



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

May 31, 2017

Dr. Charles Ford Jr., Chief School Administrator
Deptford Township School District
2022 Good Intent Road
Deptford, NJ 08096

Dear Dr. Ford:

The New Jersey Department of Education has completed a review of funds received and disbursed from one or more federal programs by the Deptford Township School District. The funding source reviewed was the Individuals with Disabilities Education Act. The review covered the period July 1, 2015 through April 12, 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/>.

All findings related to the special education program contain required action the LEA must undertake in order to demonstrate correction of noncompliance. In accordance with federal guidelines, LEAs have one year from the date of the report to correct any findings of noncompliance related to federal or state special education regulations. LEAs are not required to develop CAP activities to address these findings of noncompliance. The special education monitor will work directly with the LEA on activities to demonstrate correction.

Utilizing the process outlined in the attached "Procedures for LEA/Agency Response, Corrective Action Plan and Appeal Process," the Deptford Township 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:Deptford Twp. CM Cover Ltr.doc
Enclosures

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DEPTFORD TOWNSHIP SCHOOL DISTRICT
2022 GOOD INTENT ROAD
DEPTFORD, NJ 08096
PHONE: (856) 232-2700



New Jersey K-12 Education

**CONSOLIDATED MONITORING REPORT
MAY 2017**

District: Deptford Township School District
County: Gloucester
Dates On-Site: April 10, 2017
Case #: CM-025-16

FUNDING SOURCES

IDEA Basic		\$1,135,022
IDEA Preschool		35,587
	Total Funds	<u>\$1,170,609</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 Deptford Township 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 April 12, 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 grants reviewed included IDEA Basic and Preschool from July 1, 2015, through April 12, 2017. A sampling of purchase orders and/or salaries was taken from each program reviewed.

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GENERAL OVERVIEW OF USE OF IDEA FUNDS

IDEA

The majority of the FY 2016-2017 IDEA Basic and Preschool funds are being used to reduce district tuition costs for students receiving special education services in other public school districts and approved private schools for students with disabilities. In addition, the nonpublic proportionate share is allocated for a teacher assistant and related services for students with disabilities attending Holy Trinity Regional School.

DETAILED FINDINGS AND RECOMMENDATIONS

IDEA

A review of the expenditures charged to the IDEA grant did not yield any findings.

IDEA (Special Education)

Finding 1: The district did not document all required considerations and statements in each Individualized Education Program (IEP) for students eligible for special education and related services. The IEPs did not consistently include:

- required goals and objectives for all subjects where the student is removed from general education;
- a statement of student's interests, strengths and preferences, courses of study, the need for consultation with other agencies, and the needed interagency linkages for students aged 14 and older;
- age-appropriate transition assessments for students aged 16 and older;
- documentation of the relevant factors considered when determining the need for extended school year; and
- an explanation of the extent, if any, a student will not participate with nondisabled students in nonacademic and extracurricular 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 IEPs and a random sample of additional IEPs developed at meetings conducted between June 2017 and December 2017, and to review the oversight

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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 2: 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:

- for those students placed in separate settings, activities to transition the student to a less restrictive environment.
- the supplementary aids and services considered, and 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;
- the potentially beneficial and/or harmful effects of placement in general education on the student or other students in the class; and

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 the revised IEPs, along with a random sample of additional IEPs developed at meetings conducted between June 2017 and December 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 3: The district did not consistently ensure the required teacher participants were in attendance at meetings for students eligible for special education and related services (general education and special education) and at meetings for students eligible for speech language services (general education).

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 and/or written parental consent to excuse a

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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 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 June 2017 and December 2017, and to review the oversight procedures.

Finding 4: 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 completed by members of the child study team did not consistently include an observation of the student in other than a testing setting and an interview with the child's parent. Evaluations reports completed by the speech-language specialist did not consistently include an interview with the child's teacher and parent, a review of the child's developmental history, and a review of interventions.

Citation: N.J.A.C. 6A:14-3.4(f)4(i-vi); 20 U.S.C. §1414(b)(1)-(3), and 1412(a)(6)(b); and 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 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 evaluated between June 2017 and December 2017, and to review the oversight procedures.

Finding 5: The district did not consistently provide to students eligible for special education and related services written notice of graduation containing all required components 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 students with disabilities who will graduate at the conclusion of the current school year, and to review the oversight procedures.

Finding 6: 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.

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Citation: N.J.A.C. 6A:14-3.3(e) and 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 citation listed above. A monitor from the NJDOE will conduct an on-site visit to interview staff, review documentation from meetings conducted between June 2017 and December 2017, and to review the oversight procedures.

Finding 7: The district did not consistently conduct reevaluations within three years of the previous classification date for students eligible for special education and related services.

Citation: N.J.A.C. 6A:14-3.8(a) and 20 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 the 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 June 2017 and December 2017, and to review the oversight procedures.

Finding 8: 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; 20 U.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 participation of a child study team member in the transition planning conferences conducted between June 2017 and December 2017 for students transitioning from early intervention to preschool, and to review the oversight procedures.

Finding 9: The district did not consistently conduct multi-disciplinary initial evaluations for students referred for speech-language services by obtaining a written educational impact statement from the classroom teacher.

Citation: N.J.A.C. 6A:14-2.5(b)6 and 3.6(b).

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Required Action: The district must ensure a multi-disciplinary evaluation is conducted for students referred for speech-language services by obtaining a statement from the general education teacher detailing 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 June 2017 and December 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.