



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

April 8, 2016

Dr. Dennis Vespe, Superintendent
Somerdale School District
301 Grace Street
Somerdale, NJ 08083

Dear Dr. Vespe:

The New Jersey Department of Education has completed a review of funds received and disbursed from one or more federal programs by the **Somerdale School District**. The funding sources reviewed include titled programs for the Elementary and Secondary Education Act (ESEA) and the Individuals with Disabilities Education Act (IDEA). The review covered the period July 1, 2014 through January 15, 2015. The resulting report is enclosed. Please provide a copy of the report to each board member. All issued Consolidated Monitoring Reports will be posted on the department's website at www.state.nj.us/education/compliance/monitor/.

Utilizing the process outlined in the attached "Procedures for LEA/Agency Response, Corrective Action Plan and Appeal Process," the Somerdale School District is required, pursuant to N.J.A.C. 6A:23A-5.6, to publicly review and discuss the findings in this report at a public board meeting no later than 30 days after receipt of the report. Within 30 days of the public meeting, the board must adopt a resolution certifying that the findings were discussed in a public meeting and approving a corrective action plan which addresses the issues raised in the undisputed findings and/or an appeal of any **monetary** findings in dispute (emphasis added). A copy of the resolution and the approved corrective action plan and/or appeal must be sent to this office within 10 days of adoption by the board. Direct your response to my attention.

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

By copy of this report, your auditor is requested to comment on all areas of noncompliance and recommendations in the next certified audit submitted to the New Jersey Department of Education. If you have any questions, please contact Carla Spates at (609) 984-5909.

Sincerely,

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

RJC/CS/dk:Somerdale School District Cover Letter /consolidated monitoring 15-16
Enclosures

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**SOMERDALE PARK SCHOOL
301 GRACE STREET
SOMERDALE, NJ 08083
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New Jersey K-12 Education

**CONSOLIDATED MONITORING REPORT
APRIL 2016**

District: Somerdale Park School
County: Camden
Dates On-Site: February 10 and 11, 2016
Case #: CM-014-15

FUNDING SOURCES

Program	Funding Award
Title I, Part A	\$ 147,800
Title II, Part A	12,424
IDEA Basic	149,874
IDEA Preschool	3,954
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Total Funds	<hr/> \$ 314,052 <hr/>

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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 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 Somerdale Park School District to monitor the district's use of federal funds and the related program plans, where applicable, to determine whether the school'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); IDEA Basic and Preschool for the period July 1, 2014 through January 15, 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, and IDEA Basic and Preschool from July 1, 2014 through January 15, 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 AND IDEA FUNDS

Title I

The district is using its FY2015-2016 Title I funds to operate schoolwide programs in its one school. Primarily, the district provides supplemental instructional opportunities through in-class support, and extended year programs. The district is also using Title I funds to support increased use of technology and professional development.

Title II

The district is using its FY 2015-2016 Title II funds to implement a schoolwide program. Primarily, the school is using its allocation to support the salaries of the school principal and an academic interventionist who leads professional development for all teachers.

IDEA (Special Education)

The district is using its FY 2015-2016 IDEA Basic and Preschool funds to provide paraprofessional support for students with disabilities. In addition, the district is using funds to purchase equipment for special education classes and to renew database software to track and streamline student IEPs.

DETAILED FINDINGS AND RECOMMENDATIONS

Title I

Finding 1: The district did not provide evidence its Title I school convened an annual Title I parent meeting. In a Title I schoolwide program, all parents/guardians must be informed about the school's Title I program, legislative requirements, and how they can become actively engaged in helping their child/children succeed academically.

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

Required Actions: The district must convene its FY 2015-2016 annual Title I parent meeting and submit evidence of said meeting (e.g., invitational letter/flyer, agenda, meeting minutes, and sign in sheets) to the NJDOE for review.

Finding 2: The district did not disclose a competitive bid was funded with federal funds as required under the Steven's Amendment.

Citation: Public Law 100-463, Section 8136: Department of Defense Appropriations Act, Stevens Amendment.

Required Action: The district must develop procedures to disclose the inclusion of the

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Steven's Amendment in future bid packages. The school must send a copy of these procedures to the NJDOE for review.

Finding 3: The district did not properly procure services under the Uniform Guidance which requires purchases over \$3,000 (Simplified Acquisition Threshold) to have formal quotes or bids. The contracts for services with Curriculum Advantage and Northwest Evaluation Association exceeded the maximum allowable amount and needs to be formally quoted or bid.

Citation: 2 CFR§200.320: Methods of procurement.

Required Action: The district must begin the process of seeking formal quotes or bids for the services offered by Curriculum Advantage and Northwest Evaluation Association, or reverse the charges to these two vendors. The district must submit either documentation of its quote/bid process or the adjusting journal entry to the NJDOE for review.

Title II

Finding 4: The district's use of Title II funds to pay for the Welcome Back Faculty Breakfast in the amount of \$450.00 and the Teachers Christmas Breakfast in the amount of \$350.00 is unallowable under federal cost principles.

Citation: ESEA §2123(b): *Local Use of Funds (Supplement Not Supplant)*. 2 CFR §200.403: Basic Guidelines (Factors affecting allowability of costs).

Required Action: The district must reverse the charge for the unallowable expenditures and submit the adjusting entry showing the removal to the NJDOE for review.

IDEA PROGRAM

Finding 5: The district does not offer a full-continuum of placement options for students determined eligible for special education and related services. The district currently offers pull-out resource services for the majority of students. In-class resource is currently limited to preschool and Grade 2 but not considered for students at other grade levels. Students with disabilities in general education classroom settings in grades other than Grade 2 and preschool have the opportunity for aide support, but in-class resource is not an option.

Citation: 20 USC 1412(a)(5)(A); 34 CFR §300.114(a), N.J.A.C. 6A:14-4.2.

Required Action: The district must ensure all students who are eligible for special education and related services have the opportunity to participate in programs and services based on their individual needs in the least restrictive environment (LRE). The district must also ensure decisions regarding program placement are made on an individual basis. The district must develop a procedure to ensure placement in the LRE and individual decision making regarding program placement and provide training to child study team members and administrative staff on the newly developed procedures. A monitor from the NJDOE will

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conduct an on-site visit to interview staff, review the developed procedures, evidence of required training, and documentation of program placement decisions.

Finding 6: The district did not document all required considerations and statements in each IEP for students eligible for special education and related services. IEPs did not include:

- age 14 post-school transition components;
- all required goals and objectives for related services and academic subjects taught in a pull-out replacement setting; and
- an explanation of the extent, if any, that a student will not participate with nondisabled students in nonacademic and extra-curricular activities.

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).

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

Finding 7: 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 LRE. Specifically, IEPs did not consistently include:

- the supplementary aids and services considered, and/or an explanation of why they were rejected;
- a 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 (general education) may have on the student with disabilities or the other students in the class.

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

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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. 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 the district has corrected the individual instances of noncompliance, the district must conduct annual review meetings and revise the IEPs for the specific students 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 July 2016 and October 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 8: 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).

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

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.