



State of New Jersey

DEPARTMENT OF EDUCATION

PO Box 500

TRENTON, NJ 08625-0500

CHRIS CHRISTIE
Governor

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Lt. Governor

DAVID C. HESPE
Commissioner

January 19, 2016

Mrs. Kerry Postma
Chief School Administrator
Edgewater Public Schools
251 Undercliff Avenue
Edgewater, NJ 07020

Dear Mrs. Postma:

The New Jersey Department of Education has completed a review of funds received and disbursed from one or more federal programs by the **Edgewater 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, 2014 through November 30, 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 Edgewater 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:Edgewater BOE CM Cover Letter
Enclosures

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New Jersey K-12 Education

**CONSOLIDATED MONITORING REPORT
JANUARY 2016**

District: Edgewater Public Schools
County: Bergen
Dates On-Site: December 1 and 2, 2015
Case #: CM-006-15

FUNDING SOURCES

Program	Funding Award
Title I, Part A	\$ 226,680
IDEA Basic	183,375
IDEA Preschool	7,074
Title II, Part A	20,170
Title III	16,731
Title III Immigrant	1,576
Total Funds	<u><u>\$ 455,606</u></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 and IDEA). 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 Edgewater 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 and IDEA Basic and Preschool for the period July 1, 2014 through November 30, 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 and IDEA Basic and Preschool from July 1, 2014 through November 30, 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 AND IDEA FUNDS

Title I Projects

The district is using its FY 2015-2016 Title I funds to implement targeted assistance programs in its schools. Primarily, the district provides supplemental instructional opportunities through pullout programs. Prior year funds were spent on similar programs.

IDEA Projects

The district utilized the FY 2014-2015 and FY 2015-2016 IDEA Basic and Preschool funds to reduce district tuition costs for students receiving special educational services in approved private schools for students with disabilities.

DETAILED FINDINGS AND RECOMMENDATIONS

Title I

Finding 1: For FY 2015-2016, the district did not develop and distribute the Title I participation letter stating both entrance and exit criteria, remediation and the option to opt-out to parents of participating Title I students. Without this information, parents are 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: The district has submitted a revised copy of the Title I participation letter that will be used for FY 2016-2017 to the NJDOE for review.

Finding 2: There was no evidence that the district's parental involvement policy was reviewed for the current school year. 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 Title I parents.

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

Required Action: The district must submit copies of a recent board approved FY 2015-2016 district parental involvement policy to the NJDOE for review. The district must also provide evidence of inclusion of the associated stakeholder groups in the development of the parental involvement policy, and evidence of the involvement of parents and families in the development and annual review process. The district must provide evidence to the NJDOE that the FY 2015-2016 parental involvement policy was developed with the input of the parents/guardians of Title I students.

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Finding 3: The district did not provide school-level Title I parental involvement policies for both 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 it annually. The district must submit copies of the FY 2015-2016 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 (meeting agendas, sign in sheets and minutes).

Finding 4: The district's Title I schools provide academic interventions through pullout programs. The removal of students from core courses creates increased gaps in the skills and knowledge of academically at-risk students.

Citation: ESEA §1115(c)(1)((C) *Targeted Assistance Programs, Components of a Targeted Assistance Program*; USDE Policy letter October 6, 2008.

Required Action: The district's Title I schools must give consideration to revising its Title I program to provide services to Title I students in language arts and mathematics that does not remove students from their core courses. Primary consideration should be given to providing extended learning time opportunities, such as before and afterschool, and summer programs.

Finding 5: The district could not provide evidence of holding consultation meetings with nonpublic schools that enroll resident students. Per the legislative requirement, the district must ensure that it performs its due diligence in meeting with the nonpublic school officials to ensure that eligible students from its attendance area receive appropriate Title I services. During the consultation meeting, the district must discuss the following items: collection of poverty data, student identification, and services for eligible students, parents, and teachers.

Citation: ESEA §1120 (b): *Participation of Children Enrolled in Private Schools*.

Required Action: The district has submitted notices of consultation meetings scheduled with nonpublic schools to the NJDOE for review. The district must retain signed/certified receipts of its correspondence to nonpublic schools, copies of Affirmation of Consultation signed by all consulted parties, and Refusal forms. The district must also provide copies of meeting agenda, minutes, and sign in sheets to the NJDOE for review.

Title II

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

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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 6: The district did not conduct meetings within 20 calendar days of receipt of a written request for evaluation for students referred for special education and related services.

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

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 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 documentation from identification meetings conducted between April 2016 and December 2016, and to review the oversight procedures.

Finding 7: The district did not consistently convene 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)1-2; 20 U.S.C. §1414(d)(1)(B); and 34 CFR §300.321(a).

Required Action: The district must ensure meetings are conducted with required participants and that documentation of participation is maintained in student records. In order to demonstrate correction of noncompliance, the district must conduct training for child study team members and speech-language specialists and develop an oversight 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 the sign in sheets, for meetings conducted between April 2016 and June 2016 and to review the oversight procedures.

Finding 8: The district did not consistently conduct all required sections of the functional assessment as a component of initial evaluations for students referred for special education and related services 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)(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 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 for students evaluated between April 2016 and June 2016 and to review the oversight procedures.

Finding 9: 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:

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

Citation: N.J.A.C. 6A:14-4.2 (a)8,(i-iii) and 3.7(k).

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 citation 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 with IEPs that were identified as noncompliant. A monitor from the NJDOE will conduct an on-site visit to interview staff, review the revised IEPs along with a random sample of additional IEPs developed at meetings conducted between April 2016 and June 2016 and to review the oversight procedures. The names of the students whose IEPs were identified as noncompliant will be provided to the district by the monitor.

Finding 10: 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 students with disabilities participate in district wide assessments and 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

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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.

Administrative

Finding 11: The district is charging Title III expenditures to the incorrect program code in the general ledger. Title III is being charged to program code 273; a code between 241 and 245 should be used for Title III.

Citation: Uniform Minimum Chart of Accounts for New Jersey Public Schools.

Required Action: The district must establish accounts using appropriate program codes in the general ledger.

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.