



State of New Jersey

DEPARTMENT OF EDUCATION

PO BOX 500

TRENTON, NJ 08625-0500

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Governor

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Commissioner

December 20, 2013

Dr. Michelle Cappelluti, Superintendent  
Hamilton Township School District  
1876 Dr. Dennis Foreman Drive  
Mays Landing, NJ 08330

Dear Dr. Cappelluti:

The New Jersey Department of Education has completed a review of funds received and disbursed from one or more federal programs by the **Hamilton Township Board of Education**. 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, 2011 through April 16, 2013. 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/finance/jobs/monitor/consolidated>.

Utilizing the process outlined in the attached "Procedures for LEA/Agency Response, Corrective Action Plan and Appeal Process," the Hamilton Township Board of Education 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 Anthony Hearn at (609) 633-2492.

Sincerely,

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

RJC/AH/dk:Hamilton Twp.BOE Cover Letter/consolidated monitoring  
Enclosures

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**HAMILTON TOWNSHIP SCHOOL DISTRICT**  
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*New Jersey K-12 Education*

**CONSOLIDATED MONITORING REPORT  
DECEMBER 2013**

**District:** Hamilton Township School District  
**County:** Atlantic  
**Dates On-Site:** April 16 and 17, 2013  
**Case #:** CM-003-12

**FUNDING SOURCES**

| Program             | Funding Award       |
|---------------------|---------------------|
| Title I             | \$ 422,563          |
| IDEA Basic          | 786,862             |
| IDEA Preschool      | 32,126              |
| Title IIA           | 72,306              |
| Title III           | 14,360              |
| Title III Immigrant | 15,745              |
| Race to the Top     | 37,317              |
| Total Funds         | <u>\$ 1,381,279</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 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, and Race to the Top). 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.

**INTRODUCTION**

The NJDOE visited the Hamilton 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: Race to the Top, Title I, Part A (Title I); Title II, Part A (Title II); Title III, Title III Immigrant and IDEA for the period July 1, 2011 through April 16, 2013 and planned expenses for the current year.

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 that were reviewed included Race to the Top; Title I; Title II; Title III; Title III Immigrant and IDEA from July 1, 2011 through April 16, 2013. A sampling of purchase orders was taken from the entire population and later identified as to the grant that was charged.

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**GENERAL DISTRICT OVERVIEW OF USES OF TITLE I, TITLE III, RACE TO THE TOP AND IDEA FUNDS**

**Title I Projects**

The district used its FY 2012-2013 Title I funds to implement targeted assistance programs in the two elementary schools and a schoolwide program in the middle school. Primarily, the district provides extended day and extended year programs, as well as in-class support.

**IDEA Projects (Special Education)**

The majority of the FY 2012-2013 IDEA Basic funds were 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. Nonpublic funds were used to support paraprofessional salaries and purchase instructional supplies for students with disabilities attending nonpublic school programs.

**Title III and III Immigrant**

The district used its FY 2012-2013 grant to provide stipends for extended day programs to help English language learners, professional development and instructional equipment.

**Race to the Top**

The district used all of the FY 2012-2013 Race to the Top funds to support a teacher evaluation system using the Danielson Group's The Framework for Teaching Evaluation Instrument and the purchase of iPads for implementation.

**DETAILED FINDINGS AND RECOMMENDATIONS**

**Title I**

**Finding 1:** In the notification letter to parents of Title I students in the elementary schools, the district did not include the entrance criteria or the exit criteria (the middle school is exempt from this requirement because it operates a schoolwide program). Without this information, parents are unable to understand the reasons for their child being selected to participate in the Title I program, and the academic levels needed for their child to exit the program.

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

**Required Action:** In the notification letter to families of students in the Title I program, the district must include the multiple measures it uses to identify students for eligibility. The letter must also include the reason for identification, as well as clearly defined exit criteria. The district's notification letters must be updated for FY 2013-2014 to include

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detailed entrance and exit criteria. The revised letter must be submitted to the NJDOE for review.

**Finding 2:** The district does not have a parental involvement program that reflects the requirements of the Title I legislation. Specifically, the district does not have the following mandatory components:

- School-level parental involvement policy; and
- Parent-Teacher-Student Compact developed at the school-level.

The legislation requires that districts provide opportunities for parents to have an active role in their child's education, which include decision making activities such as providing input into the development of the school-level parental involvement policy and the school-parent compact.

**Citation:** ESEA §1118: *Parental Involvement*.

**Required Action:** The district must ensure each Title I school has a school-level parental involvement policy and school-level compacts for Title I parents. The district must submit a copy of the policy to the NJDOE for review, as well as the invitation and agenda for the FY 2013-2014 Title I annual meeting.

**Finding 3:** There is no evidence the district is providing equitable services to the families and teachers of eligible students in nonpublic schools who receive Title I services. The purchase of supplies without an instructional component is not equitable to what the district's Title I students receive and deprives nonpublic students of the necessary services to address their academic needs.

**Citation:** ESEA §1120(a): *Participation of Children Enrolled in Private Schools General Requirement*). ESEA §1120A(b): *Fiscal Requirements (Federal Funds to Supplement, Not Supplant, Non-Federal Funds)*. *USDE Non-Regulatory Guidance, Title I Services to Eligible Nonpublic Students, October 17, 2003, Question B-38*.

**Required Action:** The district must immediately begin the process to consult with nonpublic schools that enroll residents to discuss appropriate instructional services for eligible students. The district's consultation meetings must also include discussions about appropriate strategies for the inclusion of students' families and teachers. The district must submit documentation of the FY 2013-2014 consultation process, such as the invitation letter, agenda, minutes and sign in sheets, to the NJDOE for review.

**Finding 4:** The district did not issue a Parents' Right-to-Know Letter for FY 2012-2013. The district's failure to issue this letter deprives families of how to access critical information that impacts their child's educational success.

**Citation:** ESEA Regulations §200.61, *Parents' Right to Know*.

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**Required Action:** The district must immediately notify parents of their right to ask about staff qualifications and notify them about the status of highly qualified staff. The district must provide a copy of the FY 2013-2014 Parents' Right-to-Know Letter to the NJDOE for review.

**Finding 5:** The district used Title I funds to purchase books for the entire school population at the George L. Hess Educational Complex and Joseph C. Shaner Memorial School supplants state/local funds. Both schools operate a Title I targeted assistance program; yet, the books were placed in the classroom for the use of all students. As a result, the books are not supplemental materials to provide Title I students with services above and beyond the services provided to the schools' non-Title I students.

**Citation:** NCLB §1120A(b): *Fiscal Requirements (Federal Funds to Supplement, Not Supplant, Non-Federal Funds)*.

**Required Action:** The district must reverse the charges for these books and identify state/local funds to support the charges. The district must submit documentation of the expenditure reversal to the NJDOE for review.

**Finding 6:** The district purchased a web-based teacher evaluation system in the current year for all the schools in the district. The lack of supplemental material for Title I students does not give the Title I student the services above and beyond what all other students receive in the course of their education.

**Citation:** ESEA §1120A(b): *Fiscal Requirements (Federal Funds to Supplement, Not Supplant, Non-Federal Funds)*.

**Required Action:** The district must reverse the charges for the web-based teacher evaluation system and identify state and local funds to support this expenditure. The district must submit documentation of the adjusting journal entry to the NJDOE for review.

**Finding 7:** The district does not have a comprehensive equipment inventory for items purchased with Title I funds. The inventory list should be detailed and contain all assets that are less expensive to inventory than they are to be replaced. The inventory is necessary to ensure grant funded equipment is identifiable and readily available for the use of Title I students only.

**Citation:** EDGAR, PART 80--*Uniform Administrative Requirements for Grants and Cooperative Agreements to State and Local Governments*, Section 32, Equipment.

**Required Action:** The district must develop a system to track equipment purchased with federal grants. Although the state threshold for reporting equipment is \$2,000 in the Electronic Web Enabled Grant (EWEG) system, the district may have its own lower threshold. The district must track any amount that is less expensive to track than it is to replace. The inventory must include a list of all items with the corresponding tag

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number, cost, location, purchase date, grant source that funded the purchase and a description of the item. The district must submit a comprehensive inventory of all equipment purchased to the NJDOE for review.

**Title II**

A review of the expenditures charged to the Title II grant yielded no findings.

**Title III/Title III Immigrant**

**Finding 8:** The district's use of Title III funds to fully fund the ACCESS for English Language Learners (ELL) assessment supplants state/local funds. N.J.A.C. 6A:15 (Bilingual Education) requires that districts assess the English language proficiency of Limited English Proficient (LEP) students. However, districts that receive Title III funds must administer the ACCESS for ELLS to satisfy legislative requirements for assessing LEP students. Districts may use their Title III funds to pay for the portion of ACCESS for ELLs that is above and beyond the costs to administer an English Proficiency Test that meets the requirements of N.J.A.C. 6A:15. For FY 2012-2013 districts may use up to \$12.00 per student of their Title III funds to support the costs to administer ACCESS for ELLs.

**Citation:** ESEA §3115(g): *Subgrants to Eligible Entities, Supplement not Supplant.* ESEA §2123(b): *Fiscal Requirements (Federal Funds to Supplement, Not Supplant, Non-Federal Funds).*

**Required Action:** The district must calculate the appropriate share of Title III funds that may be dedicated to administering the ACCESS for ELLs assessment, which is \$12.00 per student. The district must then reverse the Title III funds expended beyond the \$12.00 per student rate, and identify state/local funds to support this expenditure.

**IDEA (Special Education)**

**Finding 9:** Based on a representative document review, IDEA grant funds were used for paraprofessionals and to purchase assistive technology devices for students attending nonpublic schools. However, the use of a paraprofessional and assistive technology devices are not reflected in the Service Plans (SP) of students attending nonpublic schools.

**Citation:** IDEA regulations 34 CFR §300.130-300.144.

**Required Action:** The services listed in the ISPs to be provided through the IDEA grant must match the services listed in the IDEA grant application. The district must develop procedures to ensure that ISPs include the services provided through IDEA funds. At the next regularly occurring annual review meeting, the district must ensure each SP lists the services and devices purchased to support instructional programs for students with disabilities.



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**Finding 10:** The district's notices of IEP meetings did not consistently inform the parent that transition planning was a purpose of the meeting.

**Citation:** N.J.A.C. 6A:14-2.3(k)3,5; 20 U.S.C. §1414(b)(1); and 34 CFR §300.304(a).

**Required Action:** The district must ensure parents are provided notice of a meeting that contains 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 regarding the procedures for implementing the requirements in the citation listed above. The district must implement an oversight mechanism to regularly review the district's special education data system to ensure forms for the provision of notice of a meeting include all required components. A monitor from the NJDOE will conduct an on-site visit to interview staff, review copies of notices of IEP meetings where transition services will be discussed for meetings conducted between September 2013 and February 2014 and to review the oversight procedures.

**Finding 11:** The district did not consistently provide copies of evaluation reports to parents at least 10 days prior to the determination of initial eligibility or continued eligibility for students referred and/or eligible for special education and related services and for students referred and/or eligible for speech-language services.

**Citation:** N.J.A.C. 6A:14-3.5(a); 20 U.S.C. §1414(b)(4); and 34 CFR §300.306(a).

**Required Action:** The district must provide copies of evaluation reports to parents not less than 10 days prior to the determination of eligibility. In order to demonstrate correction of noncompliance, the district must conduct training for child study team members and speech-language specialists and implement 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 provision of evaluation reports to parents for students whose eligibility meetings were held between December 2013 and February 2014, and to review the oversight procedures.

**Finding 12:** The district did not consistently convene IEP, reevaluation, and eligibility meetings with required participants for students eligible for special education and related services.

**Citation:** N.J.A.C. 6A:14-2.3(k)1(i-vii); 20 U.S.C. §1414(d)(1)(B); and 34 CFR §300.321(a).

**Required Action:** The district must ensure IEP, reevaluation, and eligibility meetings are conducted with required participants and that documentation of attendance or written parental consent to excuse a member of the team are maintained in the student's records. In order to demonstrate correction of noncompliance, the district must conduct training for child study team members and implement an oversight mechanism to ensure compliance with the requirements in the citation listed above. A monitor from the

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NJDOE will conduct an on-site visit to interview staff, review meeting documentation, including the sign in sheets, for meetings conducted between December 2013 and February 2014, and to review the oversight procedures.

**Finding 13:** The district did not consistently include goals and objectives in each IEP for students eligible for special education and related services.

**Citation:** N.J.A.C. 6A:14-3.7(c)1-11, (e) 1-17, and (f) N.J.A.C. 6A:14-4.10(a); 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 goals and objectives. In order to demonstrate correction of noncompliance, the district must conduct training for child study team members and implement an oversight mechanism to ensure compliance with the requirements in the citation listed above. To demonstrate the district has corrected the individual instances of noncompliance, the district must conduct a meeting of the IEP team to revise the IEPs for the specific students whose IEPs were identified as noncompliant. For all other students, the district must ensure IEPs developed at the next annual review meeting contain goals and objectives. A monitor from the NJDOE will conduct an on-site visit to interview staff, review the revised IEPs, IEPs developed for students whose meetings were held between December 2013 and February 2014, and to review the oversight procedures. The names of students whose IEPs were determined to be noncompliant will be provided to the district by the monitor.

**Finding 14:** 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 those placed in separate settings, consideration of placement in the least restrictive environment (LRE). Specifically, IEPs did not consistently include:

- the supplementary aids and services considered;
- an explanation of why the supplementary aids and services were rejected;
- 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 in general education will have on the students with disabilities or other students in the class; and
- for student in separate settings, district activities necessary to move 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 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. In order to demonstrate correction of noncompliance, the district must conduct training for child study team members and implement an oversight mechanism to ensure

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compliance with the citation 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 specific students whose IEPs were identified as noncompliant. For all other students removed from the general education setting for more than 20 percent of the day, at the next annual review meeting the district must document consideration of placement in the LRE. A monitor from the NJDOE will conduct an on-site visit to interview staff, review the revised IEPs, IEPs of students removed from the general education setting for more than 20 percent of the school day whose IEP meetings were conducted between December 2013 and February 2014, and to review the oversight procedures. The names of the students with IEPs that were identified as noncompliant will be provided to the district by the monitor.

**Finding 15:** The district did not consistently provide to students beginning at age 14, written invitations to meetings when post-school transition was being discussed.

**Citation:** N.J.A.C. 6A:14-2.3(k)2x and 3.7(e)13, 3.7(h); 20 U.S.C. §1414 (d)(1)(A)(i)(1)(VIII); 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 conduct training for child study team members and implement an oversight mechanism to ensure compliance with the citations listed above. A monitor from the NJDOE will conduct an on-site visit to interview staff, review copies of written invitations to students age 14 and above, and to review review the oversight procedures.

**Finding 16:** The district did not consistently maintain documentation of the 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 interventions are provided in the general education setting for students exhibiting academic and/or behavioral difficulties prior to referring the student for an evaluation. In order to demonstrate correction of noncompliance, the district must conduct training for administrators and I&RS staff and implement an oversight mechanism to ensure compliance with the citations listed above. A monitor from the NJDOE will conduct an on-site visit to interview I&RS team member and teachers, review documentation for students who were provided interventions in general education between December 2013 and February 2014, and to review the oversight procedures.

**Finding 17:** 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.

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

**Required Action:** The district must ensure that 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 implement an oversight mechanism to ensure compliance with 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 conducted between December 2013 and February 2014, and to review the oversight procedures.

**Finding 18:** 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. Specifically, evaluation reports for preschool age students did not consistently include the 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)(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 child study team members and implement an oversight mechanism to ensure compliance with the citation listed above. A monitor from the NJDOE will conduct an on-site visit to interview staff, review initial evaluation reports for preschool students evaluated between December 2013 and February 2014, and to review the oversight procedures.

**Race to the Top**

A review of the expenditures charged to the Race to the Top grant yielded no findings.

**Administrative**

**Finding 19:** The district has internal control policies and procedures to prevent contracting with disbarred vendors, but there was no evidence of implementation.

**Citation:** EDGAR, PART 80--*Uniform Administrative Requirements for Grants and Cooperative Agreements to State and Local Governments*, Section 36, Procurement.

**Required Action:** The district must update its procedures to demonstrate implementation of the internal control policies.

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**Finding 20:** The district does not have formal written policies for requesting reimbursement from the EWEG or System for Administering Grants Electronically systems. However, the monitoring team did verify the district's practice for requesting reimbursement through inquiries about the district's internal controls.

**Citation:** EDGAR, PART 80--*Uniform Administrative Requirements for Grants and Cooperative Agreements to State and Local Governments*, Section 20, Standards for financial management systems.

**Required Action:** The district must have a formal board policy concerning the reimbursement of grant funds. The district must submit a copy of its written policy to the NJDOE for review.

**Finding 21:** The district has no evidence of competitively contracting for the provision of goods and services by vendors. In accordance with the Public School Contracts Law (PSCL) [N.J.S.A. 18A:18A:10(a)], a board of education may place its order with a vendor offering the lowest price, including delivery charges, that best meets the requirements of the board of education. However, for all federal funds, districts need to review 34 CFR Part 80.36 on procurement requirements. The federal procurement regulations under this section do not include all the exemptions allowed under the PSCL and therefore, these federal regulations require districts to competitively contract or bid all goods and services under the bid threshold, whether exempt under PSCL or not. The federal rules do include provisions for procurement by "noncompetitive proposals," but only under certain circumstances.

**Citation:** EDGAR, PART 80--*Uniform Administrative Requirements for Grants and Cooperative Agreements to State and Local Governments*, Section 36, Procurement.

**Required Action:** The district should review 34 CFR Part 80.36 and use open and competitive procedures where at all possible. The district should also analyze and include documentation in its files that demonstrates the district ensured the costs were reasonable.

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 Anthony Hearn via phone at (609) 633-2492 or via email at [anthony.hearn@doe.state.nj.us](mailto:anthony.hearn@doe.state.nj.us).