



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

September 19, 2014

Dr. Robert Blake, Superintendent
Pinelands Regional Board of Education
520 Nugentown Road
Little Egg Harbor, NJ 08087

Dear Dr. Blake:

The New Jersey Department of Education has completed a review of funds received and disbursed from one or more federal programs by the **Pinelands Regional 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 December 5, 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 Pinelands Regional 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:Pinelands Reg. BOE Cover Letter /consolidated monitoring
Enclosures

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**STATE OF NEW JERSEY
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PINELANDS REGIONAL SCHOOL DISTRICT
520 NUGENTOWN ROAD
LITTLE EGG HARBOR, NJ 08087
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New Jersey K-12 Education

**CONSOLIDATED MONITORING REPORT
SEPTEMBER 2014**

District: Pinelands Regional School District
County: Ocean
Dates On-Site: December 4 and 5, 2013
Case #: CM-050-13

FUNDING SOURCES

Program	Funding Award
Title I, Part A	\$ 284,898
Title II, Part A	36,609
IDEA Basic	421,730
Race To The Top	18,000
Total Funds	<u>\$ 761,237</u>

**PINELANDS REGIONAL SCHOOL DISTRICT
CONSOLIDATED MONITORING REPORT
SEPTEMBER 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 Pinelands Regional 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); IDEA Basic; and Race to the Top for the period July 1, 2012 through December 5, 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, 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, IDEA Basic, and Race to the Top for the period July 1, 2012 through December 5, 2013. A sampling of purchase orders was taken from the entire population and later identified as to the grant that was charged.

**PINELANDS REGIONAL SCHOOL DISTRICT
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GENERAL DISTRICT OVERVIEW OF USE OF TITLE I, TITLE II, IDEA AND RACE TO THE TOP FUNDS

Title I

The district operates a targeted assistance program at its one Title I funded school: Pinelands Regional Junior High School. The district identified Closing the Achievement Gap, English Language Arts, and Mathematics for Economically Disadvantaged, and Disabled students as priority problems.

Title II

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

IDEA (Special Education)

The district used IDEA funds to reduce district tuition costs for students receiving special education services in an approved private school for students with disabilities.

Race to the Top

The district used Race to the Top funds for Observation and Marzano Training.

DETAILED FINDINGS AND RECOMMENDATIONS

Title I

Finding 1: The district's use of Title I funds for Smart Education - Mentoring/Coaching supplanted state/local funds. In a targeted assistance Title I program, services may benefit only targeted students attending Title I funded schools 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 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 to the NJDOE for review.

Finding 2: The 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 identify their child/children for Title I services.

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

Required Action: The district must revise its FY 2014-2015 parental notification letters to include clearly defined exit criteria. The district must provide a copy of the revised parental notification letter to the NJDOE for review.

Finding 3: The district could not provide evidence of when its Title I written parental involvement policy was distributed. Per the legislative requirement, parents/guardians of Title I students have a right to be involved in the development of the written parental involvement policy and 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 FY 2014-2015, the district must ensure that it distributes its written parental involvement policy to parents/guardians of the Title I students. The district must submit a narrative describing the mechanism for distribution of the policy to the NJDOE for review.

Title II

Finding 4: The designated employee who was charged to the federal grant was not approved in the district's board minutes for the 2013-2014 school year. All employees were properly board approved for the 2012-2013 school year. Approvals of this nature must be done annually to ensure that the district is practicing proper internal controls while managing its grant funds.

Citation: 34 CFR §80 20: Standards for financial management systems.

Required Action: The district must ensure all staff members charged to the grant are approved in the board minutes. The district must submit a list of FY 2013-2014 funded staff, salaries and funding percentages to the NJDOE for review.

IDEA (Special Education)

Finding 5: The district did not consistently document in the IEPs of students placed in a separate setting, consideration of placement in the least restrictive environment. Specifically, the IEPs did not consistently identify activities to move the student to a less restrictive environment.

Citation: N.J.A.C. 6A:14-4.2 (a) 4 and (a) 8 (i), (ii) and (iii).

Required Action: The district must ensure when determining the education 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 for more than 20 percent of the school day. The district must also ensure that for

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students placed in separate settings, the IEP team identifies 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 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, review the revised IEPs, a sample of IEPs for students whose annual review meetings were conducted between November 2014 and January 2015, and to review the oversight procedures. The names of the students with IEPs that were identified as noncompliant will be provided to the district by the monitor.

Finding 6: The district did not consistently ensure the required participants were in attendance at annual review IEP meetings, reevaluation planning meetings and eligibility determination meetings. Specifically, the district did not consistently have a general education teacher in attendance.

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 ensure that IEP team meetings are conducted with required participants and that documentation of attendance and/or written parental consent to excuse a member of the team is maintained in student files. 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 interview staff, review meeting documentation, including the sign in sheets, for meetings conducted between November 2014 and January 2015, and to review the oversight procedures.

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.