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Bloomfield Township School District
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New Jersey K to 12 Education

Collaborative Monitoring Report
July 2019

District: Bloomfield Township School District
County: Essex
Dates On-Site: April 30, May 1 and 2, 2019
Case #: CM-001-19

Funding Sources

Program	Funding Award
Title I, Part A	\$1,372,756
IDEA Basic	1,560,624
IDEA Preschool	42,149
Title II, Part A	226,057
Title III	54,665
Title III Immigrant	78,949
Title IV, Part A	48,495
Total Funds	<u><u>\$3,383,695</u></u>

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Background

The Every Student Succeeds Act (ESSA) 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 (ESSA, IDEA and Carl D. Perkins). The laws further require that state education agencies such as the New Jersey Department of Education (NJDOE) monitor the implementation of federal programs by sub recipients and determine whether the funds are being used by the district for their intended purpose and achieving the overall objectives of the funding initiatives.

Introduction

The NJDOE visited the Bloomfield Township School District to monitor the district's use of federal funds and the related program plans, where applicable, to determine whether the district's programs are meeting the intended purposes and objectives, as specified in the current year applications and authorizing statutes and to determine whether the funds were spent in accordance with the program requirements, federal and state laws, and applicable regulations. The on-site visit included staff interviews and documentation reviews related to the requirements of the following programs: Title I, Part A (Title I); Title II, Part A (Title II); Title III; Title IV, Part A (Title IV), IDEA Basic and Preschool and Carl D. Perkins for the period July 1, 2018 through April 30, 2019.

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, Title IV, IDEA Basic and Preschool and Carl D. Perkins Grant from July 1, 2018 through April 30, 2019. 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 is using its fiscal year 2018-2019 Title I funds to implement a targeted assistance program in one elementary school, and schoolwide programs in the other seven Title I schools.

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Primarily, the district provides supplemental instructional opportunities through extended day and extended year programs.

Title II-A Projects

The Bloomfield School District uses the Title II-A funds for revising curriculum, research and implementation of an inclusion model, providing a master teacher to coach other teachers and reducing class size to improve academic achievement.

Title III Projects

Title III funds were expended on instructional salaries and supplies.

Title IV-A Projects

The Bloomfield School District uses the Title IV-A Funds for supplies for STREAM (science, technology, research, arts, math) summer camp, anti-bullying activities, suicide prevention materials, counseling services, accelerated learning programs for the elementary grades and teacher training in use of technology tools. The District will revise their needs assessment to include stakeholder input and additional details supporting the use of funds.

IDEA Projects (Special Education)

The FY 2019 IDEA Basic funds are being used to reduce district tuition expenditures for students receiving special education services in approved private schools for students with disabilities, instructional supplies and for the provision of related services. Additionally, IDEA funds are being expended to support students with service plans in nonpublic settings.

Carl D. Perkins Grant

The Bloomfield School District is operating the following approved Career and Technical Education program at Bloomfield High School: Accounting Technology/Technician and Bookkeeping (CIP Code 52.0302).

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 criteria used to identify their child/children for Title I services.

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Citation:

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

Required Action:

The Demarest School's parent notification letters must include clearly defined entrance and exit criteria. The school must provide a copy of its revised parent notification letter for 2019-2020 to the NJDOE for review.

Recommendation:

It is recommended that the district implement a system for tracking student progress, which includes dates of assessments. The data for the Demarest school suggests that students would benefit from math interventions as well as interventions at all grade levels, which is not currently offered, as well. Additionally, the district should consider applying for schoolwide status at this school, which would allow the school to serve all students.

Finding 2:

The district did not provide school-level Title I parent and family engagement policies for all eight Title I schools. Additionally, there was no evidence that the district policy was reviewed since 2011. 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 Title I parents.

Citation:

ESEA §1116(a)(2): Parent and Family Engagement (Written Policy); ESEA §1116(b): Parent and Family Engagement (School Parent and Family Engagement Policy).

Required Action:

The district must have both a written district parent and family engagement policy and school-level parent and family engagement policies developed with parental input. Both policies must be evaluated annually. The district should provide technical assistance to its schools in the development of school-level parent and family engagement policies and ensure that its schools work with their stakeholder groups to develop the policies and review it annually. The district must submit copies of a recent board approved district parent and family engagement policy and school-level policies to the NJDOE for review. The district must also submit evidence of engaging parents in the development and review of the policies (meeting agendas, sign-in sheets, minutes), and evidence of the board's adoption of the district level policy (board meeting minutes).

Finding 3:

The activities in each school's Annual School Plan did not support all of the activities for which the schools are using their Title I funds. In a Title I schoolwide program, the school must use Title I funds and services to upgrade the entire educational program while continuing to provide

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services to its lowest performing students. The Annual School Plan becomes the mechanism for the school to document its efforts to meet the purpose and intent of the Title I legislation, and how the Title I funds will be used to support the program.

Citation:

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

Required Action:

The district must ensure each school's 2019-2020 Annual School Plan reflects the current programs being delivered in each school and includes interventions for addressing the needs of the full continuum of students (including students with disabilities and gifted and talented students).

Finding 4:

The district's Title I schools did not provide information to parents in multiple languages. Schools are required to provide information to parents of students participating in Title I programs in a language that is understandable and in a uniform format, including alternative formats upon request.

Citation:

ESEA §1116(b)(1): Parent and Family Engagement (School Parent and Family Engagement Policy); ESEA §1116(d)(2)(D): Parent and Family Engagement (Shared Responsibilities for High Student Academic Achievement).

Required Action:

The district must have all required documents translated into a language that is understandable to the parents of the students served. The documents that must be in multiple languages are the District/School Parent and Family Engagement Policy, Parent-School Compact, Title I Parent Notification Letter, and the Parents' Right to Know Letter, at a minimum.

Finding 5:

The district provided limited evidence of an active stakeholder committee involved in the development of the Annual School Plan. There was no evidence, such as meeting notes, agendas and sign in sheets, that the committee was consulted in the development and implementation of the Title I Annual School Plan.

Citation:

ESEA 1114(b)(2)(B)(ii): Plan Development.

Required Action:

The district must convene and/or consult with its stakeholder committee for input and peer review before changes are made to the Annual School Plan. These meetings and

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consultations must be documented with agenda, sign in sheets and minutes, and uploaded as part of the Annual School Plan.

Title II-A

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

Title III

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

Title IV-A

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

IDEA (Special Education)

Finding 6:

The district did not consistently conduct reevaluations within three years of previous classification date for students referred for special education and related services.

Citation:

N.J.A.C. 6A:14-3.8(a)

Required Action:

The district must ensure reevaluations are conducted within required timelines. 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 a site visit to interview staff, review documentation of eligibility meetings held as part of the reevaluation process between December 2019 and March 2020, and to review the oversight procedures.

Finding 7:

The district did not consistently provide to student's eligible for special education and related services written notice of graduation and a summary of academic achievement and functional performance written prior to graduating and/or exiting.

Citation:

N.J.A.C. 6A:14-4.11(b);4

Required Action:

The district must ensure students are provided with written notice of graduation and a summary of academic achievement and functional performance prior to graduation that

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addresses all required components. 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 a site visit to interview staff, review written notice of graduation and the summary of academic achievement and functional performance provided to students at the conclusion of the 2019-2020 school year, and review the oversight procedures.

Finding 8:

The district did not consistently conduct all required sections of the functional assessment as a component of initial evaluations for students referred for speech-language services. Initial evaluation reports did not contain observations in a non-testing setting, teacher interview, review of developmental/educational history and review of prior interventions.

Citation:

N.J.A.C.6A:14-3.4(f)4(i-vi)

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. Monitors from the NJDOE will conduct a site visit to interview staff, review initial evaluation reports completed between December 2019 and March 2020, and review the oversight procedures. The district is referred to the sample report form located at: www.state.nj.us/education/specialed/form.

Finding 9:

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

Citation:

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

Required Action:

The district must ensure that a multidisciplinary evaluation is conducted for students referred for speech-language services by obtaining a statement from the general education teacher that details the educational impact of the speech problem on the student's progress in general education. In order to demonstrate correction of noncompliance, the district must conduct training for speech-language specialists and develop an oversight mechanism to ensure compliance with the requirements in the citation listed above. A monitor from the NJDOE will conduct a site visit to review initial

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evaluation reports for students referred for speech-language services whose eligibility meetings were held between December 2019 and March 2020.

Carl D. Perkins Grant

Finding 10:

The course sequence for the Accounting Technology/Technician and Bookkeeping (CIP 52.0302) program of study includes a “Personal Finance” course. The CTE curriculum guide on the district’s website describes the “Personal Finance” course as providing “the content of personal finance [that] will fulfill the NJDOE 2.5 [graduation] credit requirement”. The district may not use the “Personal Finance” course in the CTE course sequence, since it fulfills the graduation requirement for financial, economic, business, and entrepreneurial literacy requirement.

Citation:

Perkins § 311 (a) and N.J.A.C. 6A:8-5.1

Required Action:

The district must provide a coherent sequence of not fewer than three identifiable CTE courses. This three-course sequence may not include the “Personal Finance” course as one of the courses in the sequence. The district should make information about the program and course sequence available, including syllabi for each of the courses.

Finding 11:

The district does not have a current signed articulation agreement for the Accounting Technology/Technician and Bookkeeping (CIP 52.0302) program of study.

To be eligible for Perkins funding, the district must have at least one program of study. Since the Accounting Technology/Technician and Bookkeeping (CIP 52.0302) program is the district’s only approved program, the district is not eligible for FY20 Perkins funds until a current articulation agreement, that has been signed and dated, is on file for this program.

Citation:

Perkins § 135 (b)(1-9): Local uses of funds (Requirements for uses of funds) and 122 (c)(1)(A) and (C): State Plan (Plan contents) and FY19 Perkins Guidelines (Section 3, page 7)

Required Action:

The district must ensure that they have a current signed and dated articulation agreement on file for all approved CTE programs of study. The articulation agreement must be signed annually by the district superintendent and college president.

The district may not use FY20 Perkins funds until a signed and dated articulation agreement is on file for at least one program of study.

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Finding 12:

The district did not provide evidence of a CTE Advisory Board for the Accounting Technology/Technician and Bookkeeping (CIP 52.0302) program of study.

Citation:

Perkins § 135 (b)(5) and N.J.A.C. 6A:19-3.1

Required Action:

The district must ensure that at least two advisory board meetings are held each project period for all approved CTE programs. The advisory boards must include the required membership as indicated in the New Jersey Administrative Code listed above. The district must maintain evidence that meetings took place including sign-in sheets and meeting minutes. The sign-in sheet must indicate the name, organizational affiliation of each member, and signatures of those in attendance at the meetings.

Finding 13:

The district does not provide evidence that all students have the opportunity to participate in structured learning experiences for the Accounting Technology/Technician and Bookkeeping (CIP 52.0302) program of study.

Citation:

Perkins § 135 (b)(3) and N.J.A.C. 6A:19-4, Structured Learning Experiences

Required Action:

The district must offer students enrolled in Career and Technical Education programs opportunities to explore all aspects of their career programs through participation in structured learning experiences linked to the New Jersey Student Learning Standards in all approved CTE programs. The district may contact its Perkins program officer for technical assistance.

Finding 14:

The district did not provide evidence that professional development related to career and technical education was provided for all CTE teachers.

Citation:

Perkins § 134(b)4 and Perkins § 135(b)5

Required Action:

The district must create opportunities for teachers to receive professional development related to career and technical education. The district must ensure that completed sign-in sheets, as well as agendas are maintained for professional development activities supported by Perkins grant funds.

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Administrative

Finding 15:

The district did not comply with required timekeeping standards for federally funded grants. Employees with 100 percent of their salary paid with Title I funds must complete a semi-annual certification attesting to their performance of Title I related duties, and employees with less than 100 percent of their salary paid with Title I funds must complete monthly personal activity reports.

Citation:

Uniform Grant Guidance 2 C.F.R. 200.302

Required Action:

The district must ensure that employees submit personal activity reports that have been verified by supervisors, as required.

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.nj.gov.