



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

CHRIS CHRISTIE
Governor

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Lt. Governor

CHRISTOPHER D. CERF
Commissioner

August 15, 2013

Mr. John Saporito, Superintendent
Lawrence Township Board of Education
25 Main Street
Cedarville, NJ 08311

Dear Mr. Saporito:

The New Jersey Department of Education has completed a review of funds received and disbursed from one or more federal programs by the **Lawrence 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 23, 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 Lawrence 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:Lawrence Twp. BOE Cover Letter/consolidated monitoring
Enclosures

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LAWRENCE TOWNSHIP SCHOOL DISTRICT
25 MAIN STREET
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New Jersey K-12 Education

**CONSOLIDATED MONITORING REPORT
AUGUST 2013**

District: Lawrence Township School District
County: Cumberland
Dates On-Site: April 22 and 23, 2013
Case #: CM-020-12

FUNDING SOURCES

Program	Funding Award
Title I	\$ 269,731
IDEA Basic	162,047
IDEA Preschool	4,528
Title IIA	18,812
Race to the Top	21,165
Total Funds	<u>\$ 476,283</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 Lawrence 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 IIA; and IDEA for the period July 1, 2011 through April 23, 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; and IDEA from July 1, 2011 through April 23, 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, IDEA 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 is planning a summer program.

IDEA Projects (Special Education)

The majority of the FY 2012-2013 IDEA Basic funds are being used for contracted child study team services with Salem County Special Services School District. Services purchased include evaluations, case management and consultation. A portion of the funds were allocated to reduce district tuition expenditures for one student receiving special education services in an approved private school for students with disabilities.

Race to the Top

All of the FY 2012-2013 Race to the Top grant was utilized to support a teacher evaluation system in conjunction with a consortium using the Marzano model and the purchase of computers for implementation.

DETAILED FINDINGS AND RECOMMENDATIONS

Title I

Finding 1: In the notification letter to parents of Title I students, the district did not include the entrance or the exit criteria for the 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 performance 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 to include detailed entrance and exit criteria. The revised letter was submitted to the NJDOE and mailed in late April 2013 and no further action is needed.

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 a district-level parental involvement policy. The legislation requires that districts provide opportunities for

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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 district-level parental involvement policy.

Citation: ESEA §1118: *Parental Involvement*.

Required Action: The district must develop a parental involvement policy that is consistent with the Title I legislation. The district must submit a copy of the policy to the NJDOE for review.

Finding 3: The district purchased a teacher evaluation system in the current year. The system was used to evaluate teachers at the school which operated a targeted assistance program. Thus, teachers working with Title I students did not receive services that are above and beyond the services received by teachers not working with Title I students.

Citation: OMB Circular A-87, Attachment B, Section 8(h): *Cost Principles for State, Local and Indian Tribal Governments*. NCLB §1120A(b): *Fiscal Requirements (Federal Funds to Supplement, Not Supplant, Non-Federal Funds)*.

Required Action: The district must reverse the charges for the teacher evaluation system and identify state and local funds to support this expenditure. The district must submit documentation of the reversal to the NJDOE for review.

Finding 4: The district does not have the required supporting documents to verify the activity of staff charged to the Title I or Title IIA grants. The documentation must reflect what the staff is doing and must match their funded percentage. This information is necessary to ensure that grant funded staff are performing duties that are consistent with the applicable funding source.

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 submitted time sheets for all funded staff and no further action is needed.

Finding 5: The district's use of Title I funds to operate a replacement Language Arts program for identified Title I students supplants state and local funds. The district must use its state/local funds to provide core courses that are required under the district's curriculum. The district may not use state/local funds for non-Title I students to assess a core course and federal funds for Title I students to assess the same core course. The operation of a replacement program does not give the Title I student services that are above and beyond the services that non-Title I students receive.

Citation: ESEA §1115(c) *Targeted Assistance Programs, Components of a Targeted Assistance Program*; USDE Policy letter October 6, 2008.

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Required Action: The district must revise its FY 2013-2014 Title I program to provide services to Title I students in Language Arts that are in addition to the core curricular requirement and above and beyond services provided to non-Title I students. The district must also reverse the charges for the Read 180 staffing and identify state/local funds to support this expenditure. The district must submit verification of the reversal to the NJDOE for review, and a narrative describing the revised Title I program.

Title IIA

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

IDEA (Special Education)

Finding 6: The district did not consistently document all required considerations and statements in IEPs for students eligible for special education and related services and for students eligible for speech-language services. Specifically, IEPs for students eligible for special education and related services did not consistently include:

- method of evaluating student progress on goals and objectives.

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

- strengths of the students;
- method of evaluating student progress on goals and objectives;
- documentation of participation in statewide assessments; and
- documentation of consideration of extended school year.

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 components. In order to demonstrate correction of noncompliance, the district must conduct training for child study team members and speech-language specialists regarding district procedures for implementing the requirements in the citation listed above. To demonstrate the district has corrected the individual instances of noncompliance, the district must conduct annual review meetings and revise IEPs for the specific students whose IEPs were identified as noncompliant. The district must implement an oversight mechanism to regularly review IEPs for consistent inclusion of considerations and required statements. A monitor from the NJDOE will conduct an on-site visit to interview staff, review the revised IEPs, a random sample of additional IEPs for students whose annual review meetings will be conducted between September 2013 and December 2013 and the oversight procedures. Names of the students whose IEPs were identified as noncompliant will be provided to the district by the monitor.

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

- a comparison of the benefits of general education and the benefits of special education;
- the potentially beneficial or harmful effects which a placement in the general education setting may have on 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.

In addition, the rationale for removal from general education was not individualized based on student need.

Citation: N.J.A.C. 6A:14-4.2 (a)8(i),(ii) and (iii).

Required Action: The district must ensure IEP teams discuss placement of students in the LRE and document all required decisions in the student's IEPs. 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. To demonstrate the district has corrected the individual instances of noncompliance, the district must conduct annual review meetings and revise IEPs for specific students whose IEPs were identified as noncompliant. At the next IEP meeting for all other students removed from general education for greater than 20 percent of the school day or placed in a separate setting, the district must discuss and document all required components of the IEP. The district must implement an oversight mechanism to regularly review IEPs for consistent inclusion of documentation of the discussion regarding placement in the LRE. A monitor from NJDOE will conduct an on-site visit to interview staff and review the revised IEPs, IEPs for students whose annual review meetings will be conducted between September 2013 and December 2013 and the oversight procedures.

Finding 8: The district did not consistently conduct all required sections of the functional assessment as a component of initial evaluations for students referred for speech-language services. Specifically, evaluations did not include a parent interview. Noncompliance was due to a lack of implementation of district procedures.

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 speech-language specialists regarding the district's procedures for implementing the requirements in the citations listed above. The district must implement an oversight mechanism to regularly review

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evaluation reports to ensure they contain all required components of a functional assessment. A monitor from the NJDOE will conduct an on-site visit to review initial evaluation reports for preschool students who will be evaluated between September 2013 and December 2013 and 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 9: 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 to prevent errors from potentially occurring.

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.