



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

CHRIS CHRISTIE
Governor

KIM GUADAGNO
Lt. Governor

DAVID C. HESPE
Acting Commissioner

October 14, 2014

Mr. Joseph Isola
Chief School Administrator
Howell Township Public Schools
PO Box 579
Howell, NJ 07731

Dear Mr. Isola:

The New Jersey Department of Education has completed a review of funds received and disbursed from one or more federal programs by the **Howell 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, 2012 through March 20, 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 Howell 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/dk:Howell Twp. BOE Cover Letter /consolidated monitoring
Enclosures

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New Jersey K-12 Education

**CONSOLIDATED MONITORING REPORT
OCTOBER 2014**

District: Howell Township Public Schools
County: Monmouth
Dates On-Site: March 19 and 20, 2014
Case #: CM-038-13

FUNDING SOURCES

Program	Funding Award
Title I, Part A	\$ 218,473
Title II, Part A	161,936
Title III	30,462
IDEA Basic	1,523,129
IDEA Preschool	81,936
Race To The Top	23,497
Total Funds	<u>\$ 2,039,433</u>

**HOWELL TOWNSHIP PUBLIC SCHOOLS
CONSOLIDATED MONITORING REPORT
OCTOBER 2014**

BACKGROUND

The Elementary and Secondary Education Act (ESEA) and the Individuals with Disabilities Act (IDEA) and other federal laws require local education agencies (LEAs) to provide programs and services to their districts based on the requirements specified in each of the authorizing statutes (ESEA, IDEA, 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 Howell 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: Title I, Part A (Title I); Title II, Part A (Title II); Title III; IDEA Basic and Preschool; and Race to the Top for the period July 1, 2012 through March 20, 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, Title III, IDEA Basic and Preschool, and Race to the Top for the period July 1, 2012 through March 20, 2014. 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, TITLE II, TITLE III, IDEA
AND RACE TO THE TOP FUNDS**

Title I

The district operated targeted assistance programs at its four Title I funded schools: Ardena Elementary School, Land O’Pines Elementary School, Taunton Elementary School and Ramtown Elementary School. The district has identified Closing the Achievement Gap for all students as a priority problem.

Title II

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

Title III

The district used Title III funds for technology, English as a Second Language supplies, summer programs, materials, and paraprofessionals.

IDEA (Special Education)

The district used IDEA funds to support the salaries and benefits of special education teachers, child study team members and other district personnel assigned educational responsibility for students with disabilities. The IDEA funds were also used to reduce district tuition expenditures for students receiving special educational services in approved private schools for students with disabilities. The remainder of the IDEA funds were used for professional development for special education staff, class trips for students with disabilities, instructional and non-instructional equipment and supplies required by the IEPs of students with disabilities. The nonpublic proportionate share of the grant was used to provide an instructional aide through a vendor, Monmouth-Ocean Educational Services Commission (MOESC), for students with disabilities attending nonpublic schools.

Race to the Top

The district used Race to the Top funds on teacher evaluation tools, such as Documents to Go applications and iObservation, as well as for iPads to support the teacher evaluation tools.

DETAILED FINDINGS AND RECOMMENDATIONS

Title I

Finding 1: The district’s use of Title I funds for the Reading A-Z license (PO #1400850) supplanted state/local funds. In a Title I targeted assistance program, services may benefit only targeted students who meet the established criteria defined by the district/school. Services funded by Title I cannot benefit the entire school. Rather these funds must be used to

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supplement the existing educational program of the school by devising programs and services to bolster the academic performance of low-achieving students.

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

Required Action: The district must allocate state/local funds rather than using Title I funds to support this expenditure. The district must provide evidence of the adjusting accounting entry for the expenditure to the NJDOE for review. This finding has also been referred to the Office of Fiscal Accountability and Compliance (OFAC) for further review.

Finding 2: The Academic Support notification letters sent to the parents/guardians of identified Title I students did not include clearly defined 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 exit their child/children from the Title I program.

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

Required Action: The district's Title I schools must revise their FY 2014-2015 parental notification letters to include clearly defined entrance and exit criteria. The district must provide a copy of the revised parental notification letters to the NJDOE for review.

Title II

Finding 3: A review of the teaching schedules, licenses and High Objective Uniform Standard of Evaluation (HOUSE) Matrix documents revealed a veteran teacher on staff who is not highly qualified for the assigned position.

Example: The Personnel Employee Report and the Certification Personnel Employee Report shows a holder of the K-8 teaching certificate assigned to teach mathematics Basic Skills at the middle grades level. Teachers of Basic Skills must be highly qualified in the subject matter and grade level assigned. The HOUSE documents stated the teacher had eight points in mathematics based on coursework. A review of the transcript indicated only one eligible course for the award of two points. The calculation is incorrect and does not meet the minimum required number of points needed for this teacher to be considered highly qualified in mathematics. The teacher is not highly qualified for the assignment.

Citation: ESEA §1119(a)(1): *Qualifications for teachers and paraprofessionals;* and ESEA §1111(h)(6)(B)(ii): *Right to Know Letter.*

Required Action: The district must ensure that students receiving direct instruction are taught by a highly qualified teacher (HQT) in core subjects. Additionally, the district

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must notify parents of students attending Title I funded schools if the teacher does not meet state or federal qualifications/requirements.

Recommendation 1: Where Highly Qualified Teacher status has been incorrectly granted based on miscalculations or errors on the HOUSE Matrix forms, it is recommended that the documentation be identified as “invalid for assignment” and that teachers assigned to grades 6-8 departmentalized instructional settings comply with current HQT guidelines.

Title III

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

IDEA (Special Education)

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

Race to the Top

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

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.