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Department of Education  
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**South Plainfield School District**  
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*New Jersey K to 12 Education*

Collaborative Monitoring Report  
July 2019

**District:** South Plainfield School District  
**County:** Middlesex  
**Dates On-Site:** April 9, 10 and 11, 2019  
**Case #:** CM-004-19

Program	Funding Sources	Funding Award
Title I, Part A		\$365,965
IDEA Basic		832,922
IDEA Preschool		35,317
Title II, Part A		86,853
Title III		19,267
Title III Immigrant		11,598
Title IV, Part A		17,176
	Total Funds	<hr/> <u>\$1,369,098</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 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 South Plainfield 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; Title III Immigrant; Title IV, Part A (Title IV) and IDEA Basic and Preschool for the period July 1, 2018 through March 31, 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 III Immigrant; Title IV and IDEA Basic and Preschool from July 1, 2018 through March 31, 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 uses Title I funds for teacher salaries, stipends, professional development and supplies.

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**Title II-A Projects**

The district uses Title II-A funds to support professional learning communities and professional development practices including additional math and English, language arts instructional strategies and techniques. The district also uses a robust data collection to inform teachers and students of progress towards academic and performance goals.

**Title III Projects**

The district uses the Title III funds are for professional development and supplies to support district programs.

**Title IV-A Projects**

The district uses Title IV-A funds for parent programs related to Cyberbullying.

**IDEA Projects (Special Education)**

The FY 2019 IDEA funds are being used to reduce district tuition expenditures for students receiving special education services in approved private schools for students with disabilities and are also being used for professional development and instructional supplies and materials for staff members supporting students with disabilities. Additionally, IDEA funds are being expended to support students with service plans in nonpublic settings.

**Detailed Findings and Recommendations**

**Title I**

**Finding 1:**

The district did not have an updated district-level Parent and Family Engagement Policy in compliance with ESSA, developed jointly with, agreed on with, and distributed to, parents and family members of participating children. Parents were not notified of the availability of this policy in an understandable and uniform format in a language parents can understand.

**Citation:**

ESEA§1116(A)(2) [20 U.S.C. 6318] Parent and Family Engagement

**Required Action:**

The district shall develop jointly with, agree on with, and distribute to, parents and family members of participating children a written district-level parent and family engagement policy. Parents shall be notified of the policy in an understandable and uniform format and, to the extent practicable, provided in a language the parents can understand. The district must provide evidence of a board approved, district-level Parent and Family

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Engagement Policy for review to NJDOE, along with evidence of parent input in the development of the policy, and availability of the policy in an understandable and uniform format in a language parents can understand.

**Finding 2:**

Parents in Title I schools were not notified that school-level parent and family engagement policies and compacts were available in an understandable and uniform format and, to the extent practicable, provided in a language the parents can understand.

**Citation:**

ESEA §1116(B) School Parent and Family Engagement Policy

**Required Action:**

The district shall provide evidence that it has put in place measures to ensure all school-level parent and family engagement policies and compacts will be developed in consultation with parents and made available in an “understandable and uniform format and, to the extent practicable, provided in a language the parents can understand.”

**Recommended Actions:**

***Parent and Family Engagement***

- Ensure that the district and its Title I schools work with their stakeholder groups to develop and revisit the district- and school-level policies and compacts annually.
- Ensure Parent and Family Engagement policies are board-approved annually to meet the changing needs of parents and the school.
- Make school-level policies available to the local community.
- Refer to [Title I Parent and Family Engagement Requirements and sample policies](#) for assistance: <http://www.state.nj.us/education/title1/program/parent>
- Annually distribute, within four weeks of the beginning of the school year, parent-engagement policies and compacts to parents of participating Title I children by means such as mail, e-mail, backpack or through a school booklet, such as in the school code handbook. Continue to post the policies on your district/school web site.
- Consider including in the parent-school compacts a link to the district-level parent and family engagement policy with instructions on how to obtain a printed copy if needed.

**Needs Assessment Stakeholder Groups**

Expand stakeholders to include additional community partners/community-based organizations/community members and/or early childhood education programs when applicable in convening meetings of stakeholders to participate in the Comprehensive Needs Assessment for the district plan in the ESEA Consolidated Subgrant Application.

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**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 III Immigrant**

A review of the expenditures charged to the Title III Immigrant 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 3:**

The district did not consistently document in the IEPs of students removed from the general education setting for more than twenty percent of the school day, including students placed in separate settings, consideration of placement in the least restrictive environment (LRE). Specifically, IEPs did not consistently include the supplementary aids and services considered and an explanation of why the supplementary aids and services were rejected; 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(i),(ii) and (iii)

**Required Action:**

The district shall ensure that 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 twenty percent of the school day. 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. 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 a site visit to interview staff, review the revised IEPs, along with a random sample of IEPs for students whose annual

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review meetings were conducted between November 2019 and January 2020 and review the oversight procedures. Names of the students with IEPs that were identified as noncompliant will be provided to the district by the special education monitor.

**Finding 4:**

The district did not consistently document general education teachers and special education teachers were in attendance at annual review, reevaluation planning, and eligibility and IEP meetings for students eligible for special education and related services. Additionally, the district did not consistently ensure that the full child study team was in attendance at identification meetings for students referred for special education and related services.

**Citation:**

N.J.A.C. 6A:14-2.3(k)1(i-vii)

**Required Action:**

The district must ensure that 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 files. 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 meeting documentation for meetings conducted between November 2019 and January 2020 and review the oversight procedures.

**Finding 5:**

The district did not consistently complete transition planning for students ages 14 and above and document decisions in the IEP. Specifically, the district did not consistently document the name or position of a staff person responsible to serve as liaison to post-secondary resources.

**Citation:**

N.J.A.C. 6A:14-3.7(e)11

**Required Action:**

The district must ensure that transition is discussed at each IEP meeting for students age 14 or above, and that decisions are documented in the IEP. 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 a site visit to interview staff, review the revised IEPs, along with a random sample of IEPs for students whose annual review meetings were conducted between November 2019 and January 2020 and review

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the oversight procedures. Names of the students with IEPs that were identified as noncompliant will be provided to the district by the special education monitor.

**Finding 6:**

The district did not consistently maintain documentation of the frequency and duration of the interventions provided in the general education setting through the Intervention and Referral Service (I&RS) process.

**Citation:**

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

**Required Action:**

The district must ensure that when the I&RS team identifies interventions to meet the needs of a struggling learner that the team identifies and maintains documentation of the nature, description, frequency, and duration of the interventions and measures the effectiveness. In order to demonstrate correction of noncompliance, the district must conduct training for administrators and I&RS staff 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 I&RS team members and teachers, review documentation for students who were provided interventions in general education between November 2019 and January 2020 and review the oversight procedures.

**Administrative**

**Finding 7:**

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.

**Finding 8:**

The board minutes contained some but not all the required information such as account number, position, annual/funded salary and percentage charged for federally funded positions. Also, the board minutes contained - for stipend compensation - some but not all of the required information such as account number, position, hourly rate, number of hours and not to exceed amount.

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**Citation:**

Uniform Grant Guidance 2 C.F.R. 200.302

**Required Action:**

The district should update its internal controls to ensure that the board minutes contain the required information.

**Finding 9:**

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 (609) 376-3593 or via email at [steven.hoffmann@doe.nj.gov](mailto:steven.hoffmann@doe.nj.gov).