



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

March 17, 2017

Mr. Joseph Rafferty, Superintendent
Gloucester City Public Schools
50 Cumberland Street
Gloucester City, NJ 08030

Dear Mr. Rafferty:

The New Jersey Department of Education has completed a review of funds received and disbursed from one or more federal programs by the **Gloucester City Public Schools**. The funding source reviewed was the Individuals with Disabilities Education Act. The review covered the period July 1, 2015 through March 1, 2017. 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 Gloucester 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 States at (609 984-5909).

Sincerely,

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

RJC/CS/dk: Gloucester City Public Schools CM Cover Letter
Enclosures

www.nj.gov/education

Distribution List

Kimberley Harrington
Robert Bumpus
Susan Martz
Anne Corwell
John Worthington
Kimberly Murray
Michael Yaple
Carla Spates
Lovell Pugh-Bassett
Stephen M. Eells

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

**GLOUCESTER CITY PUBLIC SCHOOLS
520 CUMBERLAND STREET
GLOUCESTER CITY, NJ 08030
PHONE: (856) 456-7000**



New Jersey K-12 Education

**CONSOLIDATED MONITORING REPORT
MARCH 2017**

District: Gloucester City Public Schools
County: Camden
Dates On-Site: February 27, 28 and March 1, 2017
Case #: CM - 015 - 16

FUNDING SOURCES

Program	Funding Award
IDEA Basic	\$ 692,114
IDEA Preschool	24,154
Total Funds	<u>\$ 716,268</u>

**GLOUCESTER CITY PUBLIC SCHOOLS
CONSOLIDATED MONITORING REPORT
MARCH 2017**

BACKGROUND

The Elementary and Secondary Education Act (ESEA) and the Individuals with Disabilities Act (IDEA) and other federal laws require 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 will be reviewed during consolidated monitoring.

INTRODUCTION

The NJDOE visited the Gloucester City 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 and Preschool programs for the period July 1, 2015, through March 1, 2017.

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 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 documentation for a sample of expenditures and conducted internal control reviews.

EXPENDITURES REVIEWED

The FY 2016-2017 IDEA Basic and Preschool grants were reviewed from July 1, 2015, through March 1, 2017. A sampling of purchase orders and/or salaries was taken from each program reviewed.

**GLOUCESTER CITY PUBLIC SCHOOLS
CONSOLIDATED MONITORING REPORT
MARCH 2017**

GENERAL DISTRICT OVERVIEW OF USES OF IDEA GRANT FUNDS

IDEA Projects (Special Education)

The majority of FY 2016-2017 IDEA Basic funds are being used to reduce tuition costs for students receiving special education and related services in other public school districts and approved private schools for students with disabilities. In addition, funds are used for the salary and benefits of a secretary in special services, consultation services provided to teachers of students with disabilities in nonpublic settings, instructional materials and software licenses. Preschool funds are being used for instructional supplies.

DETAILED FINDINGS AND RECOMMENDATIONS

IDEA (Special Education)

Finding 1: The district included students' names on purchase orders for students educated in tuition placements; therefore, violating student confidentiality.

Citation: 34 §CFR 99 and N.J.A.C. 6A:32-7.

Required Action: The district must revise procedures to ensure confidentiality of student information is maintained and only persons having educational responsibility for those students have access to this information. Revised procedures must be submitted to the NJDOE for review.

Finding 2: The district provides a language arts teacher and a mathematics teacher for in-class resource to nonpublic students at Gloucester Catholic High School, but these services are not included on the Individual Student Plans (ISPs) of students receiving these services. A requirement of the IDEA grant is that ISPs of students must identify services provided with IDEA funds.

Citation: 34 CFR §300.130, 144 and 300.

Required Action: The services listed in the ISPs to be provided through the IDEA grant need to match the services listed in the IDEA grant application. The provision of in-class resource provided by a language arts teacher or a mathematics teacher must be delineated in the ISPs. The district must develop procedures to ensure ISPs include services provided through IDEA funds and the next regularly scheduled annual review meetings must have the services documented in the ISPs.

Finding 3: The district did not consistently provide parents of students eligible for special education and related services, as well as, students eligible for speech-language services notice of a meeting for identification, eligibility and reevaluation planning meetings.

Citation: N.J.A.C. 6A:14-2.3(k); 20 U.S.C. §1414(b)(1); and 34 CFR §300.304(a).

**GLOUCESTER CITY PUBLIC SCHOOLS
CONSOLIDATED MONITORING REPORT
MARCH 2017**

Required Action: The district must ensure parents are provided notice of a meeting, containing all required components, early enough to ensure the parent has an opportunity to attend. 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 for meetings conducted between May 2017 and November 2017, and to review the oversight procedures.

Finding 4: The district did not provide to students eligible for special education and related services written notice of graduation within required timelines.

Citation: N.J.A.C. 6A:14-4.11(b).

Required Action: The district must ensure parents or adult students are provided with written notice of graduation containing all required components prior to graduation. 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 written notice of graduation provided to eligible students who will graduate at the conclusion of the current school year, and to review the oversight procedures.

Finding 5: The district did not provide a summary of academic achievement and functional performance prior to graduating and/or aging out to students eligible for special education and related services.

Citation: N.J.A.C. 6A:14-4.11(b)4; 20 U.S.C. §1414(c); and 34 CFR §300.305(e)(3).

Required Action: The district must ensure students are provided with their summary of academic achievement and functional performance prior to graduation that addresses all required components prior to graduation and/or exiting. 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 the summary of academic achievement and functional performance provided to eligible students at the conclusion of the current school year, and to review the oversight procedures.

Finding 6: The district did not document all required considerations and statements in each Individualized Education Program (IEP). IEPs for students eligible for special education and related services did not include measurable post-secondary goals based on age appropriate transition assessments.

**GLOUCESTER CITY PUBLIC SCHOOLS
CONSOLIDATED MONITORING REPORT
MARCH 2017**

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 IEPs, a random sample of additional IEPs developed at meetings conducted between May 2017 and November 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.state.nj.us/education/specialed/form.

Finding 7: The district did not consistently document in the IEPs of students who were removed from the general education setting for more than 20 percent of the school day, including student placed in separate settings, and consideration of placement in the least restrictive environment in the IEPs. Specifically, IEPs did not consistently include:

- a comparison of the benefits provided in the regular class and the benefits provided in the special education class;
- 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; 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); and N.J.A.C. 6A:14-4.2 (a)4.

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 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. The district must also ensure for students who are placed in separate settings, the IEP team identified 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 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 and review the following: revised IEPs, a random sample of additional IEPs developed at meetings conducted between May 2017 and November 2017, and to review the oversight

**GLOUCESTER CITY PUBLIC SCHOOLS
CONSOLIDATED MONITORING REPORT
MARCH 2017**

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 provide written invitations to meetings where post-school transition was being discussed to students beginning at age 14.

Citation: N.J.A.C. 6A:14-2.3(k)2x and 34 CFR §300.322.(b)(2).

Required Action: The district must ensure each student with an IEP age 14 or above is provided with a written invitation to any IEP meeting where transition to adult life will be discussed. 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 copies of invitations to IEP meetings to students age 14 and above for meetings conducted between May 2017 and November 2017, and to review the oversight procedures.

Finding 9: 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. Specifically, evaluation reports did not contain an observation of the student in other than a testing setting.

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 May 2017 and November 2017, and to review the oversight procedures.

Finding 10: 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

**GLOUCESTER CITY PUBLIC SCHOOLS
CONSOLIDATED MONITORING REPORT
MARCH 2017**

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 May 2017 and November 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 Carla Spates via phone at (609)984-5909 or via email at carla.spates@doe.state.nj.us.