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Department of Education  
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Haledon Public School District  
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*New Jersey K to 12 Education*

Collaborative Monitoring Report  
June 2020

**District:** Haledon Public School District  
**County:** Passaic  
**Dates On-Site:** January 21 and 22, 2020  
**Case #:** CM-011-20

**Funding Sources**

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Program	Funding Award
Title I, Part A	\$508,168
IDEA Basic	239,624
IDEA Preschool	11,938
Title II, Part A	30,600
Title III	13,033
Title III Immigrant	4,393
Title IV, Part A	31,685
Total Funds	<u><u>\$839,441</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 subrecipients 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 Haledon 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; Title III Immigrant, Title IV, Part A (Title IV); and IDEA Basic and Preschool for the period July 1, 2019 through December 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**

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The grants reviewed were Title I, Title II, Title III, Title III Immigrant, Title IV, and IDEA Basic and Preschool from July 1, 2019 through December 31, 2019. 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 Haledon School District is a one-school district that serves grades Pre-K-8. Haledon Elementary School is designated as a targeted support and improvement school and operates a Title I schoolwide program. During the 2019-2020 school year, the district utilized its Title I,

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Part A allocation for the following activities: 1) instructional staff; 2) instructional materials; 3) supplies; and 4) and parent and family engagement activities.

**Title II-A Projects:**

The Haledon School District provides professional growth and development in a variety of ways. There is extensive embedded professional development through staff collaboration with both math and literacy coaches and staff are encouraged to seek out professional development opportunities to meet their individual needs, whether that may be through a conference, course, or workshop.

**Title III and Title III Immigrant Projects**

Due to the emergency closure of New Jersey Public Schools the review of Title III and Title III Immigrant could not be completed.

**Title IV-A Projects:**

The Haledon School District uses the Title IV-A allocation for multiple PBSIS initiatives and an after-school band program.

**IDEA Grant**

The Haledon School District is utilizing their IDEA funds to reduce district tuition costs for students receiving special educational services in other public school districts and approved private schools for the disabled and for the provision of the extended school year for students with disabilities.

**Detailed Findings and Recommendations**

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**Title I**

**Finding 1:**

Haledon Public Schools provided evidence of an existing policy for the Educational Stability of Children in Foster Care; however, a designated staff person was not appointed to serve as the district's Foster Care Liaison.

**Citation:**

ESEA §1112 (c)(5)(A): *Local Educational Agency Plans (Assurances)*

**Required Action:**

Haledon Public Schools must designate a staff person to serve as the district's Foster Care Liaison and post this information on the district's website. The name of the designee must be identified in the CDS file, with a printout available for review.

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**Recommended Action:**

Haledon Public Schools is encouraged to access the NJDOE website [Educational Stability for Children in Foster Care](#) for specific information regarding the establishment of its Educational Stability policies and procedures, as well as the responsibilities of the district Foster Care liaison.

**Finding 2:**

Haledon Public Schools was unable to provide sufficient evidence to verify that all parent notification documents are available in languages representative of the school population.

**Citations:**

ESEA §1112(e): *Local Educational Agency Plans (Parents Right-to-Know)*; ESEA §1116(b): *School Parent and Family Engagement Policy*

**Required Action:**

Haledon Public Schools must establish processes to ensure all required parent and family engagement documents are translated into languages that are understandable to the parents of the served students. These translated documents must appear on the district's website, along with the English versions. The following parent and family engagement documents must be in multiple languages:

- District- and school-level policies
- Invitational letters/fliers
- School-Parent Compact
- Annual Title I Parent Meeting Agenda
- Parents' Right to Know Letter
- Title I Parent Notification of Services
- Notification to Parents of English Learner students

**Recommended Action:**

To further enhance knowledge regarding meaningful and timely parent and family engagement, it is recommended that Haledon Public Schools' staff review the parent and family engagement resources available on the NJDOE website at [Title I, Part A Parent Family Engagement](#). For each Title I-funded parent and family engagement activity, Haledon Public Schools must maintain on file the agenda, sign-in sheets, and meeting minutes as record of the funded activity. For additional assistance, please contact the Office of Supplemental Educational Services at [titleone@doe.nj.gov](mailto:titleone@doe.nj.gov).

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**Finding 3:**

Haledon Public Schools did not provide documented evidence that the school-parent compact was developed in conjunction with Title I parents and families. The absence of parent and family participation in developing this required document has the potential to exclude some parents and families from active participation in their children’s educational programs.

**Citation:**

ESEA §1116(c) and (d): *Policy Involvement and Shared responsibilities for High Student Academic Achievement*

**Required Action:**

For the 2020-2021 school year, the school must include parents and families in the development of the required school-parent compact. This work must be documented by agenda, meeting minutes, and sign-in-sheets, all of which must be kept on file in the school and upon request, made available to the New Jersey Department of Education (NJDOE).

**Finding 4:**

The district did not provide documented evidence that the school convened an annual Title I parent meeting. The annual Title I parent meeting must be held at the beginning of the school year. The purpose of the meeting is to discuss and explain the Title I program and/or services to parents and provide parents with an opportunity to become actively engaged in helping their children succeed academically.

**Citation:**

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

**Required Action:**

For FY 2020-2021, the school must convene the Annual Title I parent meeting for the parents and families of participating students no later than Mid-October 2020. The district must keep on file documentation of the Annual Title I parent meeting, to include, but not limited to, invitational letter/flyer, agenda, meeting minutes, and sign in sheets.

**Title II-A**

**Finding 1:**

The *Code of Federal Regulations (CFR)* requires frequent (monthly) reimbursement requests from the District to the State. The Haledon School District received a Title II-A allocation of \$56,520 and as of the monitoring visit did not request one reimbursement. The Uniform Grant Guidance anticipates monthly reimbursement to ensure programs are taking place. The lack of frequency of reimbursement requests is also a risk indicator.

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**Citations:**

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 comply 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.

**Finding 2:**

The Haledon School District is required to engage in ongoing consultation throughout the year with stakeholders to improve the local activities in order to meet the purpose of Title II, Part A and to coordinate such implementation with other related strategies, programs and activities being conducted in the community.

**Citation:**

*ESEA §2102(b)(3)(A-C)*

**Required Action:**

The district must provide a list of meeting dates and an agenda of stakeholder meeting dates for the remainder of this school year and planned dates for the 2020-2021 school year. If any meetings have taken place by the time of the follow-up visit, sign-in sheets must be provided. Include a summary of survey results if applicable.

**Finding 3:**

The Haledon School District is required to have an annual professional development plan that is created, implemented and signed by the superintendent. The local Board of Education is required to approve the fiscal impacts of the plan.

**Citations:**

*ESEA §2102(b)(2)(A-B)*

*N.J.A.C. 6A:9-15.6*

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**Required Action:**

The district must create an annual district professional development plan (PDP) that aligns with [New Jersey's Definition of Professional Development](#) and the [New Jersey Standards for Professional Learning](#). The district PDP must be completed annually, but it should be seen as a living document that can be revised whenever educator practice and/or student achievement data indicate the need. An optional template is provided on the [New Jersey Department of Education Professional development website](#) <https://www.nj.gov/education/profdev/sdpdp/> to assist districts in fulfilling New Jersey's professional development requirements. Districts may use or modify this template or create their own.

**Title IV-A**

**Finding 1:**

The *Code of Federal Regulations (CFR)* requires frequent (monthly) reimbursement requests from the District to the State. The Haledon School District received a Title IV-A allocation of \$31,685 and as of the monitoring visit did not request one reimbursement. The Uniform Grant Guidance anticipates monthly reimbursement to ensure programs are taking place. The lack of frequency of reimbursement requests is also a risk indicator.

**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 comply 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.

**Finding 2:**

Districts that receive a Title IV-A program allocation of at least \$30,000 must conduct a comprehensive needs assessment prior to receiving its allocation. A subsequent needs assessment to examine its needs for improvement of the activities must be conducted at least once every three years.

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**Citation:**

*ESEA §4106(d): Needs Assessment*

**Required Action:**

The district must create a Comprehensive Needs Assessment in collaboration with stakeholders. If the district consults with stakeholders and concludes that some or all Title IV, Part A funds should be transferred to another title, the Needs Assessment must reflect the reason for transferring the funds. The *National Center on Safe Supportive Learning Environments* has created a free [Title IVA, Part A Needs Assessment Tool](https://safesupportivelearning.ed.gov/title-iv-part-lea-needs-assessment-tool) for districts and schools that wish to use it. The tool can be found at:

<https://safesupportivelearning.ed.gov/title-iv-part-lea-needs-assessment-tool>.

**Finding 3:**

The local educational agency, or consortium of such agencies, shall engage in ongoing consultation with the stakeholder entities to improve the local activities in order to meet the purpose of Title IV, Part A and to coordinate such implementation with other related strategies, programs and activities being conducted in the community. Students are required to participate in the discussions and decisions regarding the use of the Title IV, Part A funds.

**Citation:**

*ESEA §4106(c)(1-2): Consultation*

**Required Action:**

The district must provide a list of meeting dates and an agenda of stakeholder meeting dates for the remainder of this school year and planned dates for the 2020-2021 school year. If any meetings have taken place by the time of the follow-up visit, sign-in sheets must be provided. Include a summary of survey results if applicable.

**IDEA Program**

**Finding 1:**

The district did not consistently document in the IEPs of students removed from the general education setting for more than twenty (20) 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:

- supplementary aids and services considered and an explanation of why they are not appropriate;
- comparison of the benefits provided in the regular class and the benefits provided in the special education class;



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- potentially beneficial or harmful effects which a placement (general education) may have on the student with disabilities or the other students in the class;
- for those students placed in separate settings, activities to transition the student to a less restrictive environment.

**Citation:**

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 (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 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 additional IEPs developed at meetings conducted between December 2020 and March 2021, and 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 2:**

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.

**Citation:**

N.J.A.C. 6A:14-3.4(f)4(i –vi); 20 U.S.C. §1414(b)(1)-(3), 1412(a)(6)(b); 34 CFR 300.304(b)(1)

**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 speech-language specialists 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

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evaluation reports for students whose eligibility meetings were held between December 2020 and March 2021, and review the oversight procedures.

**Finding 3:**

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:14-2.5(b)6, 3.4(g)3 and d 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 NJDOE will conduct a site visit to interview staff, review initial evaluation reports for students referred for speech-language services whose eligibility meetings were held between December 2020 and March 2021, and review the oversight procedures.

**Administrative**

**Finding 1:**

Equipment purchased with Federal funds did not have visible, permanently attached, numbered inventory tags indicating the federal funding source.

**Citation:**

Uniform Grant Guidance 2 C.F.R. 200.313.

**Required Action:**

The district must place visible, permanently attached, numbered inventory tags with federal funding source on all equipment purchased with federal funds.

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).