing, and mathematics.

**Title III**

The district used its FY 2015-2016 funds for English language learners (ELL), professional development, instructional materials, and teacher salaries. The district has approximately 1,050 ELLs in bilingual, sheltered English instruction, and English as a Second Language programs.

**Carl D. Perkins**

The Perkins grant funds provided support for the seven Career and Technical Education (CTE) programs operated by the district: Mechanical Drafting and Mechanical Drafting CAD/CADD (151306); Graphic Communications (100301); Radio and Television (090701); Radio and Television Broadcasting Technology/Technician (100202); Accounting Technology/Technician & Bookkeeping (520302); Cooking & Related Culinary Arts (120500); and Apparel & Textiles (190901).

**IDEA (Special Education)**

The district used its FY 2015-2016 IDEA Basic and Preschool funds for extended school year, summer evaluations, consultants for behavioral services and professional development. The district allocates funds for Coordinated Early Intervening Services to fund two Early Intervention Teachers working with identified at-risk students in the area of Literacy/Language Art and Mathematics. The district has allocated the nonpublic proportionate share for an instructional aide at Our Lady of the Sea. The remaining funds are used to reduce district tuition costs for students receiving special educational services in other public school districts and approved private schools for students with disabilities.

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**DETAILED FINDINGS AND RECOMMENDATIONS**

**Title I**

**Finding 1:** The district's Title I parental notification letter did not include the multiple, educationally related, objective entrance and exit criteria used for Title I student identification in a targeted assistance program. This information is necessary for parents to understand the reasons their child was selected to participate in the Title I program and what is needed for their child to exit the program.

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

**Required Action:** The district must revise its Title I participation letter to include the multiple, educationally related, objective criteria used to identify students for Title I services, and the criteria used to exit students from the Title I program. The school must provide a copy of its revised FY 2016-2017 Title I participation letter to the NJDOE for review.

**Finding 2:** The district did not provide school-level Title I parental involvement policies for each of its schools.

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

**Required Action:** The district should provide technical assistance to its Title I served schools in the development of a school-level parental involvement policy and ensure each school works with their stakeholder groups to develop the policy and review it annually. The district must submit copies of the FY 2016-2017 school-level policies to the NJDOE for review. The district must also submit evidence of engaging parents in the development and review of the policies (e.g., meeting invitations/flyers; meeting agendas, sign in sheets, and minutes).

**Finding 3:** The district's School Improvement Plan (SIP) for the Atlantic City High School that serves as its Schoolwide Plan under ESEA §1114(b) did not include all the school-level expenditures. Specifically, the Plan did not reflect the need for the expenditure of computers totaling \$132,838.

**Citation:** ESEA §1114: *Schoolwide Programs*.

**Required Action:** The district should update the SIP/schoolwide plan for Atlantic City High School to include the need justifying the use of Title I funds to purchase the computers.

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**Title II**

**Finding 4:** The district and schools do not have professional development plans. All schools and districts in New Jersey are required to create an annual district professional development plan and all schools are required to create a school-level professional development plan. 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 and the New Jersey Standards for Professional learning.

**Citations:** ESEA §2122: *Local Applications and Needs Assessment* and N.J.A.C. 6A:9C-4.2: District – school-level plans for professional development implementation.

**Required Action:** The district and schools must create professional development plans for the 2016-2017 school year that are consistent with professional development funded activities. The district and schools must submit the professional development plans to the NJDOE for review.

**Finding 5:** The district's use of Title IIA funds totaling \$256,559.64 to pay for the salaries and benefits for a second grade teacher at Brighton Elementary School, a first grade teacher at Uptown Elementary School, and a Kindergarten teacher at Richmond Elementary School teachers to reduce class sizes supplants local funding sources because the student teacher ratio does meet New Jersey Administrative Code for school districts with poverty levels of greater than 40 percent.

**Citation:** ESEA §2123(b): *Local Use of Funds (Supplement, Not Supplant)*; 2 CFR §200.403: Basic Considerations (Factors affecting allowability of costs); N.J.A.C. 6A: 32-8.3.

**Required Action:** The district must reverse all charges and submit the adjusting entry to the NJDOE. The district must allocate the appropriate staff for each grade level according to New Jersey Administrative Code for the 2016-2017 school year. A copy of teacher grade level assignment and student enrollment for each school must be submitted to the NJDOE for review.

**Finding 6:** The district's use of Title IIA funds totaling \$9,500.00 on purchase order 16-00968 to provide professional development for administrators on maintaining a district seniority list by Califon consultants, is not an allowable use of Title IIA funds.

**Citation:** ESEA §2122(b)(1)(B)(5): *Local Applications and Needs Assessment*; 2 CFR §200.403: Basic Considerations (Factors affecting allowability of costs).

**Required Action:** The district must reverse the charge and submit the adjusting entry to NJDOE.

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**Title III**

**Finding 7:** The district did not formalize the appropriate ELL entry criteria for the gifted and talented program. Although informal alternate criteria may be used to ensure ELLs' access to gifted and talented programs, no formal documentation exists in the district's selection criteria document. Selection criteria that allow for instructional methodology proven to be effective for ELLs must be provided to support the full range of academic offerings available to qualifying ELLs. The current selection criteria are ineffective because they may restrict ELLs' opportunities to access the district's gifted and talented program.

**Citation:** ESEA §3115(c): *Subgrants to Eligible Entities.*

**Required Action:** The district must document alternate gifted and talented selection criteria for ELLs to ensure access to gifted and talented programs. These criteria may include alternate entrance scores for students based on performance on the ACCESS for ELLs assessment, native language indicators, and other alternative measures. Alternate gifted and talented selection criteria must then be submitted to the NJDOE for review and approval once they are established.

**Finding 8:** The district has not developed recommendation forms for limited English proficient (LEP) parents in their native language for the gifted and talented program. Although LEP parents may have been consulted regarding recommendations for the gifted and talented programs, no formal native language parent recommendation form is available. Selection criteria that allow for instructional methodology proven to be effective for ELLs must be provided to support the full range of academic offerings available to qualifying ELLs. The current selection criteria documents are ineffective since they may restrict ELLs and other students opportunities to access the district's gifted and talented program.

**Citation:** ESEA §3115(c): *Subgrants to Eligible Entities.*

**Required Action:** The district must document alternate gifted and talented native language recommendation forms for LEP parents to ensure access to gifted and talented programs. These native language forms must be developed, disseminated to LEP parents as appropriate, and submitted to the NJDOE for review and approval once they are established.

**Finding 9:** The district did not receive Title III Immigrant funds in FY 2016, but the enrollment data submitted was inaccurate. Although the district included students who were not born in the United States (U.S.) and had been in a U.S. school for less than three years, it also included many students who had been in a U.S. school for more than three years. The inaccurate identification of students as immigrants limits students who do meet the federal definition of immigrant from accessing needed services.

**Citation:** ESEA §3301(6): *Reporting of Immigrant Youth.*



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**Required Action:** The district must submit a revised October 15, 2015 immigrant list of public and nonpublic students to the NJDOE for review. This list must include student identification (for public school students), U.S. entry date, first entry into U.S. school, and district/nonpublic school entry date for all immigrant students. The district must also submit a list of all ineligible students originally counted as immigrant students that includes student identification (for public school students), U.S. entry date, first entry into U. S. school, and district/nonpublic school entry date.

**Finding 10:** Teachers of ELLs did not have access to an English as a Second Language (ESL) curriculum aligned to the World Class Instructional Design and Assessment (WIDA) standards. ESL curriculum must address the WIDA English language development standards, cross-reference the school district's content curriculum, and be adopted by the district board of education. The lack of an ESL curriculum aligned to the WIDA standards restricts ELLs' opportunities to access effective ESL instructional methodology.

**Citation:** ESEA §3115(c): *Subgrants to Eligible Entities.*

**Required Action:** The district must align the ESL curriculum to the WIDA standards for the 2016-2017 school year. This curriculum must address the WIDA English language development standards, cross reference the school district's content curriculum, and be adopted by the district board of education. The district must submit documentation of the curriculum development and adoption process to the NJDOE for review.

**Finding 11:** The use of Title III funds for non-ELL afterschool classes supplanted state/local funds. As the result of sampling time sheets, reviewers were able to determine the 4th and 6th grade afterschool program at Texas Avenue School contained non-ELLs. The district used Title III funds to provide afterschool programs for non-ELLs at multiple grade levels. This adversely impacts the use of Title III supplemental spending for programs and services to address the needs of ELLs.

**Citation:** ESEA §3115(g): *Subgrant to Eligible Entities (Supplement, Not Supplant).*

**Required Action:** The district must determine which schools/grade levels had non-ELL students enrolled in the Title III afterschool program. The district must then reverse the expenditure of Title III funds for those specific classes and use state/local funds instead. The district must submit documentation of the adjusting entries to the NJDOE for review.

**Finding 12:** Although former ELLs are a part of the overall data analysis at the district-level, there is no formal evaluation process for former ELLs who have been exited from the program for two years or less. The district did not meet the Title III requirement to monitor for two years the progress made by exited ELLs on content and achievement standards. The lack of a specific process for monitoring former ELLs limits the effectiveness of the district in providing appropriate services to former ELLs.

**Citation:** ESEA §3121 *Evaluations.*

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**Required Action:** The district must formalize a process memo for all district staff regarding former ELLs for two years after such children are no longer receiving services. The process memo must include criteria for performance evaluations, time lines, and the staff members responsible for such evaluations. The district must submit documentation of the process memo to the NJDOE for review.

**Carl D. Perkins**

**Finding 13:** The district expended FY 2015-2016 Perkins grant funds on Microsoft Office related software and books. This purchase was improperly charged to the Perkins grant without a reasonable connection to an approved CTE program.

The district purchased the following supplies and allocated the costs to the Perkins grant:

Purchase Order#	Date	Vendor	Description	Disallowed
16-01035	10/21/15	Pearson	Microsoft Office Publisher 2013 book and supporting materials to support the upgrade of Computer Lab	\$5,529.93

**Citation:** Perkins Act §135(b)(1): *Local Uses of Funds (Requirements for Uses of Funds)*

**Required Action:** The district must ensure Perkins grant funds are expended on approved programs and expenditures represent allocable program costs in accordance with the requirements at the Perkins Act and applicable regulations.

**Finding 14:** The district did not provide opportunities to participate in structured learning experiences (SLE) for all students enrolled in approved CTE programs.

**Citation:** Perkins Act §135(b)(3): *Local Uses of Funds (Requirements for Uses of Funds)*; and N.J.A.C. 6A:19-4: *Structured Learning Experiences*.

**Required Action:** The district must offer CTE students opportunities to explore all aspects of their career programs through participation in SLEs linked to the New Jersey Core Curriculum Content Standards in all approved CTE programs. The district should contact its Perkins program officer for technical assistance.

**Finding 15:** The district did not have a minimum of two advisory committee meetings for CTE advisory committees for each approved CTE program.

**Citation:** Perkins Act §134(b)(5): *Local Plan for Career and Technical Education Programs (Contents)*; and N.J.A.C. 6A:19-3.1: *Program Requirements*.

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

**Finding 16:** All CTE program curricula did not incorporate the New Jersey Core Curriculum Content Standards.

**Citation:** Perkins Act §134(b)(3): *Local Plan for Career and Technical Education Programs (Contents)*.

**Required Action:** The district must align their CTE curriculum to reflect the New Jersey Core Curriculum Content Standard Nine (Career Ready Practices and Standard 9.3, Career and Technical Education) and the curriculum must be board approved.

**Finding 17:** The district is not offering a coherent sequence of three courses for Accounting Technology/Technician and Bookkeeping (CIP Code 520302).

**Citation:** Perkins Act §122 (c)(1)(A): *State Plan (Plan Contents)* and N.J.A.C. 6A: 19-3.1: *Program Requirements*.

**Required Action:** The district must ensure a coherent sequences of at least three courses are offered for approved CTE programs supported with Perkins funding. The course sequence should consist of those courses identified in the approved reapproval application. The district must ensure courses required of all students in the district for high school graduation purposes are not included with the CTE courses for CTE program approval. Also, course sequence information should be available for students, teachers, guidance counselors, administrators and parents.

**Finding 18:** The district did not conduct evaluations of CTE programs and review CTE student performance data annually.

**Citation:** Perkins Act §135(b)(1-9): *Local Uses of Funds (Requirements for Uses of Funds)*.

**Required Action:** The district must ensure 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 19:** 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 Act §134(b)(8-10): *Local Plan for Career and Technical Education Programs (Contents)* and Perkins Act §135(b)(6) and 135(b)(9): *Local Use of Funds (Requirements for Use of Funds)*.

**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 20:** The district utilized Perkins funds to support a Financial Literacy course (Keys to Financial Success) in the Accounting Technology/Technician & Bookkeeping program (520302). Financial Literacy courses are not approved courses in a CTE program.

**Citation:** Perkins Act §135(b)(1): *Local Uses of Funds (Requirements for Uses of Funds)*.

**Required Action:** The district must ensure Perkins funds are not used to support courses required of all students in the district for high school graduation purposes such as Financial Literacy. The district must also ensure student enrollment in such Financial Literacy courses are not reported in the CTE submission in NJ SMART.

**IDEA (Special Education)**

**Finding 21:** The district did not consistently convene for identification and eligibility determination/IEP meetings with required participants for students referred and/or eligible for special education and related services and for students referred and/or eligible for speech-language services.

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

**Required Action:** The district must ensure meetings are conducted with required participants and documentation of attendance and/or written parental consent to excuse a member of the team is maintained in student files. 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 citation listed above. A monitor from the NJDOE will conduct an on-site visit to interview staff, review meeting documentation, including the sign in sheets, for meetings conducted between October 2016 and December 2016, and to review the oversight procedures.

**Finding 22:** 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:

- measurable annual goals and objectives for social studies, science and counseling; and

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- age 14 post-school transition components.

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:14-4.3.

**Required Action:** The district must ensure each IEP contains the required considerations and statements. In order to demonstrate correction of noncompliance, the district must conduct training for child study team members and speech-language specialists and develop an oversight mechanism to ensure compliance with the requirements in the citations listed above. In addition, to demonstrate correction of individual instances of noncompliance, the district must conduct annual review meetings and revise IEPs for the specific students whose IEPs were identified as noncompliant. A monitor from the NJDOE will conduct an on-site visit to interview staff, review the revised IEPs and a random sample of additional IEPs developed at meetings conducted between October 2016 and December 2016, and to review the oversight procedures. The names of the students whose IEPs were identified as noncompliance 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: <http://www.state.nj.us/education/specialed/form/>.

**Finding 23:** The district did not consistently maintain documentation of the 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).

**Required Action:** The district must ensure I&RS documentation includes the description, frequency, duration and effectiveness of the interventions provided in the general education setting. In order to demonstrate correction of noncompliance, the district must conduct training for members of the I&RS committee 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 October 2016 and December 2016, and to review the oversight procedures.

**Finding 24:** 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.

Evaluation reports for students referred for special education and related services did not include a structured observation in other than a testing setting.

Evaluation reports for students referred for speech-language services did not include:

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- structured observation in other than a testing setting;
- parent interview;
- review of developmental/educational history; and
- review of interventions.

**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 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 October 2016 and December 2016, 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: <http://www.state.nj.us/education/specialed/form/>.

**Finding 25:** 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), 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 the required participants are in attendance. In order to demonstrate correction of noncompliance, the district must conduct training for speech-language specialists and develop an oversight mechanism to ensure compliance with the requirements in the citations listed above. A monitor from the NJDOE will conduct an on-site visit to interview staff, review documentation from meetings conducted between October 2016 and December 2016, and to review the oversight procedures.

**Finding 26:** 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 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

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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 October 2016 and December 2016, and to review the oversight procedures.

**Finding 27:** 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 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 in an transition planning conference for early intervention referrals received between October 2016 and December 2016, and to review the oversight procedures.

**Finding 28:** The district did not consistently conduct reevaluations within three years of the previous classification date 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 reevaluations are conducted within required time lines. In order to demonstrate correction of noncompliance, the district must conduct training for speech-language specialists and develop an oversight mechanism to ensure compliance with the requirements in the citations listed above. A monitor from the NJDOE will conduct an on-site visit to interview staff, review time lines for students due for reevaluation between October 2016 and December 2016, and to review the oversight procedures.

### **Administrative**

**Finding 29:** Although the district provided documentation to support a number of payroll charges, the records do not comply with required timekeeping standards for federally funded grants. Employees whose salaries are paid 100 percent with grant funds must complete a semi-annual certification attesting to their performance of grant related duties. Employees whose salaries are partially paid with grant funds must complete monthly personal activity reports. The documentation must reflect what the staff is doing, when and where they are working and it must support their funded percentage. This documentation is necessary to ensure grant funded staff are actually performing grant related responsibilities.

**Citation:** 2 CFR §200.430(i): Compensation—personal services (Standards for Documentation of Personnel Expenses).

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**Required Action:** The district must identify staff members whose salaries are supported in whole or in part with grant funds and verify the time and activity of staff charged to the grant. The district must submit sample time sheets utilized during FY 2015-2016 to the NJDOE for review.

**Finding 30:** The district's written policies and procedures covering procurement and cash management functions were not consistently followed. Examples are as follows:

- Purchase orders missing the signature of the district authorized Purchasing Agent;
- Unsigned receiving copies of purchase orders; and
- Purchase order voucher copies not executed by vendor.

**Citation:** 2 CFR §200.302: Financial management and §200.318: General procurement standards. N.J.A.C. 6A:23A-6.6: Standard Operating Procedures for Business Functions.

**Required Action:** The district was unable to initially satisfy the functions noted given by the NJDOE regarding fiscal guidance relative to approval and payment of invoices, such as the signatures of the business administrator and vendor. The issues were subsequently resolved accordingly.

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) 984-5909 or via email at [carla.spates@doe.state.nj.us](mailto:carla.spates@doe.state.nj.us).