

STATE OF NEW JERSEY
DEPARTMENT OF EDUCATION
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SCOTCH PLAINS-FANWOOD PUBLIC SCHOOLS
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New Jersey K-12 Education

CONSOLIDATED MONITORING REPORT
SEPTEMBER 2015

District: Scotch Plains-Fanwood Public Schools
County: Union
Dates On-Site: April 22, 2015
Case #: CM-041-14

FUNDING SOURCES

Program	Funding Award
Title I, Part A	\$ 110,541
Title II, Part A	72,612
IDEA Basic	1,295,481
IDEA Preschool	53,566
Total Funds	<u>\$ 1,532,200</u>

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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 Scotch Plains-Fanwood 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); and IDEA Basic and Preschool for the period July 1, 2013 through April 22, 2015.

The scope of work performed included the review of documentation including grant applications, program plans and needs assessments, grant awards, annual audits, board minutes, payroll records, accounting records, purchase orders, and current district policies and procedures. The monitoring team members reviewed the supporting documentation for a sample of expenditures and conducted internal control reviews, as well as conducted interviews with program administrators and other district personnel as required. Additionally, the IDEA grant review included a review of student records, classroom visitations and interviews with instructional staff to verify implementation of Individualized Education Programs (IEP), a review of student class and related service schedules, and interviews of child study team members and speech-language specialists.

EXPENDITURES REVIEWED

The grants that were reviewed included Title I, Title II, and IDEA Basic and Preschool for the period July 1, 2013 through April 22, 2015. A sampling of purchase orders was taken from the entire population and later identified as to the grant that was charged.

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GENERAL DISTRICT OVERVIEW OF USES OF TITLE I, TITLE II AND IDEA FUNDS

Title I

The district operates targeted assistance programs in its four Title I funded schools: School One Elementary School, Howard B. Brunner Elementary School, Park Middle School, and Evergreen Elementary School. The district identified Closing the Achievement Gap, Early Childhood Education, English Language Arts (ELA), and Mathematics for all students, racial/ethnic minorities and parents as priority problems.

Title II

The district used the Title II allocation for teacher professional development related to Brain research, ELA and reading strategies.

IDEA (Special Education)

The district used a majority of the FY 2014-2015 IDEA Basic funds to reduce district tuition costs for students receiving special educational services in approved private schools for students with disabilities. Funds were also used for the provision of related services for students with disabilities.

DETAILED FINDINGS AND RECOMMENDATIONS

Title I

Finding 1: The notification letters sent to the parents/guardians of identified Title I students did not include clearly defined entrance and exit criteria. The parents/guardians of identified Title I students must be informed of the multiple educationally related and developmentally appropriate criteria used to identify their child/children for Title I services.

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

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

Finding 2: The district was unable to provide evidence of the date the Title I written parental involvement policy was distributed. Per the legislative requirement, parents/guardians have a right to be involved in the development of the written parental involvement policy and how they can further engage in the academic performance and achievement of their children.

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

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Required Action: For the 2015-2016 school year, the district must ensure that it distributes the written parental involvement policy to all parents/guardians of identified Title I students in all four of its funded Title I schools. The district must submit evidence of distribution to the NJDOE for review.

Finding 3: The district was unable to provide documentation that its Title I schools formally convened the annual Title I parent meeting. In a Title I targeted assistance program, all parents/guardians of identified Title I students are entitled to be informed about the school's Title I program, legislative requirements, and how they can become actively engaged in helping their child/children succeed academically.

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

Required Action: For the 2015-2016 school year, each of the district's Title I schools must convene the annual Title I parent meeting for the parents/guardians of participating students. The district must submit documentation of each school's meeting (e.g., invitational letter/flyer, agenda, meeting minutes, sign in sheets) to the NJDOE for review.

Finding 4: The district provided documented evidence that its Title I schools distributed the Parents' Right-to-Know Letter on November 4, 2014. The legislation stipulates that parents must be informed of the professional qualifications of the student's classroom teachers at the beginning of the school year.

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

Required Action: For the 2015-2016 school year, the district must ensure that each of its Title I schools distributes the Parents' Right-to-Know letters at the beginning of the school year (no later than mid-October). The district must submit evidence of distribution to the NJDOE for review.

Title II

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

IDEA (Special Education)

A review of the fiscal and program components of the IDEA grant yielded no findings.

Administrative

Finding 5: On several occasions, the district failed to issue a purchase order prior to services being rendered (confirming orders). District policy and state regulations require that a properly executed purchase order be issued prior to services being rendered.

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Citation: 34 CFR §80.20: Standards for financial management systems. N.J.S.A. 18A:18A 2(v): Public School Contracts Law.

Required Action: The district must implement a process to ensure that purchase orders are issued prior to receiving goods and services from vendors.

Finding 6: The district did not obtain board approvals for the submission of FY 2014-2015 federal award applications. The NJDOE requires each district to go before its board of education to obtain approval for submission of the application, as well as, the acceptance of the grant funds, upon the subsequent approval of the application.

Citation: ESEA §9306(a): *Other General Assurances*. 34 CFR §76.770: A state shall have procedures to ensure compliance.

Required Action: The district must obtain the necessary board resolutions to ensure conformity with applicable federal and state requirements.

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.

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.