



State of New Jersey

DEPARTMENT OF EDUCATION

PO Box 500

TRENTON, NJ 08625-0500

CHRIS CHRISTIE
Governor

KIM GUADAGNO
Lt. Governor

CHRISTOPHER D. CERF
Commissioner

August 19, 2013

Mr. John Biladeau, Superintendent
Gloucester Township Public Schools
17 Erial Road
Blackwood, NJ 08012

Dear Mr. Biladeau:

The New Jersey Department of Education has completed a review of funds received and disbursed from one or more federal programs by the **Gloucester 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 June 3, 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 Gloucester 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:Gloucester Twp. BOE Cover Letter/consolidated monitoring
Enclosures

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GLOUCESTER TOWNSHIP PUBLIC SCHOOLS
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New Jersey K-12 Education

CONSOLIDATED MONITORING REPORT
AUGUST 2013

District: Gloucester Township Public Schools
County: Camden
Dates On-Site: June 3 and 4, 2013
Case #: CM-006-12

FUNDING SOURCES

Program	Funding Award
Title I	\$ 974,313
IDEA Basic	1,973,877
IDEA Preshool	124,232
Title IIA	179,787
Title III	30,467
Race to the Top	70,810
Total Funds	<u>\$ 3,353,486</u>

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BACKGROUND

The Elementary & 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 Gloucester 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 following programs: Race to the Top; Title I, Part A (Title I); Title IIA; Title III and IDEA for the period July 1, 2011 through June 3, 2013 and planned expenses for the current year (2012-2013).

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 IIA; Title III and IDEA from July 1, 2011 through June 3, 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 USE OF TITLE I, IDEA, TITLE IIA, TITLE III
AND RACE TO THE TOP FUNDS**

Title I Projects

The district used its FY 2012-2013 Title I, Part A funds to implement a targeted assistance program. Primarily, the district provides in-class support to struggling students and extended learning opportunities through after school and summer programs.

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 funding provides instructional assistants and speech therapy services for students with disabilities.

Title IIA Projects

The district used its Title IIA funds on class size reduction staff at Blackwood Elementary School and Loring Flemming Elementary School.

Title III Projects

The district is spending Title III funds on after school tutoring and an upcoming summer camp for English as a Second Language (ESL) Teachers.

Race to the Top

The district used its FY 2012-2013 Race to the Top grant to support a teacher evaluation system through a consortium using the Marzano model, and to purchase computers for implementation of the evaluation system.

DETAILED FINDINGS AND RECOMMENDATIONS

Title I

Finding 1: In the notification letter to parents of Title I students, the district did not provide detailed entrance criteria. Without this information, parents are unable to understand the reasons for their child being selected to participate in the Title I 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. The district's notification

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letters must be updated for FY 2012-2013 (Summer School) to include detailed entrance criteria. The revised letter must be submitted to the NJDOE for review.

Finding 2: The district does not have a parental involvement program that meets the Title I legislative and regulatory requirements. Specifically, the district did not implement the following mandatory components:

- the annual meeting for parents of students participating in the Title I program;
- the school-level parental involvement policy; and
- the School-Parent Compact.

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

Citation: ESEA §1118: *Parental Involvement*.

Required Action: The district must ensure each Title I school has an annual meeting, school-level parental involvement policy and School-Parent Compact. The district must submit a copy of these documents to the NJDOE for review.

Finding 3: The district does not have the required supporting documents to verify the activity of school level personnel charged to the Title I grant. The documentation must reflect what personnel are doing and must match their funded percentage. This documentation is necessary to verify grant-funded personnel are performing responsibilities consistent with the intents and purposes of the grant.

Citation: OMB Circular A-87, Attachment B, Section 8(h): *Cost Principles for State, Local and Indian Tribal Governments (Compensation for personal services)*.

Required Action: The district must submit time sheets for May and June of 2013 for all funded personnel to the NJDOE for review.

Finding 4: The district is not tracking the expenditure of funds from the parental involvement reserve. The district's FY 2012 final report indicated \$9,248 in unexpended funds from the parental involvement reserve. The district should have carried this amount into its FY 2013 application to supplement the FY 2013 parental involvement reserve. However, the FY 2012 unexpended parental involvement funds were not included in the district's FY 2013 application. The district also has only spent \$981 of the current year parental involvement reserves of \$9,191.

The legislation requires that districts receiving a Title I allocation of \$500,000 or more, must reserve at least one percent for activities to promote family literacy and parenting skills. A district may not use less than the reserved one percent for these activities.

Citation: ESEA §1118(a)(3)(A): *Parental Involvement*.

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Required Action: The district must immediately amend its FY 2013 ESEA grant application to reflect the parental involvement reserve of \$18,439 (\$9,248 for the FY 2012 project period and \$9,191 for the FY 2013 project period). The district must either spend the \$9,248 reserved for parental involvement in the FY 2012 project period or release the funds to the NJDOE at the end of the FY 2013 project period.

Finding 5: The district does not track expenditures by attendance areas to ensure the expenses for Title I schools are consistent with each attendance area's allocation on Eligibility Page, Step 4 of the FY 2012-2013 ESEA-NCLB Consolidated Application. Tracking of expenditures is an internal control to ensure each school is receiving programs and services up to the amount of funding generated by each school.

Citation: EDGAR, PART 80--*Uniform Administrative Requirements for Grants and Cooperative Agreements to State and Local Governments*, Section 20, Standards for financial management systems; NCLB §9306(a)(5): *Other General Assurances (Assurances)*.

Required Action: The district must track Title I school-level allocations reflected in the FY 2013 ESEA-NCLB Consolidated Application for Title I funds (Eligibility Page, Step 4). The tracking for FY 2012-2013 must be submitted to the NJDOE for review.

Finding 6: The district does not have a comprehensive equipment inventory for items purchased with Title I funds. The inventory is necessary to ensure grant-funded equipment is easily 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 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.

Finding 7: The district is not providing equitable services to resident nonpublic school students, their families or their teachers. The district was unable to document that it consulted with nonpublic schools outside the district's boundaries. Instead, the district's consultation process and service delivery plan was restricted to nonpublic schools that are located within the district's boundaries. The Title I equitable services requirement extends to resident students that attend nonpublic schools beyond the district's boundaries.

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Citation: NCLB §1120(a): *Participation of Children Enrolled in Private Schools (General Requirement)*.

Required Action: The district must contact the nonpublic schools that enroll resident students to inform them of the opportunity to participate in the Title I program. The district must then schedule a consultation meeting with participating nonpublic schools and develop a plan to provide services to eligible resident nonpublic students. The district must submit documentation of the communication sent to nonpublic schools to the NJDOE for review.

Finding 8: The district is paying the staff at the nonpublic school as consultants to tutor the nonpublic students after school. Proper accounting would have these staff as employees as opposed to subcontractors.

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 put the nonpublic school staff on its payroll or subcontract the work to a vendor. The district must submit evidence of a change for the 2013-2014 grant year to the NJDOE for review.

Title IIA

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

IDEA (Special Education)

Finding 9: The district is providing a classroom assistant at the Erial Christian School and a classroom assistant and speech-therapist at Our Lady of Hope School. However, the service plans of students attending those schools do not require the services of a classroom assistant or a speech therapist. A requirement of the IDEA grant is that at least one service plan of students educated in the general education class lists the need for the classroom assistant and that the service plans of students receiving individual or group speech-language services list that related service.

Citation: N.J.A.C. 6A:14-6.1(f); 20 U.S.C. 1412(a)(10)(A)(vi); 34 CFR §138(b).

Required Action: The services listed in the service plans to be provided through the IDEA grant need to match the services listed in the IDEA grant application. The district must revise the service plans, in accordance with required procedures, to reflect the services provided under the grant. The related services page of the grant has a dedicated space for this purpose. A monitor from the NJDOE will conduct an on-site visit to review the revised service plans.

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Finding 10: The district did not consistently provide notice of a meeting with all the required components for students eligible for 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(d)(1)(B)(i); and 34 CFR §300.322.

Required Action: The district must ensure parents are provided notice of a meeting in writing, 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 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 of the provision and content of notices for meetings conducted between September 2013 and December 2013, and to review the oversight procedures.

Finding 11: The district did not consistently provide written notice to parents containing all required components. Specifically, written notice of initial evaluation for students evaluated for speech-language services did not include the options considered and why those options were rejected.

Citation: N.J.A.C. 6A:14-2.3(f), (g), and (h); 20 U.S.C. §1415(b)(3) and(4); 34 CFR §300.503.

Required Action: The district must ensure parents are provided written notice following a meeting that contains all required components within 15 calendar days of the meeting. 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. The district must implement an oversight mechanism to regularly review the district's special education data system to ensure forms for provision of written notice include required components. A monitor from the NJDOE will conduct an on-site visit to interview staff and review documentation of the provision and content of written notice for meetings conducted between September 2013 and December 2013, and review the oversight procedures.

Finding 12: The district did not consistently provide copies of evaluation reports to parents at least 10 days prior to the meeting to determine eligibility.

Citation: N.J.A.C. 6A:14-3.5(a); 20 U.S.C. §1414(b)(4); and 34 CFR §300.3006(a).

Required Action: The district must ensure parents are provided copies of evaluation reports not less than 10 days prior to the meeting to determine eligibility. 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

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on-site visit to interview staff and review documentation of evaluations conducted between September 2013 and December 2013, and the oversight procedures.

Finding 13: The district did not consistently conduct an annual IEP team meeting for each student eligible for special education and related services and speech-language services.

Citation: N.J.A.C. 6A:14-3.7(i); 20 U.S.C. §1414(d)(4)(B); and 34 CFR §300.324(b)(1).

Required Action: The district must ensure IEP team meetings are conducted annually, or more often if necessary, to review, revise and determine the programs and placement of each student with an IEP. 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 review documentation of annual review time lines for IEP meetings conducted between September 2013 and December 2013 and the oversight procedures.

Finding 14: The district did not consistently convene identification meetings with the required participants for students referred for speech-language services.

Citation: N.J.A.C. 6A:14-2.3(k); 20 U.S.C. §1414(b)(4); and 34 CFR §300.306(a)(1).

Required Action: The district must ensure all meetings are conducted with required participants and documentation of attendance is maintained. . 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 documentation of participation from meetings conducted between September 2013 and December 2013, and review the oversight procedures.

Finding 15: The district did not consistently document all required considerations and statements in each IEP. Specifically, IEPs developed for students eligible for special education and related services did not include:

- goals and objectives; and
- methods of evaluation to determine student progress.

Additionally, the Present Level of Academic Achievement and Functional Performance statement in IEPs of students eligible for speech-language services did not contain documentation of strengths of the student.

Citation: N.J.A.C. 6A:14-3.7(c), (e) , and (f); 20 U.S.C. §1414(d)(3)(A)(B); and 34 CFR §300.324(a)(1)(2).

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Required Action: The district must ensure each student's IEP includes documentation of these considerations and required 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 citation listed above. To demonstrate the district has corrected the individual instances of noncompliance, the district must conduct IEP 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 IEPs for students whose annual review meetings were conducted between September 2013 and December 2013, and review the oversight procedures. Names of the students whose IEPs were identified as noncompliant will be provided to the district by the monitor.

Finding 16: 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:

- the supplementary aids and services considered;
- an explanation of why the supplementary aids and services were rejected;
- 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, and 3.7(k); 20 U.S.C. §1412(a)(5); 34 CFR §300.114.

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 the placement are documented in the IEP, as required, for each student removed from general education. The district must also ensure for students placed in separate settings, the IEP team identifies district 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 citation listed above. To demonstrate the district has corrected the individual instances of noncompliance, the district must conduct IEP 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 and review the revised IEPs, the IEPs for students whose annual review meetings were conducted between September 2013 and December 2013, and the oversight procedures. Names of the students with IEPs that were identified as noncompliant will be provided to the district by the monitor.

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Finding 17: The district did not consistently complete transition planning for students ages 14 and above and document decisions in the IEP.

Citation: N.J.A.C. 6A:14-3.7(e)11.

Required Action: The district must ensure that transition is discussed at each IEP meeting for students age 14 or above, and that decisions are documented in the 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 citation listed above. Additionally, the district must conduct annual review meetings to review and, if necessary, revise IEPs for the specific students whose IEPs were identified as noncompliant during monitoring. A monitor from the NJDOE will conduct an on-site visit to interview staff and review IEPs for the specific students whose IEPs were identified as noncompliant during monitoring, the IEPs of students, age 14 and older, developed between September 2013 and December 2013, and the oversight procedure. Names of the students whose IEPs were identified as noncompliant will be provided to the district by the monitor.

Finding 18: The district did not consistently provide to students beginning at age 14, written invitations to meetings where transition was being discussed.

Citation: N.J.A.C. 6A:14-2.3(k)2x; 20 U.S.C. §1414 (B)(k); 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 and review copies of student invitations to annual review meetings conducted between September 2013 and December 2013, and the oversight procedure.

Finding 19: The district did not conduct identification meetings within 20 calendar days of receipt of a written request for evaluation for students referred for speech-language services.

Citation: N.J.A.C. 6A:14-3.3(e).

Required Action: The district must ensure identification meetings are conducted within 20 calendar days of receipt of a written request for evaluation and required participants are in attendance. 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. To demonstrate implementation of the procedures, a monitor from the NJDOE will conduct an on-site visit to interview staff and review documentation from meetings conducted between September 2013 and December 2013, and review the oversight procedures.

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Finding 20: The district did not conduct vision/hearing screenings and health/medical summaries for every student referred to the CST.

Citation: N.J.A.C. 6A:14-3.4(j), 3.3(g) and (h).

Required Action: The district must ensure vision and audiometric screenings are conducted for every student referred to the child study team with a copy of the results maintained in students' files, along with available health/medical summaries. 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 review documentation verifying receipt of the health summary, including the vision and hearing screening, for students referred to the child study team between September 2013 and December 2013, and review the oversight procedure.

Finding 21: 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 citations listed above. A monitor from the NJDOE will conduct an on-site visit to review initial evaluation reports for students referred for speech-language services whose eligibility meetings were held between September 2013 and December 2013, and review the oversight procedures.

Finding 22: 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 and for students referred for speech-language services.

Citation: N.J.A.C. 6A:14-3.4(f)4; 20 U.S.C. §1414(b)(1)-(3); and 34 CFR §300.304.

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 regarding the district's procedures for implementing the requirements in the citations listed above. The district is referred to the sample report form for speech-language evaluations which is located at: <http://www.state.nj.us/education/specialed/form/>. The district must implement an oversight mechanism to regularly review evaluation reports to verify all required sections of the functional assessment are conducted as a component of initial evaluations. The

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NJDOE will conduct an on-site visit to interview staff and review initial evaluation reports for students evaluated between September 2013 and December 2013 and review the oversight procedures.

Finding 23: The district did not consistently conduct reevaluations within three years of the previous classification date for students eligible for special education and related services and for students eligible for speech-language services.

Citation: N.J.A.C. 6A: 14-3.8(a) and 20 U.S.C. §1414(a)(2) and (d); and 34 CFR §300.303(a)(2).

Required Action: The district must ensure reevaluations are conducted within required time lines with required participants 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 and review reevaluations conducted between September 2013 and December 2013, and the oversight procedures.

Race to the Top

Finding 24: The district does not have a comprehensive equipment inventory for items purchased with Race to the Top funds. The inventory is necessary to ensure grant-funded equipment is identifiable.

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 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 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.

Administrative

Finding 25: The district does not have internal control policies and procedures to prevent contracting with disbarred vendors.

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 internal control policies to prevent errors from potentially occurring.

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Finding 26: 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 27: 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.