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

MONTAGUE BOARD OF EDUCATION

475 ROUTE 206 MONTAGUE, NJ 07827 PHONE: (973) 293-7131



New Jersey K-12 Education

CONSOLIDATED MONITORING REPORT JUNE 2014

District:

Montague Township School District

County:

Sussex

Dates On-Site:

April 15 and 16, 2014 CM-050-13

Case #:

FUNDING SOURCES

Program		Funding Award		
Title I, Part A		\$	150,143	
IDEA Basic IDEA Preschool			112,784 4,416	
Title II, Part A			8,124	
· ·	Total Funds	\$.	275,467	

BACKGROUND

The Elementary & 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 Montague 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); and IDEA Basic and Preschool for the period July 1, 2012 through March 31, 2014.

The scope of work performed included the review of documentation including grant applications, program plans and needs assessments, grant awards, annual audits, board minutes, payroll records, accounting records, purchase orders, 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, and IDEA Basic and Preschool from July 1, 2012 through March 31, 2014. A sampling of purchase orders and/or salaries was taken from each program reviewed.

GENERAL DISTRICT OVERVIEW OF USES OF TITLE I AND IDEA FUNDS

Title I Projects

The district operates a Title I targeted assistance program. The district uses its Title I funds to support the Title I/Basic Skills instruction program in mathematics and English language arts literacy content areas.

IDEA Projects

The IDEA Basic and Preschool funds were utilized in FY 2013 for tuition of out-of-district students with disabilities. The district allocated IDEA FY 2014 Basic and Preschool funding for the same purposes.

DETAILED FINDINGS AND RECOMMENDATIONS

Title I

Finding 1: The district's needs assessment in the FY 2013-2014 ESEA Consolidated Application indicated only English Language Arts Literacy (ELA) as the district's priority problem; however, the district implements a Title I program that includes both ELA and mathematics content areas.

Citation: ESEA §1112; Local Educational Agency Plans.

Required Action: For FY 2014-2015, the district must align its Title I priority problems on the needs assessment in the ESEA Consolidated Application with the components of the Title I program the district will implement.

Finding 2: The district's Title I parental notification letter did not include the multiple, educationally related, objective entrance and exit criteria used for Title I student identification, the remediation actions the district is using and the option for parents to opt-out of Title I services. This information is necessary for parents/guardians of Title I students to understand the reasons their child was selected to participate in the Title I program, and what is needed for their child to exit the program.

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

Required Action: The district must revise its Title I participation letter to include the multiple, educationally related, objective criteria used for Title I student identification, the remediation actions the district is using and the option for parents to opt-out of Title I services. The district must provide a copy of its revised FY 2014-2015 Title I participation letter to the NJDOE for review.

<u>Finding 3:</u> The district did not provide evidence of convening the annual Title I parent meeting. Evidence was not provided that the Basic Skills Program meeting that occurred fulfilled the legislative requirements. Not conducting an annual meeting to explain the Title I legislation and the district's Title I program does not allow Title I parents/guardians to be informed and vested in the Title I process.

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

Required Action: The district must convene its FY 2014-2015 annual Title I meeting for the parents/guardians of Title I students in the beginning of the school year (no later than mid-October). Evidence of the meeting which includes invitational letters/flyers, agendas, meeting minutes, and sign in sheets must be submitted to the NJDOE for review.

Finding 4: The district did not have a parental involvement program that reflected the requirements of the Title I legislation. There was no evidence the district's FY 2013-2014 parental involvement policy was reviewed and board adopted since October 22, 2008 and that the policy was developed in conjunction with parents. The annual review and current board adoption of the district parental involvement policy allows parents/guardians of Title I students to impact the parental involvement process and identify the unique needs of the Title I schools.

Citation: ESEA §1118(a)(2): Parental Involvement (Written Policy).

Required Action: The district must have the district parental involvement policy reviewed annually with current board adoption. Copies of recent board approved district parental involvement policy must be submitted to the NJDOE for review. The inclusion of parents/guardians of Title I students must be documented with meeting agendas, sign in sheets and minutes.

Finding 5: The district did not provide evidence that the FY 2013-2014 school-parent compact was developed in conjunction with Title I parents. The absence of parent participation in developing this required document excluded parents from more active participation in their child's educational program.

Citation: ESEA §1118: Parental Involvement.

Required Action: The district must include the parents/guardians of Title I students in the development of the school-parent compact. The district must submit documentation supporting the participation of Title I parents in the development of the FY 2014-2015 school-parent compact to the NJDOE for review.

<u>Finding 6:</u> The district's website was missing the school-parent compact and the website contained the outdated district parental involvement policy.

Citation: ESEA §1111(h)(2)(E): Public Dissemination.

Required Action: The district must review and update its website to include the school-parent compact and the current district parental involvement policy to meet the ESEA broader dissemination requirement. Upon updating its website, the district must forward the link to the NJDOE for review.

Finding 7: Because the district did not contact nonpublic schools outside the district's attendance area, it reported zero nonpublic enrollment and low-income counts on the FY 2013-2014 ESEA Consolidated Application in Step One of the Title I, Part A eligibility tab. The district's submission of zero nonpublic enrollment and low-income counts prevented the generation of an equitable participation share of funding for eligible resident nonpublic school students.

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

Required Action: For FY 2014-2015, the district must contact nonpublic schools within a 50 mile radius of the district to obtain nonpublic enrollment and low income data no later than June. The district must contact the nonpublic schools that enroll Montague resident students to inform the schools of their opportunity to participate in the district's Title I program for the upcoming school year. After contacting nonpublic schools that enroll resident students, the district must then begin the consultation process with the nonpublic schools to identify eligible 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 NJDOE for review.

Finding 8: The district's use of Title I funds supplanted state/local funds. The district expended FY 2013-2014 Title I funds to purchase mathematics curriculum kits (\$28,589.73) that benefited both Title I and non-Title I students. As such, this expenditure supplanted state/local funds. The district also budgeted Title I funds for computer professional development and support (\$70,000), consumable items (\$65,000), textbooks and workbooks (\$2,143), field trip transportation (\$9,000), and copying/duplicating (\$4,000) that would benefit both Title I and non-Title I students.

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

Required Action: The district must allocate state/local funds rather than using Title I funds to support this expenditure. The district must provide evidence of the adjusting accounting entry for the expenditure of \$28,589.73 to the NJDOE for review. After identifying allowable uses for Title I funds previously budgeted for unallowable expenditures, the district may need to amend its FY 2013-2014 ESEA Consolidated Application in the Electronic Web Enabled Grant system. Additionally, if the district is unable to expend at least 85% of its FY 2013-2014 Title I allocation, it will need to request a carryover waiver.

Title II

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

IDEA (Special Education)

<u>Finding 9:</u> The district did not consistently conduct multidisciplinary 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 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. The district is referred to the sample report form for speech-language evaluations which is located at: www.state.nj.us/education/speced/forms. A monitor from the NJDOE will conduct an on-site visit to interview staff, review speech language evaluations for students whose meetings were conducted between September 2014 and December 2014, and to review the oversight procedures.

Finding 10: 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, the assessments did not include:

- an observation of the student in other than a testing setting; and
- review of prior interventions.

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(e)(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 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 of students evaluated between September 2014 and December 2014, and to review the oversight procedures.

<u>Finding 11:</u> The district did not consistently conduct an annual IEP team meeting for each student eligible for speech-language services.

Citation: N.J.A.C. 6A:14-3.7(i); 20 U.S.C. §1414(d); and 34 CFR §300.324(b)(1).

Required Action: The district must ensure that IEP team meetings are conducted annually or more often if necessary to review, revise and determine the programs and placement of each classified student. In order to demonstrate correction of noncompliance, the district must conduct training for speech-language therapists 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 evaluations of students whose initial meetings were conducted between September 2014 and December 2014, and to review the oversight procedures.

<u>Finding 12:</u> The district does not have a policy for the provision of students with disabilities participating in district wide assessments.

Citation: 34 CFR §300.160.

Required Action: The district must revise its policies and procedures to ensure students with disabilities participate in district wide assessments. The policy must include the provision of accommodations and modifications and the provision of alternate assessments for those children who cannot participate in the regular assessment. If the district reports publicly on the district wide assessment, the district must also report with the same frequency and in the same detail as it reports on the assessment of nondisabled children. A monitor from the NJDOE will conduct an on-site visit to review this policy revision.

Administrative

Finding 13: On several occasions, the district failed to issue a purchase order prior to goods being purchased or services being rendered (confirming order). District policy and state regulations require that a properly executed purchase order be issued prior to the purchase of goods or the rendering of services.

Citation: EDGAR, PART 80-Uniform Administrative Requirements for Grants and Cooperative Agreements to State and Local Governments, Section 20, Standards for financial management systems. N.J.S.A. 18A:18A(2)(v) Public School Contracts Law.

Required Action: Purchase orders should be issued to all vendors prior to goods or services being provided.

Finding 14: The district does not have a purchasing manual that details procedures for the procurement of goods and services.

Citation: EDGAR, PART 80--Uniform Administrative Requirements for Grants and Cooperative Agreements to State and Local Governments, Section 20, Standards for financial management systems. N.J.A.C. 6A:23A-6.6 Standard operating procedures for business functions.

Recommended Action: The district should prepare and adopt a detailed purchasing manual to ensure compliance with current state and federal procurement regulations.

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

Resolution:

Pursuant to N.J.A.C. 6A:23A-5.6, within 30 days of receipt of the report, the board of education must discuss the findings of the report at a public meeting of the board. Within 30 days of the public meeting, the board must adopt a resolution certifying that the findings were discussed in a public board meeting and approving a corrective action plan to address issues raised in the undisputed findings and/or appeal of any findings in dispute. Within 10 days of adoption of the resolution by the board, such resolution together with the approved corrective action plan and/or appeal must be submitted to the Office of Fiscal Accountability and Compliance. The findings of the Office of Fiscal Accountability and Compliance's report and the board of education's corrective action plan must be posted on the district's website.

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

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

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.

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

SCHOOL DISTRICT NAME: Montague Township School District

COUNTY: Sussex

TYPE OF EXAMINATION: Consolidated Monitoring

DATE OF BOARD MEETING: July 23, 2014

CONTACT PERSON: Janice L. Hodge

TELEPHONE NUMBER: 973-293-7131

FAX NUMBER: 973-293-3391

FOR DATE OF ION IMPLEMENTATION	November 2014		
INDIVIDUAL RESPONSIBLE FOR IMPLEMENTATION	J. Hodge		
METHOD OF IMPLEMENTATION	NCLB application needs assessment will be revised by amendment to reflect ELA and math for priority problems		
CORRECTIVE ACTION	Align FY 2014-2015 Title 1 priority problems on needs assessment to represent program district implements		
RECOMMENDATION NUMBER	ESEA 1112	Finding 1	

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

SCHOOL DISTRICT NAME: Montague Township School District

TYPE OF EXAMINATION: CONSOLIDADE CHOSTING

DATE OF BOARD MEETING: 10/4 23, 20 14 CONTACT PERSON: LENCE LACKEL

TELEPHONE NUMBER: 973-293-7131

COUNTY: Sussex

FAX NUMBER: 973-293-3391

IMPLEMENTATION September 5, 2014 COMPLETION DATE OF INDIVIDUAL RESPONSIBLE FOR IMPLEMENTATION M. Higbie objective entrance posted on district participation letter notification letter notification letter added to parental added to parental early September and exit scores Title I parental sent to parents opt out option METHOD OF IMPLEMENTATION website letter objective criteria for entrance and litle I participation letter distributed to parents early in September includes: CORRECTIVE ACTION exit to Title I program parental notification opt out option RECOMMENDATION NUMBER **SEA 1115** Finding 2

Chief School Administrator

Date

oard Secretary/Business Administrato

10/6/14 Date

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

SCHOOL DISTRICT NAME: Montague Township School District

COUNTY: Sussex

TYPE OF EXAMINATION: CORECIDENT MONUTERING

DATE OF BOARD MEETING: 12/4 3-3, 3014

CONTACT PERSON: Jance

TELEPHONE NUMBER: 973-293-7131

FAX NUMBER: 973-293-3391

Sept. 10, 2014 letter inviting parents to M. Higbie
in 10, 2014 letter ting parents to M. Higbie
10, 2014 letter fing parents to
invii invii
multiple opportunities for parental

AMULE LODGE

ard Secretary/Business Administrator

10/14/14

COUNTY: Sussex

SCHOOL DISTRICT NAME: Montague Township School District
TYPE OF EXAMINATION: (ORSON CATE OF EXAMINATION:

DATE OF BOARD MEETING: JOS/4 33, 20 14 CONTACT PERSON: DUNICE LAERCE

TELEPHONE NUMBER: 973-293-7131

FAX NUMBER: 973-293-3391

ļ 		
COMPLETION DATE OF IMPLEMENTATION	January, 2014	
INDIVIDUAL RESPONSIBLE FOR IMPLEMENTATION		
METHOD OF IMPLEMENTATION	Copy of BOE minutes from January, 2014 reorganizational meeting	
CORRECTIVE ACTION	• all policies are approved at the January, 2014 reorganizational meeting of the BOE. Provide evidence of BOE Parental	involvement approved policy from January, 2014 reorganizational meeting where all policies are approved. Policies will be reviewed and approved again at the January, 2015 reorganizational meeting.
RECOMMENDATION NUMBER	ESEA 118 (a) (2)	Finding 4

Chief Achool Administrator

Board Secretary/Business Administrator

SCHOOL DISTRICT NAME: Montague Township School District

TYPE OF EXAMINATION: (SOMSO)IC) at ed Monutaing

DATE OF BOARD MEETING: JOH 33, 2014
CONTACT PERSON: Jance Lyedge

TELEPHONE NUMBER: 973-293-7131

COUNTY: Sussex

FAX NUMBER: 973-293-3391

COMPLETION DATE OF IMPLEMENTATION	October 6, 2014	
INDIVIDUAL RESPONSIBLE FOR IMPLEMENTATION	M. Higbie	
METHOD OF IMPLEMENTATION	 agenda for development of compact in meeting letter minutes on development of compact at parental meeting file of signed compacts posting Compact on the compacts posting Compact on district 	
CORRECTIVE ACTION	School-parent compact to developed at parental meeting in September. Compact signed by BSI (Title I) Coordinator, teacher and then distributed to Title I parents. Parents sign and return one copy and keep one copy. post Compact on district website www.montagueschool.org parent portal	
RECOMMENDATION NUMBER	ESEA 118	Frain S

Chief School Administrator

Board Secretary/Business Administr

SCHOOL DISTRICT NAME: Montague Township School District

COUNTY: Sussex

TYPE OF EXAMINATION: CORECULACTE of MONE HEZING

DATE OF BOARD MEETING: 10/4 25, 2014

CONTACT PERSON: Jance

TELEPHONE NUMBER: 973-293-7131

FAX NUMBER: 973-293-3391

COMPLETION DATE OF IMPLEMENTATION	October 1, 2014	•
INDIVIDUAL RESPONSIBLE FOR IMPLEMENTATION	14	
METHOD OF IMPLEMENTATION	posted 2014 compact developed at parental meeting on BSI (Title I) parent portal on district website	
CORRECTIVE ACTION	Post current compact on district website	
RECOMMENDATION NUMBER	ESEA 1111 Finding 6	•

51(a) a)

Board Secretary/Business Administrator

SCHOOL DISTRICT NAME: Montague Township School District

COUNTY: Sussex

TYPE OF EXAMINATION: Consolidated Monitoring

DATE OF BOARD MEETING: July 23, 2014

CONTACT PERSON: Janice L. Hodge

TELEPHONE NUMBER: 973-293-7131

FAX NUMBER: 973-293-3391

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COMPLETION DATE OF IMPLEMENTATION	October 2014				-
INDIVIDUAL RESPONSIBLE FOR IMPLEMENTATION	J. Hodge				
METHOD OF IMPLEMENTATION	Non-public schools that J. Hodge enrolled Montague students were contacted via fax for participation.	Fax contact sheets attached.	Other documents on file in district.	Consultative process will begin in July 2015 for FY 2016.	
CORRECTIVE ACTION	Non-public school notification				
RECOMMENDATION NUMBER	ESEA 1120		Finding 7		

7190

SCHOOL DISTRICT NAME: Montague Township School District

COUNTY: Sussex

TYPE OF EXAMINATION: Consolidated Monitoring- June 2014

DATE OF BOARD MEETING: JOS/4 23, 2014
CONTACT PERSON: Jance L Hocke, USA

TELEPHONE NUMBER: 973-293-7131

FAX NUMBER: 973-293-3391

COMPLETION DATE OF IMPLEMENTATION	April 18, 2014	June 2014	
INDIVIDUAL RESPONSIBLE FOR IMPLEMENTATION	John Waycie-SBA April 18, 2014	John Waycie- SBA June 2014	
METHOD OF IMPLEMENTATION	Revision of original purchase order charging Amount to account #11-190-100-610-instructional supplies	Reviewed correct sequence that must be followed in processing of purchase requests and issuing of purchase orders	
CORRECTIVE ACTION	\$28,589.73 of unallowable expenditures charged to Title 1 reallocated to state/local funds. (see attached copy of revised Purchase Order)	Purchase orders should be issued to all vendors prior to goods or services being provided.	
RECOMMENDATION NUMBER	8#	# 13	

Hoard Segretary/Business Administrator

SCHOOL DISTRICT NAME: Montague Township School District

TYPE OF EXAMINATION: CONSOLICATED Monetezing

DATEOFBOARDMEETING: JOHN 23, 2014 CONTACT PERSON: JOENICE HONGO, CLEAR

COUNTY: Sussex

TELEPHONE NUMBER: 973-293-7131

FAX NUMBER: 973-293-3391

COMPLETION DATE OF IMPLEMENTATION	10/15/14 Ongoing	10/15/14	Ongoing	Ongoing
INDIVIDUAL RESPONSIBLE FOR IMPLEMENTATION	Rose Musto Janice Hodge	Rose Musto	Rose Musto	Rose Musto
METHOD OF IMPLEMENTATION	Training Session Documentation Review	Training Session	Documentation Review	Documentation Review
CORRECTIVE ACTION	The Child Study Team Coordinator will conduct a training session for the Child Study Team and Speech and Language Therapists Chief School Administrator Reviews IEP's before they are sent home.	The Child Study Team Coordinator will conduct a training session for the Child Study Team and Speech and Language Therapists	individual evaluations to insure that there is at least one observation. Child Study Team Members and Speech	when Nature & Scope Document is completed. Coordinator will review for completeness.
RECOMMENDATION NUMBER	Finding 9.	Finding 10.	•	

Secretary/Business Administrator

SCHOOL DISTRICT NAME: Montague Township School District

COUNTY: Sussex

TYPE OF EXAMINATION: CONSOLIDATED MONUFORLY

DATE OF BOARD MEETING: JOLY 23,2014
CONTACT PERSON: Jance L Hocke, USA

TELEPHONE NUMBER: 973-293-7131

FAX NUMBER: 973-293-3391

	COMPLETION DATE OF IMPLEMENTATION	10/15/2014	Ongoing	Completed	- · · · · · · · · · · · · · · · · · · ·
	INDIVIDUAL RESPONSIBLE FOR IMPLEMENTATION	Rose Musto	CST Secretary		
	METHOD OF IMPLEMENTATION	Training Session	Oversight of Scheduling		
The state of the s	CORRECTIVE ACTION	The Child Study Team Coordinator will conduct a training session for the Child Study Team and Speech and Language Therapists.	Child Study Team Secretary will oversee the scheduling of Annual Reviews for the Speech-Only IEP's in addition to other IEP's to assure that they are conducted within compliance parameters.	Policy updated – See attached	
a de la companya de l	RECOMMENDATION NUMBER	Finding 11		Finding 12	To you