



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

July 15, 2013

Mr. Christopher Onorato, Superintendent  
Ridgefield Park Public Schools  
712 Lincoln Avenue  
Ridgefield Park, NJ 07660

Dear Mr. Onorato:

The New Jersey Department of Education has completed a review of funds received and disbursed from one or more federal programs by the **Ridgefield Park 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 December 31, 2012. 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 Ridgefield Park 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 Steven Hoffmann at (973) 621-2750.

Sincerely,

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

RJC/SH/dk:Ridgefield Park BOE Cover Letter/consolidated monitoring  
Enclosures

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

**RIDGEFIELD PARK BOARD OF EDUCATION**  
712 LINCOLN AVENUE  
RIDGEFIELD PARK, NJ 07660  
PHONE: (201) 641-0800



*New Jersey K-12 Education*

**CONSOLIDATED MONITORING REPORT  
JULY 2013**

**District:** Ridgefield Park Public Schools  
**County:** Bergen  
**Dates On-Site:** January 15, 16 and 17, 2013  
**Case #:** CM-046-12

**FUNDING SOURCES**

Program	Funding Award
Title I	\$ 402,346
IDEA Basic	465,447
IDEA Preschool	14,639
Title IIA	53,527
Title III	25,071
Title III Immigrant	22,813
Total Funds	<u><u>\$ 983,843</u></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 and IDEA). 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 Ridgefield Park 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: Title I; Title IIA; Title III and IDEA for the period July 1, 2011 through December 31, 2012.

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 Title I, Title IIA, Title III, IDEA Basic and Preschool from July 1, 2011 through December 31, 2012. A sampling of purchase orders and/or salaries was taken from each program reviewed.

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**GENERAL DISTRICT OVERVIEW OF USES OF TITLE I AND IDEA FUNDS**

**Title I Projects**

Title I funds were expended to support instructional salaries and benefits, purchased services and instructional supplies.

**IDEA Projects (Special Education)**

IDEA funds were used to fund tuition for students with disabilities where in-district programs could not appropriately support the students' academic and emotional needs. In addition, the district is utilizing IDEA funds for instructional supplies, purchased professional services, conferences, and non-instructional supplies. The district is utilizing preschool IDEA funds for tuition and instructional and non-instructional supplies.

**DETAILED FINDINGS AND RECOMMENDATIONS**

**Title I**

**Finding 1:**

**Condition:** At the time of the monitoring visit, the district was unable to provide evidence that multiple measures were consistently applied to determine student eligibility for Title I services. The monitors were unable to verify if the district is actually serving its lowest performing students and that all students receiving services actually met the eligibility criteria.

**Citation:** ESEA §1115: *Targeted Assistance Schools*.

**Required Action:** The district must revise its criteria for the Title I program to include multiple, educationally related objective criteria for both entrance into and exit from the program. Poverty measures are not acceptable entrance criteria for Title I services. Acceptable criteria include student performance on state assessments, benchmark assessments, local assessments, end-of-unit tests, portfolio assessments and grades. In addition, the school must establish a system to ensure students receiving Title I services meet each of the established entrance criteria.

**Finding 2:**

**Condition:** The district provided activity reports along with Title I teachers' schedules, but the documents lacked all of the required components for timesheets. The documentation must reflect what the staff is doing, when (time slots) and where (school or central office) and must match their funded percentage. This information is necessary to ensure grant-funded personnel are actually performing grant-related duties consistent with the Title I funds allocated for their salary.

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**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 verify the time and activity of staff charged to the grant. The activity reports and the teachers' schedules need to be combined and the funded percentage of time added to the revised time sheets. The district must submit a list of FY 2012-2013 Title I funded staff, salaries, funding percentages and time sheets to date to the NJDOE for review.

**Finding 3:**

**Condition:** The FY 2012-2013 Title I eligibility participation letter did not clearly state the exit criteria used to identify Title I eligible students. Without this information, parents are unable to understand the performance levels needed for their child to exit the program.

**Citation:** ESEA §1115: *Targeted Assistance Schools*; ESEA §1118(c): *Parental Involvement (Policy Involvement)*.

**Required Actions:** In its Title I participation letter, the district must include clearly defined exit criteria. The district must provide a copy of its revised FY 2013-2014 Title I participation letter to the NJDOE for review.

**Finding 4:**

**Condition:** A review of the FY 2012–2013 Title I expenditures revealed unallowable costs were charged to the program. These costs include external professional development activities that include both Title I and non-Title I staff. In addition, the district used Title I funds for professional development workshops on subjects that benefited all teachers; not just Title I teachers. The above referenced FY 2012-2013 Title I expenditures supplant state/local funds.

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

**Required Action:** The district must reverse these charges and allocate state/local funds, rather than using Title I funds to support these expenditures. The district must provide evidence of the journal entry to reverse the expenditures to the NJDOE for review.

**Finding 5:**

**Condition:** The FY 2012-2013 school-parent compacts only outlined the responsibilities of the parents and schools. The compacts did not include the roles and responsibilities of the students. The exclusion of the students' roles and responsibilities does not offer all

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said parties an opportunity to understand their role in the shared responsibilities for student academic achievement.

**Citation:** ESEA §1118(d): *Parental Involvement (Shared Responsibilities for High Student Academic Achievement).*

**Required Action:** The district must include the associated stakeholder groups in the development of the school-parent compact and articulate the roles and responsibilities for the school, parent, and student in the school-parent compact. The district must submit the revised 2013-2014 school-parent compact to the NJDOE for review.

**Finding 6:**

**Condition:** The district does not have a parental involvement program that reflects the requirements of Title I. There is no evidence the district's parental involvement policy was reviewed and board adopted since January 26, 2011, and that school-level policies were reviewed since December 2002. The annual review and board adoption of the district level parental involvement policy, and the annual review of the school-level parental involvement policies provide an opportunity for parents and other stakeholders to have input into the parental involvement program and identify the unique needs of the Title I schools and parents of Title I students.

**Citation:** ESEA §1118(a)(2): *Parental Involvement (Written Policy)*; ESEA §1118(b): *Parental Involvement (School Parental Involvement Policy).*

**Required Action:** The district must have both a district parental involvement policy and school-level parental involvement policy that are evaluated annually. The district should provide technical assistance to its schools in the development of school-level parental involvement policies and ensure its schools work with their stakeholder groups to develop the policies. The district must submit copies of board approved district parental involvement policy and school-level policies for the 2013-2014 school year to the NJDOE for review.

**Finding 7:**

**Condition:** The district did not communicate with nonpublic schools outside of the district's attendance area that enroll resident students. Therefore, the district did not include nonpublic enrollment and poverty numbers on the FY 2012-2013 ESEA Consolidated Application in Step One of the Title I, Part A eligibility tab. The absence of nonpublic enrollment and poverty numbers in Step One of the Title I, Part A prevents eligible resident nonpublic students from receiving services.

**Citation:** ESEA §1120: *Participation of Children Enrolled In Private School.*

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**Required Action:** For the FY 2013-2014 ESEA Consolidated Application, the district must communicate and accurately reflect both the number of resident nonpublic school students and the number of low-income resident nonpublic school students who attend nonpublic schools inside and outside the district's attendance area. The district must immediately contact all nonpublic schools that enroll resident students to inform the schools of their opportunity to participate in the district's Title I program. The district must then begin the consultation process with the nonpublic schools to identify eligible students and develop a service delivery plan, if applicable. The district must send documentation of the consultation process (e.g., invitational letters, agendas, meeting notes, sign in sheets) to the NJDOE for review.

**Title IIA**

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

**Title III and Title III Immigrant**

A review of the expenditures charged to the Title III and Title III Immigrant grants yielded no findings.

**IDEA (Special Education)**

**Finding 8:**

**Condition:** In the FY 2011-2012 grant year, the district misclassified the expenditures for bus transportation for field trips/educational opportunities in their accounting system. The trips were classified as professional and technical services (200-320) when they should have been listed as student transportation services (270-512) in their accounting system.

**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 update its applications and corresponding accounting records to classify items purchased according to their correct function.

**Finding 9:**

**Condition:** In the FY 2011-2012 grant year, the district misclassified the expenditures for Smart Boards in supplies and materials (100-610) when it should have been classified under instructional equipment (100-731) in their accounting system.

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



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**Required Action:** The district must update its applications and corresponding accounting records to classify items purchased according to their object.

**Finding 10:**

**Condition:** In the FY 2011-2012 and FY 2012-2013 grant years, the district transferred substantial amounts of money to different lines within the grant for supplies and materials, but did not amend the grant to reflect the changes. For example, in the FY 2011-2012 grant, the district allocated \$8,671 in line 100-600, and then \$20,897 was transferred into that line for purchases charged to it. No amendment was submitted.

**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 submit revised grant applications to include how funds will be expended.

**Finding 11:**

**Condition:** In the FY 2011-2012 grant year, the review of purchase orders revealed the district purchased items in the 400-732 section, however, this expenditure was not included in the original plan and the plan was not updated to reflect expenditures in the 400-732 section of the grant.

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

**Recommendation:** Amendments cannot be made to the FY 2011-2012 grant, but it is recommended that going forward the district amend its plan whenever the original plan is altered.

**Special Education**

**Finding 12:**

**Condition:** The district exceeded group size requirements when providing services to students in speech-language therapy groups. Noncompliance was due to a lack of implementation of district procedures.

**Citation:** N.J.A.C. 6A:14- 4.4(a)1.i.

**Required Action:** The district must ensure that code requirements regarding group size are followed. In order to demonstrate correction of noncompliance, the district must conduct training for speech-language specialists regarding procedures for implementing the requirements in the citation listed above. Additionally, the district must revise the schedules of speech-language specialists to ensure group size requirements are met. A

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monitor from the NJDOE will conduct an on-site visit to interview staff members and review the revised schedules.

**Finding 13:**

**Condition:** The district did not consistently provide parents of students eligible for special education and related services and students eligible for speech-language services notice of a meeting for identification, eligibility, reevaluation planning and IEP team meetings. Additionally, the district's notices of meetings did not consistently contain all required components. Specifically, notices of a meeting did not include the purpose of meeting, right to invite others, and provision of Parental Rights in Special Education (when required). Noncompliance was due to a lack of consistent implementation of district procedures.

**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 provide parents notice of a meeting in writing that contains all required components, early enough to ensure they have 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 regarding the procedures for implementing the requirements in the citation listed above. A monitor from the NJDOE will conduct an on-site visit to interview staff and review meeting documentation for meetings conducted between March 2013 and June 2013.

**Finding 14:**

**Condition:** The district did not consistently provide parents written notice that contains all required components, within 15 calendar days following identification, eligibility and initial IEP meetings for students referred and/or eligible for speech-language services. Noncompliance was due to a lack of consistent implementation of district procedures.

**Citation:** 20 U.S.C. §1414(b)(1)(c)(4)(A); 34 CFR §300.304(a)(4); and 34 CFR §300.305(a) and N.J.A.C. 6A:14- 2.3(f) and 2.3(g)1-7.

**Required Action:** The district must ensure parents are provided written notice, which contains all required components of a meeting within 15 calendar days of the meeting. In order to demonstrate correction of noncompliance, the district must provide training for speech-language specialists regarding the procedures for implementing the requirements in the citation listed above. In addition, a monitor from the NJDOE will conduct an on-site visit to review copies of written notice sent to parents following meetings conducted between March 2013 and June 2013.

**Finding 15:**

**Condition:** The district did not consistently provide copies of evaluation reports to parents at least 10 days prior to the determination of initial and reevaluation eligibility when assessments were conducted for students referred for special education and related

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services and for students referred for speech-language services. Noncompliance was due to a lack of implementation of district procedures.

**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 ensure parents are provided copies of evaluation report(s) 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 regarding procedures for implementing the requirements in the citation listed above. A monitor from the NJDOE will conduct an on-site visit to interview staff and review documentation of provision of evaluation reports to parents for students evaluated for special education and related services and speech-language services between March 2013 and June 2013.

**Finding 16:**

**Condition:** The district did not provide written notice of graduation within required time lines to students eligible for special education and related services. Noncompliance was due to a lack of implementation of the district procedures.

**Citation:** N.J.A.C. 6A:14-4.11(b)2.

**Required Action:** The district must ensure that parents or adult students are provided 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 regarding the procedures for implementing the requirements in the citation listed above. A monitor from the NJDOE will conduct an on-site visit to review written notice of graduation for students who are graduating at the conclusion of the 2012-2013 school year.

**Finding 17:**

**Condition:** The district did not consistently convene identification, eligibility, initial eligibility/IEP, and reevaluation meetings with required participants for students eligible for special education and related services and students referred for speech-language services. Specifically, a general education teacher was not in attendance. Noncompliance was due to a lack of implementation of district procedures.

**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 that identification, eligibility, initial eligibility/IEP, and reevaluation meetings are conducted with required participants and that documentation of attendance and/or written parental consent to excuse a member of the team are maintained in student's records. In order to demonstrate correction of noncompliance, the district must conduct training for child study team members and speech-language specialists regarding the procedures for implementing the requirements in the citation listed above. A monitor from the NJDOE will conduct an on-site visit to

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interview staff and review meeting documentation, including the sign in sheets, for meetings conducted between March 2013 and June 2013.

**Finding 18:**

**Condition:** The district did not consistently document consideration of placement in the least restrictive environment 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. Specifically, IEPs did not consistently include:

- a comparison of the benefits provided in the regular class and the benefits provided in the special education class; and
- for those students placed in separate settings, activities to transition the student to a less restrictive environment.

Noncompliance was due to a lack of implementation of district procedures.

**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 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 regarding the district's procedures. 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 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, along with the IEPs for students whose annual review meetings were conducted between March 2013 and June 2013. Names of the students with IEPs that were identified as noncompliant will be provided to the district by the monitor.

**Finding 19:**

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

- supports for school personnel;
- the Present Level of Functional Performance statement in IEPs of students eligible of speech-language services did not contain documentation of student strengths;
- measurable annual goals and objectives;
- participation in district wide assessments; and
- consideration of extended school year for students eligible for speech language services.

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Noncompliance was due to a lack of implementation of district procedures.

**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 all 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. To demonstrate the district has corrected the individual instances of noncompliance, the district must conduct annual review meetings and revise IEPs for specific students who IEPs were identified as noncompliant. A monitor from the NJDOE will conduct an on-site visit to interview staff and review the revised IEPs, along with the IEPs for students whose annual review meetings were conducted between March 2013 and June 2013. Names of the students whose IEPs were identified as noncompliant will be provided to the district by the monitor.

**Finding 20:**

**Condition:** The district is not providing related services as required in the IEPs for students eligible for special education and related services and students eligible for speech-language services. The program pages of several IEPs indicated that related services would be provided “as needed,” “consultation only” or “variable.” The students whose IEPs contained such statements did not appear on the schedules of related services providers and the district could not provide evidence demonstrating provision of services. Noncompliance was due to noncompliant district procedures.

**Citation:** N.J.A.C. 6A:14-3.7(a)1-4 and 20 USC1412(a)(5); 34 CFR §300.119.

**Required Action:** The district must ensure the IEP documents the frequency, duration and location of related services and that students receive the related services required by the IEP. In order to demonstrate correction of noncompliance, the district must revise their procedures and provide training for child study team members, speech-language specialists and all related service providers regarding the new procedures for implementing the requirements in the citation listed above. In addition, the district must conduct annual review meetings and revise IEPs for specific students who IEPs were identified as noncompliant. A monitor from the NJDOE will conduct an on-site visit to interview staff and review the revised IEPs, along with the IEPs for students whose annual review meetings were conducted between March 2013 and June 2013. Names of the students whose IEPs were identified as noncompliant will be provided to the district by the special education monitor.

**Finding 21:**

**Condition:** The district did not conduct meetings within 20 calendar days of receipt of a written request for evaluation for students referred for special education and related services or students referred for speech-language services. Noncompliance was due to a lack of implementation of district procedures.

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**Citation:** N.J.A.C. 6A:14-2.5(b)6; 3.3(e) and 3.6(b).

**Required Action:** The district must ensure a meeting is conducted within 20 calendar days of receipt of a written request for evaluation to determine if an evaluation is warranted. In order to demonstrate correction of noncompliance, the district must conduct training for child study team members and speech-language specialists regarding the procedures for implementing the requirements in the citation listed above. A monitor from the NJDOE will conduct an on-site visit to interview staff and review the dated initial request for evaluation for students referred for special education and related services and for students referred for speech-language services and the participant signatures from the resulting meetings conducted between March 2013 and June 2013.

**Finding 22:**

**Condition:** The district did not consistently conduct vision/hearing screenings and forward results to the child study team for every student referred to the Child Study Team. Noncompliance was due to a lack of consistent implementation of district procedures.

**Citation:** N.J.A.C. 6A:14-3.4(j).

**Corrective 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. 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 ensure implementation of the procedures, a monitor from the NJDOE will conduct an on-site visit to interview staff and review documentation verifying receipt of the health summary, including the vision and hearing screening, for students referred to the child study team between March 2013 and June 2013.

**Finding 23:**

**Condition:** 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. 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 child study team members and speech-language specialists regarding the district's procedures for implementing the requirements in the citation listed above. Additionally, a monitor from the NJDOE will conduct an on-site visit to interview staff and review initial evaluation reports for students evaluated between March 2013 and June 2013.

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**Finding 24:**

**Condition:** The district did not consistently ensure that students found eligible for speech-language services met the eligibility criteria. Noncompliance was due to a lack of implementation of district procedures.

**Citation:** N.J.A.C. 6A:14- 3.6(b)1-3; 20 U.S.C. §1401(3); and 34 CFR §300.306(b).

**Required Action:** The district must ensure the criteria set forth in N.J.A.C. 6A:14-3.6(b) are used to determine eligibility for speech-language services. In order to demonstrate correction of noncompliance, the district must conduct training for speech-language specialists regarding the procedures for implementing the requirements in the citation listed above. A monitor from the NJDOE will conduct an on-site visit to interview staff and review documentation of eligibility for meetings conducted between March 2013 and June 2013.

**Finding 25:**

**Condition:** The district did not consistently conduct reevaluations within three years of the previous classification date for students currently eligible for special education and related services and for students eligible for speech-language services. Noncompliance was due to a lack of implementation of district procedures.

**Citation:** N.J.A.C. 6A: 14-3.7(i) and 14-3.8(a) and 20 U.S.C. §1414(a)(2)(B)(ii) and (d); and 34 CFR §300.324(b)1.

**Required Action:** The district must ensure reevaluations are conducted within required time lines. 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. Additionally, a monitor from the NJDOE will conduct an on-site visit to interview staff and review evidence of determination of continued eligibility for students identified during monitoring along with the signature page from eligibility meetings held as part of the reevaluation process between March 2013 and June 2013. Names of the students whose triennial reevaluation time lines were not met will be provided to the district by the monitor.

**Finding 26:**

**Condition:** The district does not have a policy for the provision of accommodations and modifications or, when appropriate, an alternate assessment for students with disabilities participating in district wide assessments.

**Citation:** 34 CFR §300.160.

**Required Action:** The district must revise policies and procedures to ensure students with disabilities participate in district wide assessments and each IEP contains a

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statement of any individual modifications to be provided to the student in the administration of district wide assessments. The policy must include the provision of accommodations and modifications and the provision of alternate assessments for those children who cannot participate in the regular assessment. If the district reports publicly on the district wide assessment, the district must also report with the same frequency and in the same detail as it reports on the assessment of nondisabled children. 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. In addition, a monitor from the NJDOE will conduct an on-site visit to review the policy and IEPs developed between February 2013 and May 2013.

**Administrative**

**Finding 27:**

**Condition:** On several occasions, the district failed to issue a purchase order prior to goods being purchased or services being rendered (confirming order). District policy and state regulations require that a properly executed purchase order be issued prior to the purchase of goods or the rendering of services.

**Citation:** EDGAR, PART 80--*Uniform Administrative Requirements for Grants and Cooperative Agreements to State and Local Governments*, Section 20, Standards for financial management systems. N.J.S.A. 18A:18A(2)(v) *Public School Contracts Law*.

**Required Action:** Purchase orders should be issued to all vendors prior to goods or services being provided.

**Finding 28:**

**Condition:** Monitors noted several instances where payments exceeded the purchase order amount without documented authorization. Increasing purchase orders and related payments without proper authorization is an internal control weakness and a violation of the New Jersey Accountability Regulations.

**Citation:** EDGAR, PART 80--*Uniform Administrative Requirements for Grants and Cooperative Agreements to State and Local Governments*, Section 20, Standards for financial management systems. N.J.A.C. 6A:23A-6.10 *Approval of amounts paid in excess of approved purchase orders; board policy*.

**Required Action:** The district must adopt a policy establishing the approval process for any remittance of payment for invoice amounts greater than the approved purchase order. The policy shall require the school business administrator (SBA) to identify, and investigate, if necessary, the reason for any increase to the purchase order. If it is found that such an increase is warranted, the SBA shall either approve a revision to the original purchase order with the reason noted, approve the issuance of a supplemental purchase



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order for the difference, or cancel the original purchase order and issue a new purchase order.

**Finding 29:**

**Condition:** The district charged equipment purchases to the incorrect general ledger account. Equipment purchases with a total unit cost in excess of \$2,000 were improperly charged to supplies. In determining the total unit cost of equipment the district did not include all components and ancillary costs incurred that were necessary to place the asset in its intended location and in condition where it is ready for use. New Jersey regulations and district policy require that equipment with a unit cost greater than \$2,000 be charged as equipment.

**Citation:** Uniform Minimum Chart of Accounts for New Jersey Public Schools, EDGAR, PART 80—*Uniform Administrative Requirements for Grants and Cooperative Agreements to State and Local Governments*, Section 32, Equipment.

**Required Action:** The district should charge all equipment purchases of \$2,000 or greater to an equipment account. Ancillary costs, such as installation and delivery, should be included in the unit cost.

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 Steven Hoffmann via phone at (973) 621-2750 or via email at [steven.hoffmann@doe.state.nj.us](mailto:steven.hoffmann@doe.state.nj.us).