

**STATE OF NEW JERSEY
DEPARTMENT OF EDUCATION
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**WOOD-RIDGE BOARD OF EDUCATION
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New Jersey K-12 Education

**CONSOLIDATED MONITORING REPORT
APRIL 2016**

District: Wood-Ridge Public School District
County: Bergen
Dates On-Site: January 26, 27 and 28, 2016
Case #: CM-010-15

FUNDING SOURCES

Program	Funding Award
Title I, Part A	\$ 94,573
IDEA Basic	265,333
IDEA Preschool	11,375
Title II, Part A	21,148
Title III	2,593
Total Funds	<hr/> <hr/> \$395,022

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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 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 Wood-Ridge Public 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; and IDEA Basic and Preschool for the period July 1, 2014 through December 31, 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, 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 December 31, 2015. 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 is using FY 2015-2016 Title I funds to implement a targeted assistance program in the Catherine E. Doyle Elementary School, Wood-Ridge Intermediate School and Wood-Ridge Junior-Senior High School. Primarily, the funds are being used for instructional materials and stipends for the lunch time remedial program and after school PARCC test preparation.

IDEA Projects

The district used the FY 2015-2016 IDEA 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 to purchase equipment for the autism class.

DETAILED FINDINGS AND RECOMMENDATIONS

Title I

Finding 1: The Title I participation letter(s) for the Wood-Ridge Intermediate and Wood-Ridge Junior-Senior High Schools (Note: no letters were provided for the Catherine F. Doyle Elementary School) informing parents of the Title I eligible students about the Title I program did not have clearly defined program entrance and exit criteria. Without this information, parents are unable to understand the reasons for their child being selected to participate in the Title I program, and what is needed for their child to exit the program. In addition, the letters presented did not contain the opt-out option for parents who are opposed to their child participation in the program.

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

Required Action: The district's Title I schools must develop and/or revise their Title I participation letter(s) to include clearly defined entrance and exit criteria used for Title I student identification and what is required to exit the program and address the opt-out option. The district must provide a copy of each school's revised FY 2015-2016 Title I participation letter to the NJDOE for review.

Finding 2: The district did not have a parental involvement program that reflected the requirements of the Title I legislation. In addition, no evidence was provided that parents had input into the development of the parental involvement policies. The district's Title I parental involvement policy was last reviewed and board adopted on April 20, 2011, and no evidence of Title I school-level parental involvement policies for each of the three schools was provided. Title I requires an annual review and current board adoption allowing parents and other stakeholders to impact the parental involvement process and identify the unique needs of the

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Title I schools and parents of Title I students. 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.

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

Required Action: The district must have a written district parental involvement policy evaluated annually with current board adoption along with current school-level parental involvement policies. Copies of a recent board approved district parental involvement policy must be submitted to the NJDOE for review. For FY 2016-2017, Title I parents and associated stakeholders must be included in the development processes.

Finding 3: For FY 2015-2016, the district provided evidence of the schools' Title I school-parent-student compacts, but did not provide evidence that the school-parent-student compacts were developed in conjunction with Title I parents. The absence of parent participation in developing these required documents excluded parents from more active participation in their child's educational program.

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

Required Action: For FY 2016-2017, the district's Title I schools must develop school-parent-student compacts that include the associated stakeholder groups in the development process. The district must provide evidence that its schools collaborated with Title I parents in the development and annual review of the school-parent-student compacts to the NJDOE for review.

Finding 4: For FY 2015-2016, the district provided documentation that its Title I schools convened the annual Title I parent meeting at the Wood-Ridge Intermediate and the Junior-Senior High Schools; however, insufficient evidence was provided for Catherine F. Doyle Elementary School. Although Title I was listed on the agendas presented for each school, there was no evidence that a Title I specific meeting was held for only the parents of participating students. Not conducting Title I specific meetings at the beginning of the year to explain the Title I legislation and the district's Title I programs at each school did not allow parents of participating students to be informed and vested in the Title I process from the start.

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

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

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Finding 5: The district provided a letter dated August 10, 2015 announcing the planning meeting for nonpublic schools; however, the district failed to provide evidence that the letters were distributed. In addition, the date of the letter and the date of the scheduled meeting were late in the year, which is not best practice for notification and collaboration. The district failed to follow up and obtain documentation of refusal from each of the schools contacted.

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

Required Action: The district must contact the nonpublic schools within and outside the attendance area that enroll resident students in a timely manner to ensure Title I eligibility so students receive Title I services in a timely manner. The district must use the Nonpublic School Survey to generate accurate enrollment and low-income nonpublic student data. For FY 2016-2017, the district's ESEA-NCLB Consolidated Application must reflect the nonpublic enrollment and nonpublic low-income counts for all nonpublic schools. Additionally, the district must send documentation of the consultation process (e.g., invitational letters/flyers, agendas, meeting notes, sign in sheets,) to the NJDOE for review.

As an established practice, the district must start its outreach process to nonpublic schools early in the year. In the spring of each school year, the district should begin the consultation process to identify eligible Title I students and to develop the service delivery plan for the coming school year.

Finding 6: There was no evidence that the district distributed the Parents' Right-to-Know Highly Qualified Teacher (HQT) letter to all parents/guardians for the current school year. It was stated that the letter was handed out at the Back to School Night and at Parent Conferences; however, this was not documented. Additionally, distributing the letter during Back-to-School Night did not guarantee distribution to all parents/guardians.

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

Required Action: Moving forward the district must ensure that all eligible parents receive a copy of the Parents' Right-to-Know letter in a language they can understand.

Finding 7: The Title I program identified at the Wood-Ridge Intermediate and Junior-Senior High Schools, which included remedial mathematics during lunch for identified students did not meet the ESEA/NCLB requirements for allowable Title I services. Title I services may not replace any required activity scheduled during the regular school day.

Citation: ESEA §1115(c)(1)(C)(i): *Targeted Assistance.*

Required Action: When designing the Title I program, the district must also consider the social and emotional needs of the students and give primary consideration for a plan that includes providing an extended day/year program. The district must provide the NJDOE with a copy of its new plan for remediation at the Wood-Ridge Intermediate and Junior-

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Senior High Schools, and a description of its Title I program at the Catherine F. Doyle Elementary School.

Finding 8: The Title I program for Catherine F. Doyle Elementary School included the Response to Intervention (RTI) schedule only (RTI levels two and three are the only levels allowable for Title I funding.) In addition, the monitoring team was unable to obtain a clear understanding of the services being provided by the district at the elementary school-level.

Citation: ESEA §1115: *Targeted Assistance Schools.*

Required Action: The district must provide the NJDOE with a description of its Title I program at the elementary school.

Title II

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

Title III

Finding 9: For FY 2015-2016, the review of a sample of the Notification of Bilingual/ESL Program Placement letters to parents did not specifically identify multiple criteria used in making initial determinations for identifying the student as an English Language Learner (ELL), and why the student needs to be placed in a language instructional educational program that will assist in developing and attaining English proficiency and meet state standards. In addition, initial placement letters to parents were not in the languages of students served with Title III.

Citation: ESEA §3302: *Parental Notification.*

Required Action: The district must revise its initial Title III parental notification letter to include all the required components. The district must submit a copy of its revised letter to the NJDOE for review.

Finding 10: For FY 2015-2016, the district is a LEA Participant in a Title III Consortium. As such, the district could not provide evidence of a dated and signed Title III Consortium Memorandum of Understanding (MOU) or Agreement between the lead applicant district and participant districts, which outlines how the consortium will meet all the Title III requirements.

Citation: ESEA §3115: *Subgrants to Eligible Entities.*

Required Action: The district must develop a dated and signed Consortium MOU or Alternative Agreement between the lead applicant and participant LEA (Wood-Ridge Public School District) to enter into a Title III Limited English Proficiency Consortium. The district must submit a copy of the MOU or Alternative Agreement to the NJDOE for review.

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IDEA (Special Education)

Finding 11: The district did not ensure child study team participation at the planning conference of students transitioning from an early intervention program to preschool.

Citation: N.J.A.C. 6A:14-3.3(e)1; 20 U.S.C. §1412(a)(9); and 34 CFR §300.124(c).

Required Action: The district must ensure a member of the child study team participates in the planning conferences 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 demonstrating participation of a child study team member in transition planning conferences conducted between September 2016 and December 2016 for students transitioning from early intervention to preschool, and to review the oversight procedures.

Finding 12: The district did not consistently conduct identification meetings within 20 calendar days of receipt of a written request for evaluation for students eligible for special education and related services to determine if an evaluation was warranted.

Citation: N.J.A.C. 6A:14-2.5(b)6; 3.3(e) and 3.6(b).

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 correction of noncompliance, the district must conduct training for child study team members and develop an oversight mechanism to ensure compliance with the requirements in the citation listed above. A monitor from the NJDOE will conduct an on-site visit to interview staff, review documentation from meetings conducted between September 2016 and December 2016, and to review the oversight procedures.

Finding 13: The district did not consistently document the attendance of required participants during identification, initial eligibility, IEP, and reevaluation meetings for students eligible for special education and related services and identification meetings for students referred for speech-language services.

Citation: N.J.A.C. 6A:14-2.3(k); 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 that documentation of attendance and/or written parental consent to excuse a member of the team is maintained in student's 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

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NJDOE will conduct an on-site visit to interview staff, review meeting documentation, including the sign in sheets, for meetings conducted between September 2016 and December 2016, and to review the oversight procedures.

Finding 14: 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).

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 the 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 September 2016 and December 2016, and to review the oversight procedures.

Finding 15: The district did not consistently provide to students eligible for special education and related services written notice of graduation and the summary of academic achievement and functional performance prior to graduating or exiting.

Citation: N.J.A.C. 6A:14-4.11(b)1.4; and 20 U.S.C. §1414(c)(5)(B); and 34 CFR §300.305(e)(3).

Required Action: The district must ensure written notice of graduation and a summary of academic achievement and functional performance is provided to parents or adult students prior to graduating or exiting the program. 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 the written notice of graduation and summary of academic achievement and functional performance provided to eligible students at the conclusion of the 2016-2017 school year, and to review the oversight procedures.

Finding 16: The district did not consistently document all required considerations and statements in the IEPs of students eligible for speech-language services. IEPs did not consistently include:

- participation in district wide assessments; and
- approved accommodations and modification on school and statewide assessments.

Citation: N.J.A.C. 6A:14-3.7(e) 1-17, and (f); 20 U.S.C. §1414(d)(3)(A)(B); and 34 CFR §300.324(a)(1)(2).

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Required Action: The district must ensure each IEP contains all required components. 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 citations listed above. To demonstrate the district has corrected the individual instances of noncompliance, the district must conduct annual review meetings and revise the IEPs for specific students with IEPs that were identified as noncompliant. A monitor from the NJDOE will conduct an on-site visit to interview staff, review the revised IEPs, along with IEPs developed at meetings conducted between September 2016 and December 2016, 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 17: 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, including students placed in separate settings, consideration of placement in the least restrictive environment. Specifically, IEPs did not consistently include:

- comparison of the benefits provided in the regular class and the benefits provided in the special education class; and
- the potentially beneficial or harmful effects which a placement in general education may have on the students with disabilities or other students in the class.

Citation: N.J.A.C. 6A:14-4.2 (a)8,(ii) and (iii) and 3.7(k).

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. The district must also ensure that for students placed in separate settings, the IEP team identifies activities to transition the student to a less restrictive environment and document them in each IEP. In order to demonstrate correction of noncompliance, the district must conduct training for child study team members regarding the district's procedures 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 additional IEPs developed at meetings conducted between September 2016 and December 2016, 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.

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Administrative

Finding 18: 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: Uniform Grant Guidance 2 C.F.R. 200.302; 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.

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.

**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 _____

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OFFICE OF FISCAL ACCOUNTABILITY AND COMPLIANCE
CORRECTIVE ACTION PLAN

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

Chief School Administrator

_____ Date

Board Secretary/Business Administrator

_____ Date