



State of New Jersey  
DEPARTMENT OF EDUCATION  
PO Box 500  
TRENTON, NJ 08625-0500

CHRIS CHRISTIE  
Governor

KIM GUADAGNO  
Lt. Governor

KIMBERLEY HARRINGTON  
Acting Commissioner

January 19, 2017

Mr. James DiDonato, Superintendent  
Mount Holly Township Public Schools  
331 Levis Drive  
Mt. Holly, NJ 08060

Dear Mr. DiDonato:

The New Jersey Department of Education has completed a review of funds received and disbursed from one or more federal programs by the Mount Holly Township Public Schools. The funding source reviewed was the Individuals with Disabilities Education Act. The review covered the period July 1, 2015 through December 9, 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 Mount Holly Township 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 States at (609 984-5909).

Sincerely,

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

RJC/CS dk: Mount Holly Township Public Schools CM Cover Letter  
Enclosures

[www.nj.gov/education](http://www.nj.gov/education)

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

**MOUNT HOLLY TOWNSHIP PUBLIC SCHOOLS**

331 Levis Drive  
Mount Holly, NJ 08060  
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*New Jersey K-12 Education*

**CONSOLIDATED MONITORING REPORT  
JANUARY 2017**

**District:** Mount Holly Township Public Schools  
**County:** Burlington  
**Dates On-Site:** December 7, 8, and 9, 2016  
**Case #:** CM- 010 -16

**FUNDING SOURCES**

Program	Funding Award
IDEA Basic	\$ 375,443
IDEA Preschool	10,855
Total Funds	<u>\$ 386,298</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 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 Every Student Succeeds Act (ESSA) regulations, only IDEA and Special Education will be reviewed during consolidated monitoring.

**INTRODUCTION**

The NJDOE visited the Mount Holly 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 IDEA Basic, IDEA Preschool, and Special Education programs for the period July 1, 2015 through December 9, 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, and current district policies and procedures. The monitoring team members reviewed the supporting documentation for a sample of expenditures and conducted internal control reviews, as well as, interviews with program administrators and other district personnel as required. Additionally, the IDEA grants review included 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, and interviews of child study team members and speech-language specialists.

**EXPENDITURES REVIEWED**

The IDEA Basic and Preschool grant reviews included a sampling of purchase orders taken from the entire population and later identified as to the IDEA grant for the period July 1, 2015 through December 9, 2016.

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**GENERAL DISTRICT OVERVIEW OF USES OF IDEA GRANT FUNDS**

**IDEA Projects**

The FY 2017 IDEA Basic funds are being used to reduce district tuition expenditures for students receiving special educational services in private schools for students with disabilities.

**DETAILED FINDINGS AND RECOMMENDATIONS**

**IDEA**

A review of the expenditures charged to the IDEA grants yielded no findings.

**IDEA (Special Education)**

**Finding 1:** The district did not conduct meetings within 20 calendar days of receipt of a written request for a child study evaluation or 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 that required participants are in attendance. 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 documentation from meetings conducted between February 2017 and September 2017, and to review the oversight procedures.

**Finding 2:** The district did not consistently follow appropriate procedures to evaluate students referred for a speech-language evaluation. Speech-language specialists conducted screenings of individual students to determine if an evaluation was warranted prior to initiating the formal referral process.

**Citation:** N.J.A.C. 6A:14-3.3(e), 3.4(j).

**Required Action:** The district must discontinue the practice of screening individual students prior to initiating the evaluation process. 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 identification meetings conducted between February 2017 and September 2017, and to review the oversight procedures.

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**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 special education and related services. Specifically, evaluation reports did not consistently include an observation of the student in other than a testing setting and an interview with parents.

**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 all initial evaluations. 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 evaluated between February 2017 and September 2017, and to review the oversight procedures.

**Finding 4:** 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 February 2017 and September 2017, and to review the oversight procedures.

**Finding 5:** The district did not document all required considerations and statements in each IEP for students eligible for special education and related services and for students eligible for speech-language services.

IEPs for students eligible for special education and related services did not include:

- measurable annual goals and objectives;
- criteria for mastering goals and objectives and how progress toward goals will be measured;
- location of services; and
- age 14 post-school transition components.

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IEPs for students eligible for speech-language services did not include:

- a statement on how progress towards annual goals will be measured.

**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 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 February 2017 and September 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. 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](http://www.statenj.us/education/specialed/forms).

**Finding 6:** The district did not consistently document the following in the IEPs of students removed from the general education setting for more than 20 percent of the day, including students placed in separate settings, consideration of placement in the least restrictive environment. Specifically, IEPs did not consistently include:

- comparison of the benefits provided in the regular class and the benefits provided in the special education 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(i),(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 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 that were identified as noncompliant. A monitor from the NJDOE will conduct an on-site visit to interview staff, review revised IEPs, review a random sample of additional IEPs developed at meetings conducted between February 2017 and September 2017, and to review the oversight procedures. The

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names of the students whose IEPs were identified as noncompliant will be provided to the district by the monitor.

**Finding 7:** The district did not consistently ensure the required participants were in attendance at identification, IEP and eligibility meetings for student's eligible special education and related services and for students 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 is maintained in the file. In addition, prior written parental consent of the meeting 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 February 2017 and September 2017, and to review the oversight procedures.

**Finding 8:** The district did not consistently conduct reevaluations within three years of the previous classification date for students eligible for special education and related services. Additionally the district did not complete all components of the reevaluation process within 60 days of the date the parent provided written parental consent.

**Citation:** N.J.A.C. 6A: 14-3.8(a) and U.S.C. §1414(a)(2).

**Required Action:** The district must ensure reevaluations are conducted within required timelines with required participants in attendance. 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 requirements in the citation listed above. A monitor from the NJDOE will conduct an on-site visit to interview staff, review documentation of eligibility meetings held as part of the reevaluation process between February 2017 and September 2017, and to review the oversight procedures.

**Finding 9:** 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;20U.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 demonstrating



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participation of a child study team member in the transition planning conference conducted between February 2017 and September 2017 for students transitioning from early intervention to preschool, 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](mailto:carla.spates@doe.state.nj.us).