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DEPARTMENT OF EDUCATION PO Box 500 Trenton, NJ 08625-0500

DAVID C. HESPE Acting Commissioner

July 14, 2014

Dr. Salvatore Illuzzi, Superintendent Cinnaminson Township Public Schools 2195 Riverton Road Cinnaminson, NJ 08077-3729

Dear Dr. Illuzzi:

The New Jersey Department of Education has completed a review of funds received and disbursed from one or more federal programs by the <u>Cinnaminson Township Board of Education</u>. 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, 2013 through April 15, 2014. 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 Cinnaminson 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 Lori Ramella at (609) 984-0937.

Sincerely.

Robert J. Cicchino, Director

Office of Fiscal Accountability and Compliance

RJC/LR/I:\tconaway\Cinnaminson Twp Consolidated Monitoring cover letter.docx Enclosures

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New Jersey K-12 Education

CONSOLIDATED MONITORING REPORT JULY 2014

District:

Cinnaminson Township School District

County:

Burlington

Dates On-Site:

April 15 and 16, 2014

Case #:

CM-008-13

FUNDING SOURCES

Program	Funding Award	
Title I, Part A Title II, Part A	\$	164,488
IDEA Basic		66,012 551,358
IDEA Preschool Total Funds		23,410
Total Fullus		805,268

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, Race to the Top and Carl D. Perkins). The laws further require that state education agencies such as the New Jersey Department of Education (NJDOE) monitor the implementation of federal programs by sub recipients and determine whether the funds are being used by the district for their intended purpose and achieving the overall objectives of the funding initiatives.

INTRODUCTION

The NJDOE visited the Cinnaminson 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: Title I, Part A (Title I); Title II, Part A (Title II); and IDEA Basic and Preschool for the period July 1, 2013 through April 15, 2014.

The scope of work performed included the review of documentation including grant applications, program plans and needs assessments, grant awards, annual audits, board minutes, payroll records, accounting records, purchase orders, and current district policies and procedures. The monitoring team members reviewed the supporting documentation for a sample of expenditures and conducted internal control reviews, as well as conducted interviews with program administrators and other district personnel as required. Additionally, the IDEA grant review included 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, and interviews of child study team members and speech-language specialists.

EXPENDITURES REVIEWED

The grants that were reviewed included Title I, Title II and IDEA Basic and Preschool for the period July 1, 2013 through April 15, 2014. A sampling of purchase orders was taken from the entire population and later identified as to the grant that was charged.

GENERAL DISTRICT OVERVIEW OF THE USE OF TITLE I, TITLE II AND IDEA FUNDS

Title I

The district used FY 2013-2014 Title I funds to operate a targeted assistance program at its four Title I funded schools: Cinnaminson High School, Cinnaminson Middle School, Eleanor Rush Intermediate School, and New Albany Elementary School. The district has identified English Language Arts and Mathematics for all students as its identified priority problems.

Title II

The district used Title II funds for professional development and class-size reduction.

IDEA (Special Education)

The district used the FY 2014 IDEA funds to reduce district tuition expenditures for students receiving special educational services in other public school districts and approved private schools for students with disabilities. IDEA funds are also used for professional development for special education staff, instructional supplies and supplementary materials required by the IEPs of students with disabilities. The remainder of the IDEA funds were allocated to support students who attend nonpublic schools located within the district. Nonpublic special education services include instructional aides, in class support, related services, technology equipment and instructional materials.

DETAILED FINDINGS AND RECOMMENDATIONS

Title I

Finding 1: The district's use of Title I funds for the following expenditures supplanted state and local funds:

- Unfunded teachers attending a workshop/conference (PO# 14-1572; PO# 14-1258; PO# 14-1012; PO# 14-1259);
- Harassment, Intimidation, and Bullying (HIB) training (PO# 14-1244);
- Common Core training (PO# 14-2423);
- Formative Assessments for the Common Core (PO# 14-1259); and
- Differentiation and the Common Core (PO# 14-1896).

Citation: ESEA §1120A (b) (1): Federal Funds to Supplement, Not Supplant, Non - Federal Funds.

Required Action: The district must reverse the charges and reallocate state/local funds to support these expenditures. The district must submit documentation of the adjusting journal entry reversing these charges to the NJDOE for review.

Finding 2: The parental notification letters sent by the district to the parents/guardians of identified Title I students did not include clearly defined entrance and exit criteria. The parents/guardians of identified Title I students must be informed of the multiple educationally-related criteria, as well as benchmark assessment scores used to identify their child/children for Title I services.

Citation: ESEA §1115(B): Targeted Assistance Programs (Eligible Children from Eligible Population).

Required Action: The district must include clearly defined entrance and exit criteria in all of its parental notification letters. The district must provide a copy of its revised parental notification letter to the NJDOE for review.

Finding 3: The district failed to provide evidence of when the district's Title I written parental involvement policy was distributed to the parents/guardians of students participating in the Title I program for the 2013-2014 school year. In accordance with legislative requirements, parents/guardians of Title I students have a right to be involved in the development of the written parental involvement policy, as well as be informed of ways they can further engage themselves in the academic performance and achievement of their children.

Citation: ESEA §1118(b): Parental Involvement (School Parental Involvement Policy).

Required Action: For the 2014-2015 school year, the district must ensure that all of its funded Title I schools distribute the district's written parental involvement policy to parents/guardians of the Title I students and submit the letter and documentation of distribution to the NJDOE for review.

Finding 4: The district failed to provide evidence documenting that it had convened the annual Title I parent meeting for the Cinnaminson High School, Eleanor Rush Intermediate School and the New Albany Elementary School, as required. The parents/guardians of identified Title I students are entitled to be informed about the district's participation in Title I programs, legislative requirements, and ways in which they can be involved in helping their child/children succeed academically.

Citation: ESEA §1118(c)(1): Parental Involvement (Policy Involvement).

Required Action: For the 2014-2015 school year the district must convene the annual Title I parent meeting for the parents/guardians of its identified Title I students at all of its Title I funded schools. Further, the district must submit the invitational letter/flier, agenda, meeting minutes, and sign-in sheets documenting that each meeting was held to the NJDOE for review.

Title II

Finding 5: The district failed to adequately document the time and activity of personnel funded with Title II grant funds. As a result, the district did not fully comply with required federal timekeeping standards. To be compliant, such documentation must reflect what the staff is doing, when and where they are working and it must support their funded percentage. Employees whose salaries are funded 100% by the federal program must complete a semi-annual certification attesting to their performance of Title II related duties. Staff members whose salaries are partially funded by Title II must prepare monthly personal activity reports.

Citation: 2 CFR Part 225 Appendix B §8(h): Support of salaries and wages.

Required Action: The district must ensure employees submit detailed personal activity reports that have been verified by supervisors, as required.

Finding 6: The district used Title II funds for professional development activities for a non-content area as defined by the U.S. Department of Education (USDOE). The *National Sex Education Conference* (P.O. 14-1602) is not an allowable activity.

Citation: ESEA §9101(11): Core Academic Subjects.

Required Action: The district must reverse the charges for the *National* Sex *Education Conference* (PO# 14-1602) that were not directly related to the Title II professional development allowable uses as defined by the USDOE and reallocate state/local funds to support the expenditure. The district must submit documentation of the adjusting journal entry reversing these charges to the NJDOE for review.

Finding 7: The use of Title II funds for supplies in the amount of \$450.00 (PO# 14-2801) supplants state/local funds. Additionally, the supplies were not directly connected to professional development. Title II funds cannot be used for activities that the district would otherwise carry out in the absence of these funds.

Citation: ESEA §2123(b): Supplement, Not Supplant.

Required Action: Subsequent to the completion of field work, the district provided documentation that it had reappropriated Title II grant funds earmarked for this expenditure and paid for the supplies with state/local funds. Going forward, the district should implement procedures to ensure that Title II funds are used to supplement not supplant state/local funds.

Highly Qualified Teacher Recommendations

Recommendation 1: The completed appropriate New Jersey Highly Qualified Teacher Approved Forms www.state.nj.us/education/profdev/nclb should be included in every teacher's

personnel file along with a copy of any supporting documentation(s) such as; teaching certificate(s), Praxis scores, transcripts, and/or National Board Certification.

Recommendation 2: Highly qualified forms and documentation should be kept in the personnel file in a secure location, at the district Board of Education Office.

The FY 2013 carryover funds were used for additional professional development for the public school but the nonpublic school allocation was not adjusted to reflect the increased Hold Harmless amount. The nonpublic school Hold Harmless Amount should have been based on the \$36,000 that was spent for professional development (a \$15,391 increase from the original \$20,609 allocation) when amendment 1 was submitted. Instead, the hold harmless amount was not adjusted to reflect an increase in funds for the nonpublic schools.

IDEA (Special Education)

Finding 8: The district did not consistently provide parents of students eligible for speech-language services notice of a meeting for identification, reevaluation planning and IEP team meetings.

Citation: N.J.A.C. 6A:14-2.3(k)3, 5; 20 U.S.C. §1414(b)(1); 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 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 meeting documentation for meetings conducted between September 2014 and December 2014, and review the oversight procedures.

Finding 9: The district did not consistently provide parents written notice that contains all required components, within 15 calendar days following identification, eligibility, IEP and reevaluation planning meetings for students eligible for speech-language services.

Citation: 20 U.S.C. §1414(b)(1)(c)(4)(A); 34 CFR §300.304(a)(4); 34 CFR §300.305(a) 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 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. A monitor from the NJDOE will conduct an on-site visit to interview staff, review meeting documentation for meetings conducted between September 2014 and December 2014, and to review the oversight procedures.

<u>Finding 10:</u> The district did not consistently obtain written parental consent or document efforts to obtain written parental consent to conduct reevaluation assessments for students eligible for speech-language services.

Citation: N.J.A.C. 6A:14-2.3(a); 20 U.S.C. §1414(a)(1)(D); 34 CFR §300.300(a).

Required Action: The district must ensure that informed parental consent is obtained and maintained in student files. The district must maintain documentation of attempts to obtain written parental consent to evaluate when the parent does not attend the reevaluation planning 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. A monitor from the NJDOE will conduct an on-site visit to interview staff, review meeting documentation for meetings conducted between September 2014 and December 2014, and review the oversight procedures.

<u>Finding 11:</u> The district did not consistently ensure that general education teachers were in attendance at identification, annual review, reevaluation planning, and eligibility and IEP meetings for students eligible for speech-language services.

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

Required Action: The district must ensure that meetings are conducted with required participants. 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 meeting documentation for meetings conducted between September 2014 and December 2014, and to review the oversight procedures.

Finding 12: The district did not consistently document all required considerations and statements in each IEP for students eligible for speech-language services. Specifically, IEPs of students eligible for speech-language services did not contain documentation of student strengths or results of recent evaluations.

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); 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 speech-language specialists and develop an oversight mechanism to ensure compliance with the requirements in the citation listed above. To demonstrate that 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. A monitor from the NJDOE will conduct an on-site visit to interview

staff, review the revised IEPs, along with a sample of IEPs developed at meetings conducted between September 2014 and December 2014, and review the oversight procedures. The names of the students whose IEPs were identified as noncompliant will be provided to the district by the monitor.

Finding 13: Tuition costs associated with the out-of-district placement of students at an approved private school for students with disabilities (PSSD) were not included in the board minutes. The district must access the tentative tuition rates published by the Office of School Finance on the NJDOE website or use the previous year's amount when there is a question about the cost of sending a student to a PSSD. Direct costs charged to a federal grant have to be adequately documented and approved.

Citation: 2 CFR Part 225 Appendix A §C(1): Factors affecting allowability of costs.

Required Action: The district must ensure all costs charged to federal awards are adequately documented and approved.

<u>Finding 14:</u> On several occasions, the district failed to issue a purchase order prior to services being rendered (confirming order). The district's policy and state regulations require that a properly executed purchase order be issued prior to services being rendered.

Citation: EDGAR, PART 80-Ubniform 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: The district must implement a process to ensure that purchase orders are issued prior to receiving goods and services from vendors.

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 Lori Ramella via phone at (609) 984-0937 or via email at lori.ramella@doe.state.nj.us.