

**State of New Jersey  
Department of Education  
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**Florence Township School District**  
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*New Jersey K to 12 Education*

**Collaborative Monitoring Report**  
June 2020

**District:** Florence Township School District  
**County:** Burlington  
**Dates On-Site:** February 4 and 5, 2020  
**Case #:** CM-009-20

**Funding Sources**

Program	Funding Award
Title I, Part A	\$ 326,329
IDEA Basic	493,521
IDEA Preschool	28,045
Title II, Part A	39,871
Title III	9,561
Title III Immigrant	3,101
Title IV, Part A	19,259
Total Funds	<u><u>\$919,687</u></u>

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**Background**

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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**

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The NJDOE visited the Florence 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 III Immigrant, Title IV, Part A (Title IV), and IDEA Basic and Preschool for the period July 1, 2019 through January 31, 2020.

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 (IEPs), 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**

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The grants reviewed included Title I, Title II, Title III, Title III Immigrant, Title IV, and IDEA Basic and Preschool from July 1, 2019 through January 31, 2020. A sampling of purchase orders and/or salaries was taken from each program reviewed.

**General District Overview of Uses of Federal Funds**

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**Title I Projects**

The district is using its 2019-2020 Title I funds to implement targeted assistance programs in both the elementary and middle schools. The district provides supplemental services through in-class support, pullout programs, after-school and extended year programs.

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**Title II-A Projects**

The district uses their Title II-A allocation for professional development to support English Language Arts (ELA), mathematics, building academic and social emotional competencies and to train teachers how to use the equipment in the media lab.

**Title III Projects**

The district refused its 2019-2020 Title III funds because they were unable to join a consortium.

**Title III Immigrant Projects**

The district is using its 2019-2020 Title III Immigrant funds to provide supplemental ELA and math programs and engage parents and families of immigrant children and youth to support the development of curriculum.

**Title IV-A Projects**

The district uses their Title IV-A allocation to expand the engineering and STEM programs and to provide professional development on the importance of recognizing and addressing mental health challenges.

**IDEA Grant**

The FY 2020 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 to fund an afterschool program for students with disabilities, instructional supplies and materials for staff members supporting students with disabilities. There were no findings with the IDEA grant.

**Detailed Findings and Recommendations**

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**Title I**

The review of Title I expenditures yielded no findings.

**Title II-A**

**Finding 1:**

The *Code of Federal Regulations (CFR)* requires frequent reimbursement requests from the District to the State. The Florence Township School District received a Title II-A allocation and as of the monitoring visit had not requested one reimbursement. The Uniform Grant Guidance anticipates monthly reimbursement to ensure programs are taking place.

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**Citation:**

2 CFR-200.303: *Internal Controls*

2 CFR 200.305: *Payment*

**Required Action:**

The district must establish and maintain effective internal control over the Federal award that provides reasonable assurance that the district is managing the Federal award in compliance with Federal statutes, regulations, and the terms and conditions of the Federal award. These internal controls should be in compliance with guidance in “Standards for Internal Control in the Federal Government” issued by the Comptroller General of the United States or the “Internal Control Integrated Framework”, issued by the Committee of Sponsoring Organizations of the Treadway Commission (COSO). The district will provide evidence of payments and internal control documentation that indicates the frequency of when reimbursement requests will be submitted.

**Title III**

Not Applicable – Funding refused.

**Title III Immigrant**

The review of Title I expenditures yielded no findings.

**Title IV-A**

**Finding 1:**

The *Code of Federal Regulations (CFR)* requires frequent reimbursement requests from the District to the State. The Florence Township School District received a Title IV-A allocation and as of the monitoring visit had not requested one reimbursement. The Uniform Grant Guidance anticipates monthly reimbursement to ensure programs are taking place.

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of Sponsoring Organizations of the Treadway Commission (COSO). The district will provide evidence of payments and internal control documentation which indicates the frequency of when reimbursement requests will be submitted.

**IDEA Program**

**Finding 1:**

The district did not consistently maintain documentation of the frequency, duration and effectiveness 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 interventions are provided in the general education setting for students exhibiting academic and/or behavioral difficulties prior to referring the student for an evaluation. In addition, 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 frequency, duration and effectiveness of the interventions. 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 and to review documentation of students who were provided interventions in general education between May 2020 and September 2020 and review the oversight procedures.

**Finding 2:**

The district did not consistently document general education teachers and special education teachers who were in attendance at 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

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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, including sign-in sheets, for meetings conducted between May 2020 and September 2020 and review the oversight procedures.

**Finding 3:**

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.

**Citation:**

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

**Required Action:**

The district must ensure that all components of the functional assessment are conducted as part of the initial evaluation process. 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 initial evaluation reports completed between May 2020 and September 2020 and review the oversight procedures.

**Finding 4:**

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 include a statement of the student's strengths, interests and preferences; a description of the need for consultation with other agencies, if applicable; the name or position of a staff person responsible to serve as liaison to post-secondary resources and a statement of needed interagency linkages and responsibilities in the IEP.

**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 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 whose IEPs were identified as noncompliant. A monitor from the NJDOE will conduct a site visit to interview staff, review the revised IEPs, together with a random sample of IEPs, developed between May

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2020 and September 2020 and review the oversight procedures. Names of the students whose IEPs were identified as noncompliant were provided to the district by the special education monitor.

**Finding 5:**

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, for students in a separate setting, the district did not consistently set forth activities necessary to move the student to a less restrictive placement.

**Citation:**

N.J.A.C. 6A:14-4.2 (a) 8(i), (ii) and (iii), N.J.A.C. 6A:14-4.2 (a) 4

**Required Action:**

The district must 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. 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 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 visit to interview staff, review the revised IEPs, a random sample of additional IEPs developed at meetings conducted between May 2020 and September 2020 and review the oversight procedures. Names of the students whose IEPs were identified as noncompliant were provided to the district by the special education monitor.

**Finding 6:**

The district did not consistently provide to students eligible for special education and related services written notice of graduation containing all required components within required timelines.

**Citation:**

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

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**Required Action:**

The district must ensure that parents or adult students are provided with written notice of graduation containing all required components prior to graduation. 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 above-referenced requirements set forth in the administrative code. A monitor from the NJDOE will conduct a site visit to interview staff, review written notice of graduation provided to students with disabilities who will graduate at the conclusion of the current school year, and review the oversight procedures.

**Administrative**

**Finding 1:**

For employees charged to federal grants, the board minutes contained some, but not all of the required information such as funding grant, account number, position, annual/funded salary and percentage charged.

**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.

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).