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

NEPTUNE TOWNSHIP SCHOOL DISTRICT
60 NEPTUNE BOULEVARD
NEPTUNE, NJ 07753
PHONE: (732) 776-2200

New Jersey K-12 Education

CONSOLIDATED MONITORING REPORT
MARCH 2016

District: Neptune Township School District
County: Monmouth
Dates On-Site: January 20 and 21, 2016
Case #: CM-030-15

FUNDING SOURCES

<table>
<thead>
<tr>
<th>Program</th>
<th>Funding Award</th>
</tr>
</thead>
<tbody>
<tr>
<td>Title I, Part A</td>
<td>$ 892,399</td>
</tr>
<tr>
<td>Title II, Part A</td>
<td>155,821</td>
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<tr>
<td>Title III</td>
<td>31,372</td>
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<tr>
<td>Title III Immigrant</td>
<td>17,707</td>
</tr>
<tr>
<td>IDEA Basic</td>
<td>1,305,195</td>
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<tr>
<td>IDEA Preschool</td>
<td>38,230</td>
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<tr>
<td><strong>Total Funds</strong></td>
<td><strong>$ 2,440,724</strong></td>
</tr>
</tbody>
</table>
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, 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 Neptune 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); Title III; Title III Immigrant; and IDEA Basic and Preschool for the period July 1, 2014 through January 21, 2016.

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, Title III Immigrant, and IDEA Basic and Preschool for the period July 1, 2014 through January 21, 2016. 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 USE OF TITLE I, TITLE II, TITLE III, TITLE III IMMIGRANT AND IDEA FUNDS

Title I

The district operates Title I Schoolwide programs in all six of its Title I funded schools: Midtown Community (formerly Ridge Avenue), Green Grove, Gables, Neptune Middle, Neptune High School, and Summerfield. The district identified Closing the Achievement Gap, English Language Arts, Mathematics, and Technology Literacy for All Students, Parents, and Teachers as its priority problems.

Title II

The majority of the district’s Title II funds were transferred to schoolwide programs and the remaining funds were used to support professional development in formative assessment, data analysis and literacy.

Title III

The district includes 18 English language learners (ELLs) that speak predominantly Spanish and French, and 81 immigrant students. The district offers English as a Second Language (ESL), intensive ESL, push-in and pull-out services, Sheltered Instruction Observational Protocol (SIOP), and bilingual classes. The district uses Title III funds for technology supplies, instructional software, and Sheltered Instruction Training.

IDEA (Special Education)

The FY 2015-2016 IDEA funds are being used to reduce district tuition costs for students receiving special educational services in other public school districts and approved private schools for students with disabilities. IDEA funds are also being used for the cost of instructional supplies and materials for students with disabilities, along with the cost of contracted service providers for both public and nonpublic students with disabilities.

DETAILED FINDINGS AND RECOMMENDATIONS

Title I

Finding 1: In its FY 2015-2016 ESEA Consolidated Application on the Electronic Web-Enabled Grant System (EWEG), the district included that it funded Neptune High School. However, the district’s intent was not to serve the high school.

Citation: ESEA §1113(a)(1-5): Eligible School Attendance Areas (Determination).
NEPTUNE TOWNSHIP SCHOOL DISTRICT
CONSOLIDATED MONITORING REPORT
MARCH 2016

**Required Action:** The district must immediately contact the Office of Grants Management (OGM) to revise its FY 2015-2016 Consolidated Application to accurately reflect the schools which it intends to serve with Title I funds for FY 2015-2016.

**Finding 2:** The district provided documentation that it distributed the Parents' Right-to-Know Letter; however, it did not contain the complete date (month, day, and year). The legislation requires a district to inform parents at the beginning of the school year and in a timely manner of the professional qualifications of their child’s classroom teachers.

**Citation:** ESEA §1111(h)(6)(A)(i-iv): State Plans (Reports - Parents' Right-to-Know).

**Required Action:** For FY 2016-2017, the district must ensure that it distributes completely dated (month, day, and year) Parents’ Right-to-Know letters at the beginning of the school year. A copy of the completely dated letter and evidence of its distribution must be submitted to the NJDOE for review.

**Finding 3:** The district was unable to provide documentation memorializing the annual Title I parent meeting held at each of its funded schools. In a Title I Schoolwide program, all parents/guardians must be informed of the legislative requirements and how they can become actively engaged in helping their child/children succeed academically. Parents/guardians must also be given an opportunity to provide feedback on the school’s Title I program.

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

**Required Action:** For FY 2016-2017, the district must retain documentation (e.g., invitational letters/flyers, sign in sheets, and meeting minutes) of the annual Title I parent meeting for each Title I school, and submit documentation of the meetings to the NJDOE for review.

**Finding 4:** The district provided documentation of school-parent compacts which did not meet the legislative requirements for the following schools: Green Grove and Midtown Community (formerly Ridge Avenue). All Title I funded schools must provide a mechanism to ensure that its parents/guardians are informed of the roles and responsibility of the school, parents/guardians, and students in achieving academic success.

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

**Required Action:** For FY 2015-2016, the district must immediately revise and distribute its Title I school-parent compacts to the students and parents of the aforementioned schools. The revised compacts must reflect all of the legislative requirements by including how the school, parent/guardian, and students will share in the responsibility for improved student academic achievement. The district must provide a copy of the revised distributed school-parent compacts to the NJDOE for review.
NEPTUNE TOWNSHIP SCHOOL DISTRICT
CONSOLIDATED MONITORING REPORT
MARCH 2016

Finding 5: The district was unable to provide documentation that it performed due diligence in engaging the consultation process for equitable services to resident nonpublic school students. Per the legislative requirement, consultation with nonpublic schools must be a formalized process that includes discussion of the criteria for the selection/identification of students. Also, the district must retain documentation of the consultation process (e.g., agendas, sign in sheets, and meeting minutes).

Citation: ESEA §1120(b): Participation of Children Enrolled in Private Schools (Consultation).

Required Action: For FY 2015-2016, the district must immediately engage in a formalized consultation process with nonpublic schools that enroll resident students. The process must include discussion on and confirmation of the established criteria to identify students for services. Additionally, the district must retain documentation (e.g., letters/flyers, meeting minutes, and sign in sheets) from the consultation meetings and submit this documentation to the NJDOE for review.

Finding 6: The district’s expenditure of funds for equitable services to resident nonpublic schools may benefit only participating students residing in the district, not the entire school. Thusly, the following expenditures for equitable services are unallowable:

<table>
<thead>
<tr>
<th>Item</th>
<th>Description</th>
<th>Amount</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>McGraw Hill School Education (PO #16-01924)</td>
<td>$5,279.14</td>
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<tr>
<td>2</td>
<td>Nessy Learning (PO #16-02087)</td>
<td>$840.00</td>
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<tr>
<td></td>
<td>Total</td>
<td>$6,119.14</td>
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</table>

Citation: 34 CFR 200.66: Requirements to ensure that funds do not benefit a private school. ESEA §1120(b)(1)(A-H): Participation of Children Enrolled in Private Schools (Consultation).

Required Action: The district must reverse the disallowed charges and provide documentation of the adjusting journal entry to the NJDOE for review.

Finding 7: The district was unable to provide documentation that one of its paraprofessional’s assigned to a Title I schoolwide program met the legislative requirement.

Citation: ESEA §1114(b)(1)(C-D): Schoolwide Programs (Components of a Schoolwide Program – In General). ESEA §1119(a)(1) and (c)(1)(A-G): Qualifications for Teachers and Paraprofessionals.

Required Action: The district must submit documentation to the NJDOE that the paraprofessional in question to the Title I schoolwide program meets one of the following criteria:

- completed at least two years of study at an institution of higher education;
NEPTUNE TOWNSHIP SCHOOL DISTRICT
CONSOLIDATED MONITORING REPORT
MARCH 2016

- obtained an associate’s degree (or higher); or
- achieved a passing score on the ETS ParaPro Assessment.

**Finding 8:** The district was unable to provide documentation as to how services under its Title I reserve rendered to identified homeless students were provided and tracked. Funds may be used to provide services to provide additional supports to students experiencing homelessness, not typically allowed to other children receiving Title I services.


**Required Action:** The district must conduct a needs assessment to coordinate services provided under McKinney-Vento and Title I to ensure that it provides the needed supports to identified students experiencing homelessness. Additionally, the district must provide documentation of the service(s) provided to include a mechanism to track and account for its Homeless Student reserve listed in the ESEA/NCLB Consolidated Application in the EWEG System. The district must submit evidence to the NJDOE for review.

**Title II**

**Finding 9:** The district charged the FY 2014-2015 Title II grant $348.50 (PO# 15-01060) for a monthly subscription to the Title I Monitor newsletter. The newsletter benefits the Title I program; as a result, the associated costs are not allocable to the Title II program.

**Citation:** 2 CFR §200.405: Basic considerations (Allocable costs).

**Required Action:** The district must reverse the disallowed charge and submit documentation of the adjusting entry to the NJDOE for review.

**Title III**

**Finding 10:** The district’s use of Title III funds for a one-year subscription to Title I Monitor Newsletter totaling $248.50 (PO# 16-01388) supplanted state/local funds.

**Citation:** ESEA §3115(g): Subgrants to Eligible Entities (Supplement, not Supplant).

**Required Action:** The district must reverse the disallowed charge and submit documentation of the adjusting entry to the NJ DOE for review.

**Finding 11:** The district’s Title III parental notification letter did not include the following elements:
NEPTUNE TOWNSHIP SCHOOL DISTRICT
CONSOLIDATED MONITORING REPORT
MARCH 2016

- a description of the method of instruction that will be used to serve the ELL, including a description of other methods of instruction available and how those methods differ in content and instructional goals;
- how the instructional program will meet the objectives of an IEP of a child with a disability including services in the student's IEP (as applicable);
- program exit requirements; and
- information on how parents of ELLs can become involved in the education of their children and how they can participate in helping their children learn English, achieve at high levels in the core academic subjects and meet state standards.

Citation: ESEA §3302 Parental Notification.

Required Action: The district must revise the parental notification letter to meet all the required legislative components and submit a copy of the revised letter to the NJ DOE for review. This information is located on the department's website at the following link: http://www.nj.gov/education/bilingual/title3/accountability/notification/notification.doc.

IDEA (Special Education)

Finding 12: The district did not consistently ensure the required participants were in attendance at identification, reevaluation planning, eligibility, and annual review IEP meetings for students referred and/or eligible for special education and related services and for students referred and/or eligible for speech-language services.

Citation: N.J.A.C. 6A:14-2.3(k). 20 U.S.C. §1414(b) (1). 34 CFR §300.304(a).

Required Action: The district must ensure that 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 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, including the sign in sheets, for meetings conducted between October 2016 and January 2017, and to review the oversight procedures.

Finding 13: The district did not consistently conduct meetings within 20 calendar days of receipt of a written request for a speech-language evaluation to determine if an evaluation was warranted.

Citation: N.J.A.C. 6A:14-3.3(e) and 3.4(j).

Required Action: The district must ensure identification meetings are conducted within 20 calendar days of receipt of a written request for evaluation. In order to demonstrate
NEPTUNE TOWNSHIP SCHOOL DISTRICT
CONSOLIDATED MONITORING REPORT
MARCH 2016

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 documentation from meetings held between October 2016 and January 2017, and to review the oversight procedures.

Finding 14: The district did not consistently conduct reevaluations within three years of the previous classification date for students eligible for speech-language services.


Required Action: The district must ensure reevaluations are conducted within required timelines. In order to demonstrate correction of noncompliance, the school 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 documentation of eligibility meetings held as part of the reevaluation process held between October 2016 and January 2017, and to review the oversight procedures.

Finding 15: The district did not consistently conduct multi-disciplinary initial evaluations for students referred for speech-language services by obtaining an educational impact statement from the classroom teacher.

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

Required Action: The district must ensure that a multidisciplinary evaluation is conducted for students referred for speech-language services by obtaining a statement from the general education teacher that details the educational impact of the speech problem on the student’s progress in general education. 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 initial evaluation reports for students referred for speech-language services whose eligibility meetings were held between October 2016 and January 2017, and to review the oversight procedures.

Finding 16: 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. Specifically, evaluation reports did not consistently include the observation of the student in other than a testing setting and interviews with the student’s parent and teacher.

Citation: N.J.A.C. 6A:14-3.4(f) 4(i-vi). 20 U.S.C. §§1412(a)(6)(b) and 1414(b)(1)-(3). 34 CFR 300.304(b)(1).
NEPTUNE TOWNSHIP SCHOOL DISTRICT
CONSOLIDATED MONITORING REPORT
MARCH 2016

Required Action: The district must ensure that all components of the functional assessment are conducted as part of the initial evaluation process. In order to demonstrate correction of noncompliance, the district must conduct training for child study team members and 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 initial evaluation reports for students whose eligibility meetings were held between October 2016 and January 2017, and to review the oversight procedures.

Finding 17: The district did not consistently obtain written parental consent to conduct initial evaluation assessments for students referred for special education and related services and for students referred for speech-language services.


Required Action: The district must ensure that informed parental consent is obtained and maintained in student files. In order to demonstrate correction of noncompliance, the district must conduct training for child study team members and 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 written parental consent to conduct assessments for students referred for special education and related services or speech-language services whose eligibility meetings were held between October 2016 and January 2017, and to review the oversight procedures.

Finding 18: The district did not consistently obtain written parental consent or document efforts to obtain written parental consent to conduct assessments as part of a reevaluation of students eligible for speech-language services.


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 written parental consent to conduct assessments as part of a reevaluation for students eligible for speech-language services whose eligibility meetings were held between October 2016 and January 2017, and to review the oversight procedures.
Finding 19: The district did not consistently document in the IEPs of students removed from the general education setting for more than 20 percent of the school day, consideration of placement in the least restrictive environment. Specifically, IEPs did not consistently include:

- the supplementary aids and services considered;
- an explanation of why the supplementary aids and services were rejected; and
- for those students placed in separate settings, activities to transition the student to a less restrictive environment.

Citation: N.J.A.C. 6A:14-4.2(a) 8(i-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 that 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 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 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, along with a random sample of IEPs for students whose annual review meetings were conducted between October 2016 and January 2017, 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 20: The district issued purchase orders for professional services without competitive contracting.


Required Action: The district should review applicable regulations and use open and competitive procedures as required. The district should also analyze and include documentation in its files that demonstrates the district ensured the costs were reasonable.

Finding 21: The district used IDEA funds to pay invoices from Monmouth-Ocean Educational Services Commission (MOESC) that were not adequately supported by records from the service provider. In particular, the monthly invoices reflected amounts for payroll related costs and administrative fees without adequate records detailing how the figures were derived and/or listings of dates, times, location, specific services and students served. Additionally, the rate charged for the administrative fee was not agreed upon under the terms of the district’s contract with MOESC.

Required Action: The district must review all charges to the FY 2015-2016 IDEA grant and reverse all charges that are beyond the scope of the contract and/or unsubstantiated. In addition, the district should: a) conduct a comprehensive review of its contractual obligations with nonpublic service providers; b) establish policies and procedures to ensure that accurate, underlying records from the providers are maintained; and c) require and keep evidence of student attendance. Further, nonpublic service providers contracts executed in the future should require student attendance data and payment authorization should be contingent upon the submission of appropriate documentation.

Administrative

Finding 22: On several occasions, the district failed to issue a purchase order prior to services being rendered (confirming order) in contravention of state regulations. It is imperative that purchase orders are issued by the purchasing agent to: authorize vendors to provide goods and perform services to the district; reduce the duplication of items and services acquired; and avoid the likelihood of overpayment to vendors.

Citation: N.J.S.A. 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 Kathryn Holbrook via phone at (609) 292-0198 or via email at kathryn.holbrook@doe.state.nj.us.
Board of Education Response:

Pursuant to N.J.A.C. 6A:23A-5.6, the following actions shall occur:

(a) Any school district or county vocational school district that has been subject to an audit or investigation by the Department of Education, Office of Fiscal Accountability and Compliance (OFAC) shall discuss the findings of the audit or investigation at a public meeting of the district board of education no later than 30 days after receipt of the findings.

(b) Within 30 days of the public meeting required in (a) above, the district board of education shall adopt a resolution certifying that the findings were discussed in a public board meeting and approving a corrective action plan to address the issues raised in the findings. The resolution shall be submitted to the OFAC within 10 days of adoption by the board of education.

(c) The findings of the OFAC audit or investigation and the board of education’s corrective action plan shall be posted on the district’s web site, if one exists.

If the board of education disputes any of the findings of the audit or investigation, it may file a written appeal with the OFAC of any disputed finding(s) within 10 days of adoption of the resolution. Seeking an appeal of the findings does not preclude adherence to the provisions of (a), (b), and (c) listed above.

Corrective Action Plan:

The corrective action plan is to be used when the LEA/Agency is in agreement with any of the findings. To contest a finding, the appeal process must be used. After the appeal is settled, a corrective action plan must be filed for any finding upheld during the appeal process.

The corrective action plan must be prepared by completing the attached form. The LEA/Agency must submit the following information:

- Recommendation number
- Corrective action (approved by the board)
- Method of implementation
- Person responsible for implementation
- Completion date of implementation
If the corrective action plan is acceptable, a letter will be sent to the LEA/Agency indicating that it has been accepted.

If the corrective action plan is not acceptable, a letter will be sent to the LEA/Agency indicating whether further clarification is required or further action is necessary.

Appeal Process:

The appeal process is used to contest disputed findings.

Within 10 days of the board's adoption of the resolution approving an appeal of the findings of the audit or investigation, a written request by the LEA/Agency to review the disputed finding(s), recommendation(s), or questioned costs must be submitted to the OFAC Director. The Request for Appeal must indicate the finding(s) in question.

The Request for Appeal must be in writing and the LEA/Agency must present any supporting documentation for the appeal. Subsequent to the submission of the Request for Appeal, the OFAC Director will issue a written decision.

If the final determination made by the Director, is still unsatisfactory to the LEA/Agency, the LEA/Agency may file a Petition of Appeal pursuant to N.J.A.C. 6A:3-1.3.
NEW JERSEY DEPARTMENT OF EDUCATION  
OFFICE OF FISCAL ACCOUNTABILITY AND COMPLIANCE  
CORRECTIVE ACTION PLAN

SCHOOL DISTRICT NAME: NEPTUNE TOWNSHIP SCHOOL DISTRICT  
COUNTY: MONMOUTH

TYPE OF EXAMINATION: CONSOLIDATED MONITORING OF TITLE I, TITLE II, TITLE III & IDEA

DATE OF BOARD MEETING: APRIL 27, 2016

CONTACT PERSON: DR. TAMI R. CRADER

TELEPHONE NUMBER: 732.776.2200  
FAX NUMBER: 732.897.7595

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<th>METHOD OF IMPLEMENTATION</th>
<th>INDIVIDUAL RESPONSIBLE FOR IMPLEMENTATION</th>
<th>COMPLETION DATE OF IMPLEMENTATION</th>
</tr>
</thead>
<tbody>
<tr>
<td>Finding #1</td>
<td>The district will revise its FY 2015-2016 ESEA application on the Electronic Web-Enabled Grant System (EWEG), properly reflecting the Neptune High School’s exclusion from this grant funding.</td>
<td>The Office of Grants Mgt (OGM) will be contacted to open the grant application to enable this correction.</td>
<td>Bus. Administrator / Board Secretary</td>
<td>April 28, 2016</td>
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Chief School Administrator  
4-28-16  
Date

Board Secretary/Business Administrator  
4/28/16  
Date
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<th>RECOMMENDATION NUMBER</th>
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<th>COMPLETION DATE OF IMPLEMENTATION</th>
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<tbody>
<tr>
<td>Finding #2</td>
<td>The district will ensure that the annual Parent’s Right-to-Know Letter is accurately dated to verify when the letter is distributed to parents/guardians.</td>
<td>Email/hard copy letters, as well as posted on website for 2016-2017.</td>
<td>Principals</td>
<td>September 2016</td>
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Pam D'Amato
Chief School Administrator
4-28-16
Date

J. D. Leonard
Board Secretary/Business Administrator
1/28/16
Date
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<tr>
<th>RECOMMENDATION NUMBER</th>
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<th>COMPLETION DATE</th>
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<tr>
<td>Finding #3</td>
<td>The district will retain documentation for FY 2016-2017 of the annual Title I parent meeting (in printed form and website) for each Title I school.</td>
<td>Hard copy letters, as well as posted on website for 2016-2017.</td>
<td>Principals</td>
<td>September 2016</td>
</tr>
</tbody>
</table>

Date: 4/28/16

Signature: [Signature]

Board Secretary Business Administrator

Date: 4/28-16

Signature: [Signature]

Chief School Administrator
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<tbody>
<tr>
<td>Finding #4</td>
<td>Green Grove and Midtown Community (formerly Ridge Avenue) schools will revise and distribute its Title I school-parent compacts to the students and parents that reflect all of the legislative requirements by including how the school, parent/guardian, and students will share in the responsibility for improved student academic achievement.</td>
<td>Hard copy</td>
<td>Principals</td>
<td>April 29, 2016</td>
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Signed:

Samuel, Kofun

Chief School Administrator

Date: 4/28/16

Lisa Brown

Board Secretary/Business Administrator

Date: 4/28/16
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<th>COMPLETION DATE OF IMPLEMENTATION</th>
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<tbody>
<tr>
<td>Finding #5</td>
<td>The district will hold formalized consultations with nonpublic schools and identify criteria to identify students for services.</td>
<td>Letter, sign-in sheets, meeting minutes</td>
<td>Grant Coordinator</td>
<td>June 30, 2016</td>
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Chief School Administrator  
4-18-16  

Board Secretary/Business Administrator  
4/28/16
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<tbody>
<tr>
<td>Finding #6</td>
<td>The district will reverse identified educational expenditures made under the FY '15-'16 Title I nonpublic allocation as they may benefit non-eligible students. Documentation of these adjustments will be sent to the NJDOE for review.</td>
<td>Disbursement adjustments will be made and available for audit review.</td>
<td>Bus. Administrator / Board Secretary</td>
<td>April 28, 2016</td>
</tr>
<tr>
<td>RECOMMENDATION NUMBER</td>
<td>CORRECTIVE ACTION</td>
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<tr>
<td>Finding #7</td>
<td>The district will provide required documentation of paraprofessional's qualifications</td>
<td>Via mail</td>
<td>Superintendent</td>
<td>Upon return of staff member from medical leave</td>
</tr>
</tbody>
</table>

Signed:

Sam X. Lamke
Chief School Administrator

Date: 4-28-16

L.J. Hernandez
Board Secretary/Business Administrator

Date: 4/28/16
<table>
<thead>
<tr>
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</thead>
<tbody>
<tr>
<td>Finding #8</td>
<td>The district will conduct a needs assessment of its identified homeless students and develop a clear mechanism to track and account for the funding of those services that are charged to the ESEA Title I homeless reserve accounts.</td>
<td>Disbursement adjustments will be made and available for audit review.</td>
<td>Grant Coordinator; Bus. Administrator / Board Secretary; Homeless Liaison.</td>
<td>April 28, 2016</td>
</tr>
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<tr>
<td>Finding #9</td>
<td>The district will reclassify Title II FY 2014-2015 expenditure for Title I newsletter into the proper Title I account. Documentation of correction will be sent to the NJDOE.</td>
<td>Disbursement adjustments will be made and available for audit review.</td>
<td>Bus. Administrator / Board Secretary</td>
<td>April 28, 2016</td>
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<tr>
<td>Finding #10</td>
<td>The district will reclassify Title III FY 2015-2016 expenditure for Title I newsletter into the proper Title I account. Documentation of correction will be sent to the NJDOE</td>
<td>Disbursement adjustments will be made and available for audit review.</td>
<td>Bus. Administrator / Board Secretary</td>
<td>April 28, 2016</td>
</tr>
</tbody>
</table>

Chief School Administrator: [Signature]  
Date: 4/28/16

Board Secretary/Business Administrator: [Signature]  
Date: 4/28/16
## Corrective Action Plan

<table>
<thead>
<tr>
<th>Recommendation Number</th>
<th>Corrective Action</th>
<th>Method of Implementation</th>
<th>Individual Responsible for Implementation</th>
<th>Completion Date of Implementation</th>
</tr>
</thead>
</table>
| Finding #11           | The district will revise the parental notification letter in order to meet all required legislative components. The letter will include the following elements:  
- A description of the method of instruction that will be used to serve the ELL population, including a description of other methods of instruction available and how those methods differ in content and instructional goals.  
- How the instructional program will meet the objectives of an IEP of a child with a disability including services in the student’s IEP (as applicable).  
- Program exit information.  
- Information on how parents of ELLs can become involved in the education of their children and how they can participate in helping their children learn English, achieve at higher levels in the core academic subjects and meet state standards. | Revised parental notification letter effective April 2016 | Director of Special Services | April 28, 2016 |

---

**Chief School Administrator**

**Date**

**Board Secretary/Business Administrator**

**Date**
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<tbody>
<tr>
<td>Finding #12</td>
<td>Ensure that substitute teachers are obtained on a consistent basis so that there is coverage for the required participants to attend identification, reevaluation planning, and annual review IEP meetings for students referred and/or are eligible for special education and related services and for students referred and/or eligible for speech-language services. Ensure that if substitutes are not available, building administration assign coverage for necessary members to be in attendance at meetings. All Case Managers will follow requirements of attendance at specific meetings and will obtain written parental consent to excuse team members when necessary.</td>
<td>Create substitute/coverage plan with personnel department and building administration. Training Child Study Team</td>
<td>Director of Special Services Assistant Superintendent in charge of personnel Chairperson of Special Services</td>
<td>April 2016/ Ongoing Monthly CST meetings Monthly Speech meetings</td>
</tr>
</tbody>
</table>

Chief School Administrator 4/28/16
Board Secretary/Business Administrator 4/28/16
# NEW JERSEY DEPARTMENT OF EDUCATION

**OFFICE OF FISCAL ACCOUNTABILITY AND COMPLIANCE**

**CORRECTIVE ACTION PLAN**

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<tr>
<td>Finding #13</td>
<td>Ensure that the Speech Department, Department Chairperson of Special Services and Special Services secretarial staff and the district are compliant on code requirements for holding consistent speech identification meetings within 20 calendar days of the receipt of the written request for a speech-language evaluation. A district referral/initial/reevaluation timeline tracking tool will be created for use by both CST and Speech Departments. CST, Speech personnel, Chairperson of Special Services, and Special Services secretarial staff will be knowledgeable on how to utilize the checklist in order to ensure compliance of code timeline requirements.</td>
<td>Speech personnel training</td>
<td>Director of Special Services</td>
<td>April 2016 Monthly meetings Ongoing</td>
</tr>
</tbody>
</table>

**Signatures**

- **Chief School Administrator**: [Signature]
  - Date: 4/25/16
- **Board Secretary/Business Administrator**: [Signature]
  - Date: 4/25/16
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<tbody>
<tr>
<td>Finding #14</td>
<td>The Speech Department will follow code requirements for holding consistent speech</td>
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<td>reevaluation meetings within required timelines.</td>
<td>Speech personnel training</td>
<td>Director of Special Services</td>
<td>April 2016/ Ongoing</td>
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<tr>
<td></td>
<td>A district referral/initial/reevaluation timeline tracking tool will be created</td>
<td>Training of Special Services Department Chairperson</td>
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<td></td>
<td>for use by both CST and Speech Departments. CST, Speech personnel, Chairperson of</td>
<td>Training of Special Services Secretarial Staff</td>
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<td></td>
<td>Special Services, and Special Services secretarial staff will be trained how to</td>
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<td></td>
<td>utilize the checklist in order to ensure compliance of code timeline requirements.</td>
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Chief School Administrator: 4/28/16

Board Secretary/Business Administrator: 4/28/16
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<tr>
<td>Finding #15</td>
<td>The Speech staff will follow the code requirements for conducting multi-disciplinary initial evaluations for students referred for speech language services. The staff will obtain a statement from the general education teacher that details the educational impact of the speech problem on the student's progress in general education. Training will include administrative oversight and attendance at initial speech meetings.</td>
<td>Training the Speech Department on code requirements for conducting multi-disciplinary initial evaluations.</td>
<td>Director of Special Services Chairperson of Special Services</td>
<td>April 2016 Monthly meetings Ongoing</td>
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Chief School Administrator 4/28/16 Board Secretary/Business Administrator 4/28/16
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<tr>
<td>Finding #16</td>
<td>The Child Study Team and Speech personnel will consistently conduct functional assessments as a component of initial evaluations for students referred for special education and related services or speech-language services. A district referral/initial/reevaluation timeline tracking tool will be created for use by both CST and Speech Departments. CST, Speech personnel, Chairperson of Special Services, and Special Services secretarial staff will be trained how to utilize the checklist in order to ensure compliance of code timeline requirements.</td>
<td>Training for CST and Speech Staff on code requirements for consistently conducting and including functional assessments as a component of initial evaluations.</td>
<td>Director of Special Services</td>
<td>April 2016 Monthly meetings Ongoing</td>
</tr>
</tbody>
</table>

Chief School Administrator  
4-18-16  
Date

Board Secretary/Business Administrator  
4/28/16  
Date
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<tr>
<td>Finding #17</td>
<td>The Child Study Team and Speech Departments will consistently obtain written parental consent to conduct initial evaluation assessments for students who are either referred for special education and related services or speech-language services. The Child Study Team and Speech Departments will maintain the parental consent paperwork in each student's file.</td>
<td>Training for Special Services Staff on code requirements for consistently obtaining and correctly filing parental consent to evaluate documents.</td>
<td>Director of Special Services Chairperson of Special Services</td>
<td>April 2016 Monthly meetings Ongoing</td>
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**Chief School Administrator**

**Date**

**Board Secretary/Business Administrator**

**Date**
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<tr>
<td>Finding #18</td>
<td>The Speech Department will consistently obtain written parental consent or document efforts to obtain written parental consent to conduct assessments as part of a reevaluation of students eligible for speech-language services. The Speech Department will maintain the parental consent paperwork or documentation of effort to obtain parental consent paperwork for conducting a reevaluation in each student’s file.</td>
<td>Training for Speech personnel on code requirements for consistently obtaining and correctly filing parental consent to reevaluate documents. If no parental consent was obtained then documentation of the efforts to obtain the parental consent need to be in each student’s file.</td>
<td>Director of Special Services Chairperson of Special Services</td>
<td>April 2016 Monthly meetings Ongoing</td>
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| Finding #19           | Child Study Team personnel will consistently document in IEPs for students removed from the general education setting for more than 20% of the school day, consideration of placement in the least restrictive environment. IEPs will consistently include the following:  
  - The supplementary aids and services considered.  
  - An explanation of why the supplementary aids and services were rejected.  
  - Activities to transition the student to a less restrictive environment.  
  Providing CST with model LRE statements and transition statements.  
  The Child Study Team will conduct annual review meetings to correct any noncompliant IEPs once this list of students is provided by the monitor. | Training for Special Services Staff on code requirements for consistently documenting appropriate LRE statements. | Director of Special Services              | IEPs corrected no later than October 2016 or as soon as the list of noncompliant students is provided by the monitors. |

Chief School Administrator
Date

Board Secretary/Business Administrator
Date
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<tr>
<td>Finding #20</td>
<td>The district will continue to review and evaluate its use of professional consultant services annually to determine and ensure that they are open and competitive as required.</td>
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<th>COMPLETION DATE OF IMPLEMENTATION</th>
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<tr>
<td>June 30, 2016 and ongoing</td>
<td>Bus. Administrator / Board Secretary; Director of Special Services</td>
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<tr>
<td>Annual reviews undertaken and competitive contracts issued as appropriate; PO files to reflect steps to ensure costs are reasonable for requested services.</td>
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<tr>
<td>Finding #21</td>
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Chief School Administrator

Date

Board Secretary/Business Administrator

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<tbody>
<tr>
<td>Finding #22</td>
<td>Administrative</td>
<td>Continued reminders to district staff as well as notification to vendors</td>
<td>Bus. Administrator / Board Secretary &amp; Superintendent of Schools</td>
<td>April 28, 2016</td>
</tr>
</tbody>
</table>

Chief School Administrator

Date

Board Secretary/Business Administrator

Date