

# State of New Jersey

Governor
KIM GUADAGNO
Lt. Governor

CHRIS CHRISTIE

DEPARTMENT OF EDUCATION PO Box 500 Trenton, NJ 08625-0500

KIMBERLEY HARRINGTON Acting Commissioner

November 18, 2016

Dr. Robert Gamper, Superintendent Park Ridge School District 85 Pascack Road Park Ridge, NJ 07656

Dear Dr. Gamper:

The New Jersey Department of Education has completed a review of funds received and disbursed from one or more federal programs by the <u>Park Ridge School District</u>. The funding source reviewed was the Individuals with Disabilities Education Act. The review covered the period July 1, 2015 through October 31, 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 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 Park Ridge 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 Steven Hoffmann at (973) 621-2750.

Sincerely,

Robert J. Cicchino, Director

Office of Fiscal Accountability and Compliance

RJC/SH/dk: Park Ridge School District CM Cover Letter

Enclosures

## **Distribution List**

Kimberley Harrington Robert Bumpus Susan Martz Anne Corwell John Worthington Kimberly Murray Michael Yaple Steven Hoffmann Norah Peck Stephen M. Eells

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

#### PARK RIDGE SCHOOL DISTRICT

85 PASCACK ROAD PARK RIDGE, NJ 07656 PHONE: (201) 573-6000



New Jersey K-12 Education

## CONSOLIDATED MONITORING REPORT NOVEMBER 2016

**District**: Park Ridge School District

County: Bergen

**Dates On-Site**: November 1, 2, 3, 2016

**Case #:** CM-004-16

#### **FUNDING SOURCES**

IDEA Basic		\$316,732
IDEA Preschool		20,811
	Total Funds	\$337,543

#### **BACKGROUND**

The Elementary and Secondary Education Act (ESEA) and the Individuals with Disabilities Act (IDEA) and other federal laws require that districts provide programs and services based on the requirements specified in each of the authorizing statutes (i.e., 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. Due to the impending implementation of new ESSA regulations, only IDEA and Special Education will be reviewed during consolidated monitoring.

#### **INTRODUCTION**

The NJDOE visited the Park Ridge School District 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: IDEA Basic and Preschool for the period July 1, 2015 through October 31, 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 district personnel, reviewed the supporting documentation for a sample of expenditures and conducted internal control reviews.

#### **EXPENDITURES REVIEWED**

The grants reviewed included IDEA Basic and Preschool from July 1, 2015 through October 31, 2016. A sampling of purchase orders and/or salaries was taken from each program reviewed.

#### GENERAL OVERVIEW OF USES OF IDEA FUNDS

#### **IDEA Projects**

The majority of the FY 2016 and 2017 IDEA Basic and Preschool funds are being 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.

#### **DETAILED FINDINGS AND RECOMMENDATIONS**

#### **IDEA (Special Education)**

**Finding 1:** The district did not consistently document the attendance of required participants during preschool transition planning meetings for students eligible for special education and related services and at identification, initial eligibility, IEP meetings, and reevaluation planning meetings 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(d)(1)(B); and 34 CFR §300.321(a).

**Required Action:** The district must ensure that all meetings are conducted with required participants and that documentation of attendance and/or written parental consent to excuse a member of the team is maintained in student's 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 March 2017 and May 2017, and to review the oversight procedures.

<u>Finding 2:</u> 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 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 March 2017 and May 2017, and to review the oversight procedures.

**Finding 3:** The district did not consistently conduct all required sections of the functional assessment as a component of an initial evaluation for students referred for speech-language services. Initial evaluation reports did not contain an observation in a non-testing setting, parental interviews, teacher interviews, a review of developmental/educational history, and a review of interventions documented by the teacher(s) or others who work with the student.

**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).

**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 citations listed above. For assistance with correction of noncompliance, the district is referred to the sample report form for speech-language evaluations which is located at: <a href="https://www.state.nj.us/education/specialed/forms">www.state.nj.us/education/specialed/forms</a>. Monitors from the NJDOE will conduct an on-site visit to interview staff, review initial evaluation reports for students evaluated between March 2017 and May 2017, and to review the oversight procedures.

**Finding 4:** 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:

- supplementary aids and services considered;
- an explanation of why the supplementary aids and services were rejected;
- comparison of the benefits provided in general education and the benefits provided in the special education class;
- 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; and
- for those students placed in separate settings, activities to transition the student to a less restrictive environment.

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

Required Action: The district must ensure that 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. The district must also ensure that for students placed in separate settings, the IEP team identifies activities to transition the student to a less restrictive environment and document them in each IEP. In order to demonstrate correction of noncompliance, the district must conduct training for child study team members and develop an oversight mechanism to ensure compliance with the requirements in the citations listed above. To demonstrate that the district has corrected the individual instances of noncompliance, the district must

conduct annual review meetings and revise the IEPs for 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 March 2017 and May 2017, 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 5:** The district did not consistently include required considerations and statements in each IEP for students eligible for special education and related services placed in out-of-district settings. IEPs did not contain:

- measureable annual goal(s) and objective(s); and
- a statement of how progress towards annual goals will be measured.

**Citation:** N.J.A.C. 6A:14-3.7(c)3,(e)3,7&8 and 4.3(c); and 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. To demonstrate the district has corrected the individual instances of noncompliance, the district must conduct annual review meetings and revise 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 March 2017 and May 2017, 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 Steven Hoffmann via phone at (973) 621-2750 or via email at steven.hoffmann@doe.state.nj.us.