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Hampton Township School District
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New Jersey K to 12 Education

Collaborative Monitoring Report
June 2020

District: Hampton Township School District
County: Sussex
Dates On-Site: March 3, 4 and 5, 2020
Case #: CM-012-20

Funding Sources

Program	Funding Award
Title I, Part A	\$ 37,362
IDEA Basic	111,671
IDEA Preschool	11,606
Title II, Part A	10,245
Title IV, Part A	18,848
Total Funds	<hr/> \$189,732 <hr/>

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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 purposes and achieving the overall objectives of the funding initiatives.

Introduction

The NJDOE visited the Hampton Township School District (the 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 IV, Part A (Title IV); and IDEA Basic and Preschool for the period July 1, 2019 through February 29, 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

The grants reviewed included Title I, Title II, Title IV, and IDEA Basic and Preschool from July 1, 2019 through February 29, 2020. A sampling of purchase orders and/or salaries was taken from each program reviewed.

General District Overview of Uses of Federal Funds

Title I Projects

The district operates a Title I targeted assistance program and uses its Title I funds for the following activities: 1) Tutoring services provided after-school 2) Instructional supplies and materials. **Please Note:** The Hampton Township School District has experienced significant turnover in the school business administrator position. The current school business administrator is the fourth (4th) person to hold this position in the last four (4) years.

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Title II-A Projects:

Title II-A funds were used to provide professional development in Science, Technology, Engineering and Math (STEM) for teachers. The current Elementary and Secondary Education Act (ESEA) Application also states that funds will be used for professional development in the Orton Gillingham strategies for Language Arts Literacy.

Title IV-A Projects:

Title IV-A funds were allocated to support STEM activities for students, participation in an anti-bullying presentation and for 6th grade students to attend an anti-bullying summit. The school is working on social emotional learning (SEL) strategies during this school year. These activities were interrupted when schools closed due to the COVID-19 pandemic.

IDEA Projects (Special Education)

IDEA funds are utilized for special education extended school year program as well as child study team evaluations. IDEA funds are also utilized for therapy services provided directly to students with disabilities.

Detailed Findings and Recommendations

Title I

Finding 1:

As articulated in the district's FY 2020 ESEA Consolidated Subgrant Application, the Needs Assessment indicated Title I funds would address the following identified needs:

- "Professional Development" in the academic areas of mathematics, English language arts literacy, and science
- "After-School Experiences" in mathematics, reading, and science

Unfortunately, the selected allowable uses and budgeted costs did not directly align with the above referenced identified needs. Without a direct connection among identified needs, allowable uses, and budgeted costs, there is no evidence that implemented activities are necessary and reasonable for proper and efficient performance and administration of the district's Title I schoolwide program.

Citations:

ESEA §1112 Local Educational Agency Plans; Uniform Grant Guidance Cost Principles for State, Local and Indian Tribal Governments (Necessary and Reasonable).

Required Action:

For the 2020-2021 school year, the district must develop processes to ensure a direct connection among identified needs, allowable uses, and budgeted costs, to show evidence

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that implemented activities are necessary, reasonable, and allocable to meet the intent and purposes of the Title I, Part A grant program.

Recommended Action:

It is recommended the district ensure the information contained in the Needs Assessment is more specific and quantifiable in nature. This may be accomplished by providing both quantitative and qualitative details regarding each identified need, to include, but not limited to, 1) subgroup demographics; 2) grade levels; 3) focus group results and 4) parent and family, staff, and/or student survey information. In addition, the district must ensure it lists “identified needs,” not programs, to be implemented to address the need, as was the case with the entry of “after-school experiences.”

Finding 2:

The district operates a targeted assistance school program, which means **ONLY** the identified, academically at-risk students, their teachers and parents/families, can receive benefit of services funded with Title I, Part A funds. Unfortunately, the district utilized its Title I, Part A funds for the following programs which were implemented for all students, staff, and parents/families: 1) Schoolwide anti-bullying program; 2) Learning A-Z; 3) Study Island; 4) Renaissance; and 5) Brain Pop. In addition, the district selected “In-Class Support – Additional Teacher” and “Equipment” as Title I allowable uses; however, Title I, Part A funds were not budgeted for either selected allowable use.

Citations:

ESEA §1112 Local Educational Agency Plans; Uniform Grant Guidance Cost Principles for State, Local and Indian Tribal Governments (Necessary and Reasonable); ESEA §1115(c) Targeted Assistance Schools: Eligible Children

Required Action:

The district must reverse all Title I expenditures for the above listed programs and/or services and re-budget these funds, if possible, during the FY 2020 ESEA project period. If these funds cannot be re-budgeted in FY 2020, the district has the option to carry these funds forward into the FY 2021 ESEA project period to re-budget for Title I, Part A allowable uses that align with that project period’s Needs Assessment. When completing the FY 2021 ESEA Consolidated Subgrant Application, the district must ensure it does not select Title I, Part A allowable uses for which it does not budget Title I, Part A funds.

Recommended Action:

In completing the 2020-2021 Title I Budget section of the FY 2021 ESEA Consolidated Subgrant Application, the district should provide specific descriptions to detail an itemization of costs, per budget line. Currently, in the FY 2020 ESEA Consolidated Subgrant Application, the district described \$16,542 in budget line 100-600 as

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“Instructional Supplies” and \$8,000 in budget line 200-300 as “Professional Development.” In both cases, these descriptions did not provide sufficient detail to determine what type of instructional supplies and materials would be purchased with Title I funds, nor what kind or area of professional development would be provided to teachers of the identified, academically at-risk students. This lack of details makes it impossible to determine if these proposed costs are allowable under the Title I, Part A program.

Finding 3:

The district did not provide documented evidence of its annual Title I meeting for parents and families of participating children, to include: 1) invitational letter/flyer; 2) meeting agenda; 3) meeting minutes; and 4) sign-in sheets. Per the ESEA legislation, a Title I served school must convene an annual meeting, to inform the parents and families of the school’s Title I, Part A program(s), legislative requirements, and ways in which they can be engaged actively in helping their children succeed academically.

Citation:

ESEA §1116(c): Parent and Family Engagement Policy Involvement

Required Action:

For the 2020-2021 school year, the district must hold its required annual Title I meeting for parents and families of children participating in its Title I programs, and keep documented evidence of this meeting on file, for review by the Office of Supplemental Educational Programs, upon request.

Finding 4:

The district did not provide evidence of a district-school level parent and family engagement policy, to include elements for school-level parent and family engagement. Specifically, the documented evidence did not include the following items:

- Correct ESEA parent and family engagement citations;
- Correct school-level policy requirements;
- Date of Board approval and adoption of the district-level parent and family engagement policy; and
- Date on which the district-school level policy was distributed to parents and families.

Per ESEA legislation, parents and families must be involved in the development of the written district-school level parent and family engagement policy.

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Citations

ESEA §1116 (a)(2) Local Educational Agency Policy: Written Policy; ESEA §1116(b)(1): School Parent and Family Engagement Policy

Recommended Action:

For the FY 2021 ESEA project period, the district must engage parents and families in the development of a district-school level parent and family engagement policy. Upon Board approval of the district-school level parent and family engagement policy the district must ensure it distributes this policy to parents and families of participating Title I students. Documented evidence of the distribution of this district-school level parent and family engagement policy, in an understandable and uniform format, must be kept on file in the district and submitted to the Office of Supplemental Educational Programs upon request, if necessary.

Finding 5:

The district did not provide documented evidence of the development and distribution of its school-parent compact. The school-parent compact must outline how parents, the entire district staff, and students will share the responsibility for improved student academic achievement and the means by which the district and parents will build and develop a partnership to help children achieve the challenging State academic standards. The exclusion of parents and families in the development of the school-parent compact resulted in these stakeholders being excluded from active participation in their children's educational programs.

Citation:

ESEA §1116(d)(2): Parent and Family Engagement (Shared responsibilities for High Student Academic Achievement)

Required Action:

For the 2020-2021 school year the district must develop jointly, agree on, and distribute to parents and families of participating children its written school-parent compact. Parents and families shall be notified of the school-parent compact in an understandable and uniform format and, to the extent practicable, provided in a language they can understand. The district must keep on file documentation to verify the distribution of the school-parent compact to the parents and families of participating children. This documentation must be made available to the Office of Supplemental Educational Programs, upon request.

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Recommended Action:

To further enhance knowledge regarding meaningful and timely parent and family engagement, it is recommended that the district staff review the parent and family engagement resources available on the NJDOE website at [Title I, Part A Parent Family Engagement](#). For additional assistance, please contact the Office of Supplemental Educational Programs at titleone@doe.nj.gov.

Finding 6:

The district did not provide documented evidence of the required Parent Right-to-Know letter and its distribution to all parents and families of participating children.

Citation:

ESEA §1112(e)(1): Parents Right to Know – Information for Parents

Required Action:

For the 2020-2021 school year, the district must distribute to the parents of all Title I students a dated Parent Right-to-Know letter. The district must keep documented evidence of the distribution of the dated Parent Right-to-Know letter, to include a list of parents receiving the letter. This documentation must be made available to the Office of Supplemental Educational Programs, upon request.

Finding 7:

The district did not provide documented evidence of the development and implementation of written policies and procedures on the educational stability of children in foster care, especially in regard to how transportation for these children will be provided, arranged, and funded for the duration of their time in foster care.

Citation:

ESEA §1112(c)(5)(B) Assurances – Written Policies and Procedures

Required Action:

The district must immediately develop and implement clear written policies and procedures regarding the educational stability of children in foster care, which must be presented to and approved by its Board of Education. The district must maintain documentation on file of this approval and adoption by the Board of Education, and upon request, make such documentation available to the Office of Supplemental Educational Programs.

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Recommended Action:

The district 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.

Finding 8:

The district did not provide documented evidence of the name of the Educational Stability Point of Contact (Liaison) for the district. The ESEA legislation stipulates that the district plan shall provide an assurance that the district will designate a point of contact, who will collaborate with the local child welfare agency regarding services for children in foster care.

Citation:

ESEA §1112(c)(5)(A) Assurances – Point of Contact

Required Action:

The district must immediately designate a staff person to serve as the Educational Stability Point of Contact (Liaison) for the district (if such person has not been already designated). Documented evidence of this must be kept on file in the district and, upon request, made available to the Office of Supplemental Educational Programs.

Finding 9:

The district did not provide documented evidence to support the timely notification of parents or adult students of their right to opt-out of Military notification. The district did not provide evidence regarding the processes and procedures to address the following military or college recruiter requirements:

- Method(s) of distribution of the Military Opt-Out form to parents and their children;
- Process(es) for maintaining a record of parents and students who requested to opt-out; and
- Verification process/system to show students' information was sent to military or college recruiters when requested.

Citation:

ESEA §8528-Armed Forces Recruiter Access to Students and Student Recruiting Information. – Military Opt-Out

Required Action:

For the 2020-2021 school year, the district must establish and implement policies and procedures regarding the district's obligation to provide timely notification to parents and adult students of their rights pertaining to military or college recruiter access to students and student recruiting information. A copy of the letter and copies of the completed opt-

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out forms must be kept on file and made available to the Office of Supplemental Educational Programs, upon request.

Finding 10:

The district did not provide documented evidence to verify that consultation with nonpublic school officials, from nonpublic schools both within and outside the district's boundaries, occurred prior to the beginning of the FY 2020 ESEA project period.

Citation:

ESEA §1117(b)(1)(A-L): Participation of Children Enrolled in Private Schools

Required Action:

The district must establish written processes for its Title I, Part A program, to outline the following in regard to nonpublic school consultation:

1. The steps the district will take to ensure nonpublic school consultation for a given project year begins no later than March of the previous year;
2. The responsibilities of both the public school and nonpublic school officials in agreeing to the provision of specific programs/services prior to the end of the consultation process; and
3. The uniform utilization of the Nonpublic Affirmation of Consultation and Nonpublic School Participation Refusal forms found on the NJDOE website at [Consultation Toolkit](#).

Recommended Action:

To enhance the nonpublic school consultation process, the district should consider providing a needs assessment template to the nonpublic school officials to ensure: 1) the needs of resident nonpublic school students are identified during consultation; and 2) agreement occurs regarding the types of programs/services that will be implemented to address the identified needs. An example of a needs assessment can be accessed at [Uses of ESEA Funds-Nonpublic School Planning Template](#).

Title II-A

Finding 1:

The 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)

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Required Action:

The district must provide a process and timeline for stakeholder engagement to ensure stakeholders are considered in the planning, review and evaluation of this program. Please see the following resource for [stakeholder engagement](#). 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.

Title II-A Recommendation:

Nonpublic Consultation:

Nonpublic school consultation occurred but was lacking supporting documentation. Create a consultation process to meet equitable services requirements. Consultation papers were provided but records were lacking regarding what was discussed for Titles II-A & IV-A. Some resources to assist with the planning are:

- [Non-Regulatory Guidance: Fiscal Changes and Equitable Services for Nonpublic School Requirements \(November 21, 2016\);](#)
- [Non-Regulatory Guidance for Title II, Part A: Building Systems of Support for Excellent Teaching and Leading \(September 27, 2016\);](#) and
- [Choosing Evidence-Based Practices](#)

Levels of Evidence:

- Strong – (Experimental Study)
- Moderate – (Quasi-experimental)
- Promising – (Correlational Study with Controls)
- Demonstrates a Rationale (logic Model)

Title IV-PART A

Finding 1:

The 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 IV, Part A and to coordinate such implementation with other related strategies, programs, and activities being conducted in the community. The stakeholder group must include at least one student.

Citation:

ESEA §4106(c)(1-2)

Required Action:

The district must provide a process and timeline for stakeholder engagement to ensure stakeholders are considered in the planning, review and evaluation of this program. Please see the following resource for [stakeholder engagement](#). If any meetings have taken

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place by the time of the follow-up visit, sign-in sheets must be provided. Include a summary of survey results if applicable.

IDEA (Special Education)

IDEA funds are utilized for special education extended school year program as well as child study team evaluations. IDEA funds are also utilized for therapy services provided directly to students with disabilities.

Finding 1:

The district did not consistently ensure that the required participants were in attendance at identification meetings for students referred and/or eligible for special education and related services and students referred and/or eligible for speech-language services.

Citations:

N.J.A.C. 6A:14-2.3(k); 20 U.S.C. §1414(b)(4); and 34 CFR §300.321(a)

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 provide 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 NJDOE will conduct a site visit to interview staff, review meeting documentation, including meeting sign-in sheets, for meetings conducted between December 2020 and March 2021, and review the oversight procedures.

Finding 2:

The district did not conduct meetings within 20 calendar days of receipt of a written request for a speech-language evaluation to determine if an evaluation was warranted.

Citation:

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

Required Action:

The district must ensure that identification meetings are conducted within 20 calendar days of receipt of a written request for evaluation and that required participants are in attendance. 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 interview staff, review documentation from meetings conducted between December 2020 and March 2021, and review the oversight procedures.

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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 and for students referred for speech-language services.

Citation:

N.J.A.C. 6A:14-3.4(f)4(i-vi), (g) 1-4

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

Finding 4:

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.

Citations:

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 citations listed above. A monitor from the 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.

Finding 5:

The district did not consistently determine eligibility collaboratively for students referred for speech-language services. Speech-language specialists are determining eligibility in evaluation reports rather than at a properly configured eligibility meeting with appropriate IEP members.

Citations:

N.J.A.C. 6A:14-3.3(e), 3.6(c)

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Required Action:

The district must ensure that eligibility for speech-language services is determined collaboratively at an appropriately configured meeting. 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. A monitor from the 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.

Finding 6:

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 (LRE). IEPs did not consistently include the comparison of the benefits provided in the regular class and the benefits provided in the special education class.

Citation:

N.J.A.C. 6A:14-4.2(a)8(ii)

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 20 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 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 special education monitor.

Finding 7:

The district did not consistently document all required considerations and statements in each IEP for students eligible for speech-language services. Specifically, IEPs did not consistently include:

- Documentation of participation of district-wide and state-wide assessment; and
- Statement of how the student's disability affects the student's involvement and progress in the general education curriculum.

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Citations:

N.J.A.C. 6A:14-3.7(c), E6 and 7, and (f)

Required Action:

The district must ensure that that 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 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 IEPs developed at meetings conducted between December 2020 and March 2021, and review the oversight procedures. Names of the students whose IEPs were identified as noncompliant will be provided to the district by the special education monitor.

Administrative

Finding 1:

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

Finding 2:

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.

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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.