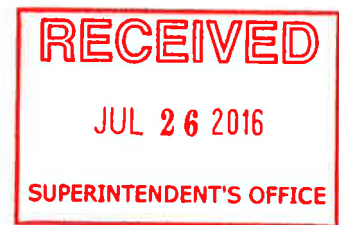




State of New Jersey

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



CHRIS CHRISTIE
Governor

KIM GUADAGNO
Lt. Governor

DAVID C. HESPE
Commissioner

July 19, 2016

Mr. Anthony Grieco
Chief School Administrator
Elmwood Park School District
60 East 53rd Street
Elmwood Park, NJ 07407

Dear Ms. Grieco:

The New Jersey Department of Education has completed a review of funds received and disbursed from one or more federal programs by the **Elmwood 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, 2014 through January 31, 2016. 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/compliance/monitor/>.

Utilizing the process outlined in the attached "Procedures for LEA/Agency Response, Corrective Action Plan and Appeal Process," the Elmwood 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:Elmwood Park BOE CM Cover Letter
Enclosures

Distribution List

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ELMWOOD PARK BOARD OF EDUCATION
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New Jersey K-12 Education

CONSOLIDATED MONITORING REPORT
JULY 2016

District: Elmwood Park Public Schools
County: Bergen
Dates On-Site: February 23, 24 and 25, 2016
Case #: CM-007-15

FUNDING SOURCES

Program	Funding Award
Title I, Part A	\$684,465
IDEA Basic	649,189
IDEA Preschool	22,152
Title II, Part A	82,465
Title III	19,872
Total Funds	<hr/> <u>\$1,458,143</u>

**ELMWOOD PARK PUBLIC SCHOOLS
CONSOLIDATED MONITORING REPORT
JULY 2016**

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 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 Elmwood 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, Part A (Title I); Title II, Part A (Title II); Title III; and IDEA Basic and Preschool for the period July 1, 2014 through January 31, 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, 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 reviewed included Title I, Title II, Title III, and IDEA Basic and Preschool from July 1, 2014 through January 31, 2016. 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

The district used Title I funds to serve two of the five schools in the district – Elmwood Park Memorial Middle School and Sixteenth Avenue Elementary School. Elmwood Park Memorial Middle School is a Focus school and conducts a Title I schoolwide program. Sixteenth Avenue Elementary School operates a Title I targeted assistance program. At the time of the on-site visit, the district budgeted its Title I funding for costs such as, but not limited to, priority/focus interventions, instructional salaries and benefits, and instructional materials/supplies.

IDEA Projects

The district used the FY 2014-2015 and FY 2015-2016 IDEA Basic and Preschool funds to reduce district tuition costs for students receiving special educational services in other public school districts and approved private schools for students with disabilities. Funds were also used for the provision of related services to students with disabilities in nonpublic settings.

DETAILED FINDINGS AND RECOMMENDATIONS

Title I

Finding 1: The district did not implement a Title I targeted assistance program at the Sixteenth Avenue Elementary School. As such, the specific requirements for a Title I targeted assistance program such as using multiple, objective academically related entrance and exit criteria for Title I student identification and the parent participation letter explaining the Title I program were not fulfilled. Also, the FY 2015-2016 ESEA Consolidated Subgrant Application reflected only the budgeted Title I costs for Elmwood Park Memorial Middle School, and not costs for the Sixteenth Avenue Elementary School.

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

Required Action: The district must revisit the needs of the Sixteenth Avenue Elementary School and the overall district to determine how to proceed with Title I funding and services that is in the best interest of the Title I eligible students. Based on that determination, the district may need to amend the FY 2015-2016 ESEA Consolidated Subgrant Application to reflect allowable Title I services and costs to ensure that the application reflects the programs implemented at the indicated school(s). Additionally, the district may need to develop the required entrance and exit criteria, and develop and distribute the Title I parent participation letter. If applicable, the district must provide copies for FY 2016-2017 to the NJDOE for review.

**ELMWOOD PARK PUBLIC SCHOOLS
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Finding 2: The district did not align the Needs Assessment in the amended FY 2015-2016 ESEA Consolidated Subgrant Application to reflect all of the identified district's Title I funded priority problems, including those represented in the School Improvement Plan (SIP).

Citation: ESEA §1112: *Local Educational Agency Plans.*

Required Action: The district must amend the FY 2015-2016 ESEA Consolidated Subgrant Application to revise the Needs Assessment to accurately reflect and align with the needs of the district students, staff and program implementation and use of the district's Title I funds.

Finding 3: The district did not have a parental involvement program that reflected the requirements of Title I. There was no evidence the district's Title I parental involvement policy was reviewed and board adopted since January 2010, and no evidence of current Title I school-level parental involvement policies. The annual review and current board adoption allow parents and other stakeholders to impact the parental involvement process and identify the unique needs of the Title I schools and parents of the Title I students.

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

Required Action: For FY 2016-2017, the district must have a written district parental involvement policy evaluated annually with current board adoption along with current school-level parental involvement policies. Title I parents/guardians must be included in the development processes. Copies of recent board approved district and school-level parental involvement policies must be submitted to the NJDOE for review. Evidence of parental input into the development of the Title I parental involvement policies must be documented with meeting agendas, sign in sheets and minutes.

Finding 4: For FY 2015-2016, the district provided evidence of school-parent compacts for the Elmwood Park Memorial Middle School, but did not provide school-parent compacts for the Sixteenth Avenue Elementary School.

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

Required Action: For FY 2016-2017, the district must develop school-parent compacts for each Title I school and document the inclusion of Title I parents/guardians in the development process.

Finding 5: For FY 2015-2016, the district provided insufficient evidence that its Title I schools convened an annual Title I parent/guardian meeting that met the legislative requirements at each of its Title I schools. An annual parent/guardian meeting for the Sixteenth Avenue Elementary School was not conducted, and the "Title I Parent Meeting" at the Elmwood Park Memorial Middle School occurred on February 16, 2016, which was late in the school year. Not

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JULY 2016**

conducting an annual meeting at the beginning of the year to explain the Title I legislation and the district's Title I programs at each school and to all parents, did not allow parents to be informed and vested in the Title I process from the start.

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

Required Action: The district's Title I schools must convene and sufficiently document their FY 2016-2017 annual Title I school meetings for the parents/guardians of the participating Title I students no later than mid-October. The district must submit evidence of the annual meetings (e.g., invitational letter/flyer, agenda, meeting minutes, and sign in sheets) to the NJDOE for review.

Finding 6: The Parents' Right-to-Know Highly Qualified Teacher (HQT) letter was not sent to Sixteenth Avenue Elementary Schools parents and the Parents' Right-to-Know HQT letter dated February 8, 2016 was sent late in the school year to Elmwood Park Memorial Middle School parents. The Parents' Right-to-Know letter informs all parents in those Title I schools of their right to ask about the qualifications of their child's teacher and must be distributed early in the school year.

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

Required Action: The district must develop the Parents' Right-to-Know HQT letter for each Title I school and distribute it to all the parents of students in the Title I schools.

Finding 7: The Schoolwide Stakeholder Engagement Committee representation at the Elmwood Park Middle Memorial School did not include at least one community member and one parent representative not affiliated with the district's board of education. Also, the Schoolwide Stakeholder Engagement Committee meetings identified were limited to one meeting in April and one in May instead of meetings occurring throughout the project period.

Citation: ESEA §1114(b): *Schoolwide Programs (Components of a Schoolwide Program)*.

Required Action: The district's Title I Schoolwide Stakeholder Engagement Committee must be expanded to include the aforementioned representatives. The Title I Schoolwide Stakeholder Engagement Committees need to meet at a minimum on a quarterly basis. The district must send to the NJDOE for review an updated list of the stakeholder committee members including the person's name and associated constituent group.

Finding 8: In the FY 2015-2016 ESEA Consolidated Subgrant Application on the Title I, Part A Eligibility – Step 1 tab, the district included nonpublic enrollment counts, and zero low-income counts based on data from nonpublic schools within the attendance area only. The district did not conduct outreach to nonpublic schools within a 25 mile radius that enroll resident students outside the attendance area. Additionally, the district did not provide evidence of outreach to both the nonpublic schools within and outside the attendance areas to support either counts

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indicated in the FY 2015-2016 ESEA Consolidated Subgrant Application. Due to the zero counts of low-income nonpublic student, the district did not reserve any Title I funds for equitable services to eligible nonpublic school students.

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

Required Action: For FY 2016-2017, the district must contact and document the outreach to nonpublic schools both inside and outside the attendance area that enroll district resident students to generate accurate nonpublic enrollment and to gather low-income nonpublic student data. In addition, the district must begin the consultation process with the nonpublic schools to identify eligible Title I students and develop a service delivery plan. The district must send documentation of the consultation process (e.g., invitational letters, agendas, meeting notes, sign in sheets) to the NJDOE for review.

Finding 9: The district's use of FY 2015-2016 Title I funds to pay for the salaries and benefits of the five split funded (60 percent Title I and 40 percent state/local) teachers at the Elmwood Park Memorial Middle School supplanted state/local funds because these teachers were the sole classroom teachers. Title I funds may be used for teachers to provide additional instructional support and these teachers cannot serve as the main classroom teachers.

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

Required Action: The district must reverse the Title I portion of the costs for the aforementioned teachers' salaries and benefits and allocate state/local funds for those costs. The district must provide evidence of the journal entry to reverse the expenditures to the NJDOE for review.

Finding 10: The district did not budget the costs for the Epson Projectors (\$76,656.79) as instructional equipment (400-731) despite the unit cost meeting the requirements for the equipment threshold of \$2,000.

Citation: ESEA §1112: *Local Educational Agency Plans.*

Required Action: The district must amend the FY 2015-2016 ESEA Consolidated Subgrant Application to reflect the costs for the Epson Projectors as instructional equipment.

Finding 11: The School Improvement Plan (SIP) including priority/focus costs were not reflective of the school-level allocation for the Elmwood Park Memorial Middle School. Instead, the SIP reflected only the priority/focus intervention reserve, which is a district-level allocation.

Citation: ESEA §1112: *Local Educational Agency Plans;* ESEA §1120A(b): *Fiscal Requirements (Federal Funds to Supplement, Not Supplant, Non-Federal Funds).*

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Required Action: For FY 2016-2017, the district must work with its respective Regional Achievement Center to accurately reflect budgeted school-level costs and initiatives in the SIP.

Finding 12: The Title I Parental Involvement Reserve of \$11,894 indicated on Title I Eligibility - Step 4 of the district's amended FY 2015-2016 ESEA Consolidated Subgrant Application was not itemized at the school-level on the Parent Involvement – School Allocations tab. Not including the school-level amount(s) did not allow for verification that 95 percent of the district reserve is budgeted and expended at the school-level.

Citation: ESEA §1118(a)(3)(C): *Parental Involvement (Local Educational Agency Policy Reservation)*; Uniform Guidance 2 CFR 200.302, Financial management.

Recommended Action: The district must include the amount(s) budgeted for school-level Title I parental involvement activities on the Parent Involvement – School Allocations tab in its amended FY 2015-2016 ESEA Consolidated Subgrant Application.

Title II

Finding 13: For FY 2015-2016, evidence showed that the district's Parents' Right-to-Know HQT letter, on district letterhead and posted on the district webpage, was dated February 8, 2016. This letter informs all parents of their right to ask about the qualifications of their child's teachers and must be distributed early in the school year.

Citation: ESEA §1119, §1111 Qualifications for Teachers and paraprofessionals; State Plans.

Required Action: The district must distribute the Parents' Right-to-Know letter no later than October 15th of the current school year to all parents.

Title III

Finding 14: The district's parental notification letter did not outline all of the Title III parent notification requirements. The district must ensure the notification letter fully meets the Title III Parental Notification Requirements, including:

- distributing the notification to parents in an understandable and uniform format and, to the extent practicable, in a language the parents understand;
- description of method of instruction that will be used to serve the English Language Learners (ELL);
- other methods of instruction and how those methods may differ in content and instructional goals, etc.; and
- expected rate of transition into classroom not tailored for ELL students.

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In addition, the district did not have an effective means of outreach to parents of ELL students.

Citation: ESEA §3302 *Parental Notification*.

Required Action: The district's Title III parental notification letter needs to fully describe all ELL program types and indicate the students' expected rate of transition into a mainstream classroom in a format understandable to the parent. The district must revise the notification letter and send a copy to the NJDOE for review. In addition, the district must implement outreach activities to parents to help them participate in their children's education, and provide corresponding documentation to the NJDOE. For more information: <http://www.nj.gov/education/bilingual/title3/accountability/notification>.

IDEA (Special Education)

Finding 15: The district did not consistently provide notice of a meeting to parents of students referred and/or eligible for special education and related services and students referred and/or eligible for speech-language services.

Citation: N.J.A.C. 6A:14-2.3(k)3 and 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 and develop an oversight mechanism to ensure compliance with the requirements in the citations listed above. A monitor from the NJDOE will conduct an on-site visit to interview staff, review documentation for meetings conducted between October 2016 and January 2017, and to review the oversight procedures.

Finding 16: The district did not consistently convene meetings with required participants 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)1-2; 3.3(e); 20 U.S.C. §1414(d)(1)(B); and 34 CFR §300.321(a).

Required Action: The district must ensure meetings are conducted with required participants and documentation of participation is maintained in students' records. 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 citations 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.

**ELMWOOD PARK PUBLIC SCHOOLS
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Finding 17: 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 and for students referred for speech-language services.

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

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 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 conducted between October 2016 and January 2017, and to review the oversight procedures.

Finding 18: The district did not ensure child study team participation at the planning conferences of students transitioning from an early intervention program to preschool.

Citation: N.J.A.C. 6A:14-2.3(k)2(ix); 20 U.S.C. §1414(d)(1)(D); and 34 CFR §300.321(f).

Required Action: The district must ensure a member of the child study team participates in the planning conference for each student transitioning from early intervention to preschool. 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 citations listed above. A monitor from the NJDOE will conduct an on-site visit to interview staff, review documentation of child study team participation at the planning conferences of students transitioning from an early intervention program to preschool, conducted between October 2016 and January 2017, and to review the oversight procedures.

Finding 19: 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.

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 develop an oversight mechanism to ensure compliance with the requirements in the citations listed above. A monitor from the NJDOE will conduct an on-site visit to interview staff, review initial evaluation reports for students evaluated between October 2016 and January 2017, and to review the oversight procedures.

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Finding 20: The district did not consistently conduct multidisciplinary initial evaluations for students referred for special education and related services by conducting assessments by a minimum of two child study team members.

Citation: N.J.A.C. 6A:14-2.5(b)6 & 3.4(g)3.

Required Action: A minimum of two child study team members must administer assessments for students referred for special education and related services to ensure a multidisciplinary evaluation is conducted. 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 citations listed above. A monitor from the NJDOE will conduct an on-site visit to interview staff, review initial evaluation reports for students referred for special education and related services whose eligibility meetings were held between October 2016 and January 2017, and to review the oversight procedures.

Finding 21: The district did not consistently include required considerations and statements in each IEP for students eligible for special education and related services and for students eligible for speech-language services. Specifically, IEPs did not contain:

- statement of how the student's disability affects his/her involvement and progress in the general curriculum;
- measurable annual goal(s) and objective(s); and
- statement how progress towards annual goals will be measured.

Citation: N.J.A.C. 6A:14-3.7(c)1-10& e(2,3, and 7); and 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 the required considerations and statements. 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 citations listed above. To demonstrate the district has corrected the individual instances of noncompliance, the district must conduct annual review meetings and revise IEPs for specific student's 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 developed between October 2016 and January 2017, and to 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 22: The district did not consistently provide to students beginning at age 14, written invitations to meetings where post-school transition was being discussed.

Citation: N.J.A.C. 6A:14-2.3(k)2x; and 34 CFR §300.322(a)(2).

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Required Action: The district must ensure each student with an IEP age 14 or above is provided with a written invitation to any IEP meeting where transition to adult life will be discussed. 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 citations listed above. A monitor from NJDOE will conduct an on-site visit to interview staff, review copies of invitations to IEP meetings to students age 14 and above for meetings conducted between October 2016 and January 2017, and to review the oversight procedures.

Finding 23: The district did not consistently complete transition planning for students ages 14 and above and document decisions in the IEP.

IEPs for students age 14 did not include:

- a statement of the student's strengths, interests and preferences;
- a description of the need for consultation with other agencies, if applicable;
- the name or position of a staff person responsible to serve as liaison to post-secondary resources; and
- a statement of needed interagency linkages and responsibilities.

IEPs for students age 16 and above did not consistently include:

- postsecondary measurable goal in the IEP and updated annually;
- postsecondary goal(s) based on age appropriate transition assessment;
- transition services in the IEP;
- courses of study; and
- annual IEP goal(s) related to the student's transition services needs.

Citation: N.J.A.C. 6A:14-2.3(k)2(x), 5(2), 3.7(e)13), 3.7(e)11 and(h); 20 U.S.C. §1414 (d)(1)(A)(i)(1)(VIII); and 34 CFR §300.322.b(2).

Required Action: The district must ensure that beginning at age 14, all transition requirements are conducted. 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 citations 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 developed between October 2016 and January 2017, and to review the oversight procedures. The names of the students whose IEPs were identified as noncompliant will be provided to the district by the monitor.

**ELMWOOD PARK PUBLIC SCHOOLS
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Finding 24: The district did not consistently conduct reevaluations within three years of the previous classification date for students eligible for special education and related services and for students eligible for speech-language services.

Citation: N.J.A.C. 6A: 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 that reevaluations are conducted within required time lines with required participants in attendance. 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 citations 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 between October 2016 and January 2017, and to review the oversight procedures.

Finding 25: The district did not consistently provide to students eligible for special education and related services a summary of academic achievement and functional performance prior to graduating or exiting.

Citation: N.J.A.C. 6A:14-4.11(b)4; and 20 U.S.C. §1414(c)(5)(B); and 34 CFR §300.305(e)(3).

Required Action: The district must ensure a summary of academic achievement and functional performance is provided to parents or adult students prior to graduating or exiting. 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 citations listed above. A monitor from the NJDOE will conduct an on-site visit to interview staff, review copies of the summary of academic achievement and functional performance provided to students graduating or exiting at the conclusion of the school year, and to review the oversight procedures.

Administrative

Finding 26: The district charged some Title I salaries to the incorrect general ledger account. The salaries were incorrectly charged to account 100-320, Purchased Professional Services, rather than to a salary account.

Citation: *Uniform Minimum Chart of Accounts (Handbook 2R2).*

Required Action: The district should ensure that expenditures are charged to the appropriate general ledger account in accordance with the Uniform Minimum Chart of Accounts.

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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.

State of New Jersey
Department of Education
Office of Fiscal Accountability and Compliance

PROCEDURES FOR LEA/AGENCY RESPONSE
CORRECTIVE ACTION PLAN AND APPEAL PROCESS

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.

I:\tconaway\CAP Procedures\capformlea.docx
Attachment

**NEW JERSEY DEPARTMENT OF EDUCATION
OFFICE OF FISCAL ACCOUNTABILITY AND COMPLIANCE
CORRECTIVE ACTION PLAN**

SCHOOL DISTRICT NAME _____ COUNTY _____

TYPE OF EXAMINATION: _____

DATE OF BOARD MEETING: _____

CONTACT PERSON _____

TELEPHONE NUMBER _____ FAX NUMBER _____

RECOMMENDATION NUMBER	CORRECTIVE ACTION	METHOD OF IMPLEMENTATION	INDIVIDUAL RESPONSIBLE FOR IMPLEMENTATION	COMPLETION DATE OF IMPLEMENTATION
			INDIVIDUAL	COMPLETION

Chief School Administrator _____

Date _____

Board Secretary/Business Administrator _____

Date _____

**NEW JERSEY DEPARTMENT OF EDUCATION
OFFICE OF FISCAL ACCOUNTABILITY AND COMPLIANCE
CORRECTIVE ACTION PLAN**

RECOMMENDATION NUMBER	CORRECTIVE ACTION	METHOD OF IMPLEMENTATION	RESPONSIBLE FOR IMPLEMENTATION	DATE OF IMPLEMENTATION

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Date