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Department of Education  
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Willingboro Public School District

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*New Jersey K to 12 Education*

Collaborative Monitoring Report  
June 2021

**District:** Willingboro Public School District  
**County:** Burlington  
**Dates Monitored:** March 30, 31 and April 1  
**Case #:** CM-10-21

**Funding Sources**

Program	Funding Award
Title I, Part A	\$1,055,098
Title I SIA	168,842
Title II	230,248
Title III	15,445
Title III Immigrant	4,958
IDEA Basic	1,289,076
IDEA Preschool	50,693
Digital Divide	798,041
ESSER	696,671
Total Funds	<u>\$4,309,072</u>

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**Background**

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The Every Student Succeeds Act (ESSA), the Individuals with Disabilities Act (IDEA) and other federal laws require local education agencies (LEAs) to provide programs and services to districts within their local jurisdiction. The provision of these programs and services is based on the requirements as specified in each of the pertinent authorizing statutes (ESSA, IDEA or other federal law(s)).

The laws further require that state education agencies, in this case, the New Jersey Department of Education (NJDOE) to monitor the implementation and execution of federal programs by the sub recipients. The monitors thereby determine whether the funds are being properly used by the district for their intended purposes and achieving the overall objectives of the funding initiatives.

**Introduction**

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The NJDOE visited the Willingboro Public School District (district) to monitor the district's use of federal funds. It also monitors related program plans, as applicable, to determine whether the district's programs are meeting the intended purposes and objectives, as specified in the current year's applications and authorizing statutes.

The goal of the monitoring is to determine whether the funds were spent in accordance with the program's requirements, federal and state law and applicable regulations.

The on-site visit included: staff interviews and document and documentation reviews related to the requirements of the following programs: Title I, Part A (Title I); Title I SIA; Title II, Title III, Title III immigrant, Digital Divide grant, Elementary & Secondary School Emergency Relief Fund (ESSER), IDEA Basic and Preschool for the period July 1, 2020 through February 28, 2021.

The scope of work performed included the review of documents and documentation which included:

- accounting records
- annual audits
- board minutes
- current school policies and procedures
- grant applications program plans and needs assessments,
- grant awards
- payroll records
- purchase orders
- student records

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The scope of work performed also included:

- classroom visitations and interviews with instructional staff to verify implementation of Individualized Education Programs (IEPs)
- interviews of child study team members and speech-language specialists
- interview of the program administrator regarding the IDEA grant

### **Expenditures Reviewed**

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The grants reviewed included Title I, Title I SIA, Title II, Title III, Title III Immigrant, Digital Divide grant, ESSER, IDEA Basic and Preschool from July 1, 2020 through February 28, 2021. A sampling of purchase orders and/or salaries was taken from each program reviewed.

### **General Overview of Uses of Federal Funds**

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#### **Title I Projects**

The district serves grades PK-12 and operates Title I schoolwide programs in all Title I-funded schools.

During the 2020-2021 school year the district programmed and budgeted its Title I, Part A allocation for the following activities: 1) parent and family engagement; 2) instructional materials and supplies; 3) professional development activities; 4) extended day/year programs; and 5) social-emotional learning.

#### **Title I SIA Projects**

The Title I SIA funds are used for instructional and non-instructional supplies and materials to support online learning programs and technology due to the COVID-19 pandemic and the remote/hybrid learning models subsequently implemented in the Comprehensive Support and Improvement schools. In addition, Title I SIA funds are budgeted for instructional staff salaries and benefits to support extended day/year programs. These programs have not commenced as of April 6, 2021 (the date of the virtual SIA monitoring session) and are planned for later this school year and/or summer.

#### **Title II Projects**

The Title IIA funds are being used to provide professional development for teachers on math and language arts strategies and on teaching in a virtual setting. Funds are also being used to provide training on the Danielson system for both teachers and administrators.

#### **Title III Projects**

The school district uses federal funds to support professional development for educators.

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Additional funds were used for unallowable expenses. The district will have to reallocate the funds to meet federal requirements and allowable uses.

**Title III Immigrant Projects**

Currently, the district is using federal funds for unallowable expenses. The district will have to reallocate the funds to meet federal requirements and allowable uses.

**IDEA Grant**

The FY 2020 IDEA basic and preschool funds are being used to reduce district tuition costs for students receiving special educational services in other school districts and approved private schools for students with disabilities and for supplies and materials. Additionally, 15% of the total IDEA allocation goes toward providing Comprehensive Coordinated Early Intervening Services (CCEIS). The district uses CCEIS funds for a district wide reading coach and a behavior specialist to support general education teachers as well as struggling learners in the general education setting.

The review of IDEA grant yielded no findings.

**Detailed Findings and Recommendations**

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**Title I**

**Finding 1:**

The district did not upload its Educational Stability for Children in Foster Care policies and procedures, to include transportation procedures, to its FY 2021 ESEA Consolidated Subgrant Application. Per ESEA legislation, each district is required to provide to the New Jersey Department of Education (NJDOE) a current, Board approved copy of the written transportation procedures for children in foster care. These transportation policies and procedures must delineate how transportation to maintain children in foster care in their school of origin, when in their best interest, will be provided, arranged, and funded in a cost-effective manner for the duration of the children's time in foster care.

**Citation:**

ESEA §1112 (c)(5)(B) Local Educational Agency Plans – Assurances

**Required Action:**

When the district creates an amendment to its FY 2021 ESEA Consolidated Subgrant Application for budgetary revisions, the district must upload its Educational Stability for Children in Foster Care policies and procedures.

This information must include a copy of the current, Board approved, written transportation procedures for children in foster care.

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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 2:**

The district did provide documented evidence of its district-level parent and family engagement policy; however, the policy contained outdated information (i.e., the Improving America Schools Act, research-based instruction). Per ESEA legislation, the district must have a current, Board approved district-level parent and family engagement policy in place at the beginning of each school year. In addition, parents and families must be involved in the development of the written district-level parent and family engagement policy, as well as be informed of ways they can further participate in the academic performance and achievement of their children.

**Citation:**

ESEA §1116 (a)(2): Local Educational Agency Policy: Written Policy

**Required Action(s):**

The district must institute policies and procedures to ensure a Board approved district-level parent and family engagement policy is in place at the beginning of the FY 2022 school year. This policy must include all required elements as articulated in ESEA, as amended by the Every Student Succeeds Act (ESSA). In addition, the district, in conjunction with parents and families, must conduct a review of the district-level parent and family engagement policy on an annual basis.

The review shall include, but is not limited to:

- a. Reviewing the parent and family engagement requirements, as articulated in ESEA, in order to guide the district's and parents' assessment of the existing policy
- b. Updating the district policy where necessary
- c. Documenting the review of the revised policy by parents of Title I students, to include the comment period and final parent approval of the revised policy
- d. Approving and adopting the updated district-level parent and family engagement policy by the Board including the date of adoption on the revised district-level parent and family engagement policy
- e. On an annual basis, the district must ensure Title I parents are provided an opportunity to review and comment on the district-level parent and family engagement policy before Board action occurs

**Recommended Action(s):**

To further enhance knowledge regarding policies and procedures related to parent and family engagement, it is recommended that the district administrators and staff review the parent and family engagement resources available on the NJDOE website at [Title I, Part](#)

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[A Parent Family Engagement](#). For additional assistance, please contact the Office of Supplemental Educational Programs at [titleone@doe.nj.gov](mailto:titleone@doe.nj.gov).

**Finding 3:**

The district provided evidence of school-level parent and family engagement policies for several of the Title I funded schools. These policies, however, referenced outdated information (i.e., No Child Left Behind requirements).

The district did not provide evidence to show how parents and families were involved actively in the development of these school level policies as well as the methods by which the district widely distributed the policies to parents and families, in multiple languages and understandable formats.

Per ESEA legislation, parents and families must be involved in the development of the written school level parent and family engagement policy, as well as be informed of the ways in which they can further participate in the academic performance and achievement of their children.

**Citation:**

ESEA §1116(b)(1): School Parent and Family Engagement Policy

**Required Action(s):**

For the FY 2022 school year, the district must ensure that each Title I-funded school has a written school-level parent and family engagement policy that is Board approved.

These policies must be developed and reviewed with the active engagement of parents and families, as well as be widely distributed to parents and families on an annual basis.

In this way, parents and families are afforded opportunities to become effective partners in the district's ongoing parent involvement process.

**Finding 4:**

The district provided documented evidence of school-parent compacts for each of the eight served, Title I schools. Each compact, however, contained outdated information (i.e., New Jersey Core Curriculum Content Standards, No Child Left Behind requirements) and not all were Board approved. The district did not provide evidence that parents and families were involved actively in the development of these compacts or how the district widely distributed the compacts to parents and families. Per ESEA legislation, as a component of the school-level parent and family engagement policy, each Title I-funded school must develop, in collaboration with parents, a school-parent compact that outlines how parents, the entire school staff and students will share the responsibility for improved student academic achievement and the means by which the school and parents will build and develop a partnership to help children achieve the New Jersey Student Learning Standards (NJSLS). 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.

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**Citation:**

ESEA §1116(d)(1)(2): Parent and Family Engagement (Shared responsibilities for High Student Academic Achievement).

**Required Action(s):**

The district must update each of the 8 school-parent compacts to include current information pertaining to all ESEA legislative requirements. Each school-parent compact for FY 2021 must be Board approved and submitted with the district's Corrective Action Plan (CAP). In addition, the district must institute policies and procedures to ensure the following ESEA requirements are met:

- At the beginning of the FY 2022 school year, Board approved, school-parent compacts are in place for all Title I-served schools.
- All school-parent compacts must be developed, in collaboration with parents, to outline how parents, the entire school staff, and students will share the responsibility for improved student academic achievement and the means by which the school and parents will build and develop a partnership to help children achieve the New Jersey Student Learning Standards (NJSLS).
- The district must include parents and families in the ongoing monitoring and continued development and implementation of all elements of the written school-parent compacts.
- The school-parent compacts must be distributed widely to parents and families.

**Recommended Action(s):**

The district is encouraged to review all ESEA requirements as these relate to school-parent compacts. Information related to school-parent compacts may be found 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](mailto:titleone@doe.nj.gov).

**Finding 5:**

The district did not provide evidence of the issuance of the required Parents Right-to-Know letter. Per ESEA legislation, the purpose of the Parents Right-to-Know letter is to provide parents and families with information regarding the qualifications of staff within the Title I-funded schools. In addition, the Parents Right-to-Know letter is to be distributed to all parents and families and must meet the following requirements:

- 1) issued in English and other languages that represent the school community
- 2) issued in an understandable format
- 3) issued in a timely manner

**Citation:**

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

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**Required Action:**

With the submission of the Corrective Action Plan (CAP) the district must provide a copy of its Parents Right-to-Know letter, including a specified date of issuance, together with evidence of its distribution. The Parents Right-to-Know letter must meet the following requirements:

- 1) issued in English and other languages that represent the school community
- 2) issued in an understandable format
- 3) issued in a timely manner

**Finding 6:**

The district did provide documented evidence that it distributed its parent notification letter to parents of English learners on the district's language instruction program; however, several required ESEA requirements were missing from the letter, such as:

- How the program will meet the specific needs of the child in attaining English and meeting the New Jersey Student Learning Standards (NJSLS)
- The language instruction program's exit requirements
- The expected rate of transition into a classroom not tailored for English learners

Per ESSA legislation, districts using Title I or Title III funds to provide a language instruction educational program, as determined under Title III shall, not later than 30 days after the beginning of the school year, inform parents and families of an English learner identified for participation or participating in such program of specific requirements.

**Citation:**

ESEA §1112(e)(3): Parents Right to Know – Language Instruction

**Required Action(s):**

The district must revise its Parents Right-to-Know letter for Language Instruction to include the above listed information and re-distribute this letter to all parents and families of English learners. The district must submit documented evidence of the revised Parents Right-to-Know letter for Language Instruction, along with proof of its redistribution, with submission of its CAP.

**Finding 7:**

The district did not provide documented evidence that the development of each Annual School Plan (ASP) involved the participation of parents and families, outside community representatives, and one or more secondary students as stakeholders on the ASP planning team. Per ESEA legislation, all relevant stakeholders, including parents and families, outside community members, and secondary students for served high schools, must participate actively in the development, implementation, and evaluation of the district's ASP.



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**Citation:**

ESEA §1114(b)(2) Schoolwide Program Plan

**Required Action(s):**

Throughout the remainder of the FY 2021 ESEA project period, as district schools continue to implement and monitor each ASP, parents and families, outside community members, and one or more secondary students for the high school must be included as active participants in the ASP team meetings. In addition, the district must ensure programs and services articulated in each ASP are monitored regularly for effectiveness and that methods of evaluation are articulated in each ASP. The district must submit evidence with its CAP of the active participation of parents and families, outside community members, and one or more secondary students on the ASP planning teams (i.e., sign-in sheets or lists of attendees, meeting minutes).

**Recommended Action:**

It is recommended the district institute policies and procedures to ensure the active and ongoing involvement of parents and families, outside community representatives and one or more secondary students in the development, implementation and evaluation of the district's ASP. These groups bring a perspective to the ASP process that is critical to its ongoing success and, ultimately, improved academic achievement for all students. In addition, stakeholder engagement in the ASP process should happen throughout the entire school year, as much as possible, rather than occurring in a one or two month timeframe. By instituting such policies and procedures, the district will ensure the active and ongoing participation of these representative stakeholder groups in the district's ASP process as well as create opportunities for ongoing and regular stakeholder engagement throughout the entire school year.

**Finding 8:**

The district allocated \$386,000 for optional Title I Reserves, which included the following:

- 1) districtwide instructional programs (\$351,000)
- 2) additional transportation costs (\$35,000)

During the collaborative monitoring visit it was determined \$351,000 was allocated for the purchase of Chromebooks, which did not meet the definition of district wide instructional programs.

Additionally, it was determined \$35,000 was allocated for transportation for homeless students, which should have been allocated under the Homeless Services Reserves.

Neither amount, as allocated, was allowable under Title I, Part A.

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**Citations:**

ESEA §1112 Local Educational Agency Plans; 2 CFR §200.404 and §200.405 Cost Principles: Subpart E (Reasonable Costs and Allocable Costs)

**Required Action(s):**

In the amendment to the district's FY 2021 ESEA Consolidated Subgrant Application, the district must remove the allocated amounts for the two (2) above referenced Title I, Part A optional Title I Reserves (found on Eligibility Step 4) and re-budget the total amount of \$386,000 for other allowable Title I, Part A costs that are aligned to the district's identified needs and program plan.

**Recommended Action:**

It is recommended that both program and fiscal staff work collaboratively on future, ESEA Consolidated Subgrant Applications, especially regarding completion of the Title I, Part A sections of the application. In this work, both program and fiscal staff must ensure all allocated reserve amounts and budgeted costs are aligned to the district's identified needs and allowable uses as articulated under Title I, Part A.

**Finding 9:**

The district selected the following allowable use: "Equipment for the Title I program;" however, this allowable use was not aligned with identified needs. In addition, the funds budgeted for this allowable use did not meet the definition of instructional equipment (i.e., unit cost is greater than \$2,000). Rather, the associated budgeted costs of \$351,000 represented supplies and materials costs (i.e. Chromebooks). Per the Uniform Grant Guidance, 2 C.F.R. Part 200, equipment is any instrument, machine, furniture, apparatus or set of articles, which meets all the following criteria:

- It retains its original shape, appearance and character with use
- It does not lose its identity through fabrication or incorporation into a different or more complex unit or substance
- It is nonexpendable – that is, if the item is damaged or some of its parts are lost or worn out, it is more feasible to repair the item than to replace it with an entirely new unit
- Under normal conditions of use, including reasonable care and maintenance, it can be expected to serve its principal purpose for at least one year
- The item costs more than \$2000

An item should be budgeted as a supply (100-600 or 200-600) if it does not meet all the equipment criteria listed above. All instructional and non-instructional computer software and kits, regardless of cost, are considered to be supplies.

**Citation:**

ESEA §1112 Local Educational Agency Plans; 2 CFR §200.404 Cost Principles: Subpart E (Reasonable Costs and Allocable Costs)

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**Required Actions:**

In the amendment to the district's FY 2021 ESEA Consolidated Subgrant Application, the district must:

- delete "Equipment for the Title I program" under the Program Specific – Allowable Uses tab as an activity for which Title I, Part A funds will be budgeted
- under the 100 Instructional Expenditures tab, align the associated \$351,000 budgeted costs with the instructional materials and supplies allowable use

**Additional Recommended Action(s):**

The NJDOE recognizes and acknowledges that the COVID-19 pandemic presented the district with many unforeseen challenges during the 2019-2020 school year, which have continued during the 2020-2021 school year. Inevitably, these circumstances impacted the district's Title I, Part A program, including the comprehensive needs assessment (CNA) process and nonpublic equitable services provisions. The following recommendations are presented to assist the district in continuing to address and meet these challenges by further strengthening and enhancing its Title I, Part A programs and services:

**Comprehensive Needs Assessment:**

It is recommended the district include more specific information regarding grade levels, target populations, specific school performance targets, prior year outcomes, and the identification of data sources in the details for the comprehensive needs assessment in the district's ESEA Application, as well as those for each ASP. In this way, all comprehensive needs assessment information is in alignment, and shows a clearer connection to data driven decision-making and the importance of stakeholder engagement.

**Nonpublic:**

It is recommended the district continue to refine its policies and procedures regarding equitable services to nonpublic school students. Per ESEA legislation, in order for a district to allocate Title I, Part A funds for equitable services to nonpublic school students, a district must contact nonpublic schools both inside and outside the district's boundaries. This is done to identify the district's resident students in its Title I attendance areas who attend nonpublic schools that are located inside and outside the district's boundaries. Once resident students have been identified, the district must send consultation letters to these nonpublic schools to determine whether the nonpublic schools want to participate in the provision of equitable services. The district can review additional information regarding equitable services for nonpublic school students at [Nonpublic Equitable Services](#).

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**Title I SIA**

**Finding 1:**

The school did not show evidence of allocating Title I SIA and Title I SIA carryover funds completely and accurately in ASP budget for FY 2020-21. The allocated funds are not in alignment with the Title I SIA funds in the ESEA Consolidated application in the EWEG system. The district, in acknowledging their needs, hired a funding consultant prior to monitoring to assist in the development of proper budgeting and spending systems and these updates have already begun.

**Citations:**

ESEA §1111(d) 1(B): Comprehensive Support and Improvement, ESEA §1003(e): School Improvement

**Required Actions:**

The district shall revise the FY 20-21 ASP as well as the Title I SIA application of the ESEA Consolidated application to ensure accurate and aligned allocation of all Title I SIA and Title I SIA carry-over funds. These funds must support SMART Goal implementation of programs based on a comprehensive needs assessment informed by data and including evidence-based interventions. SIA budget detail in the Annual School Planning System (ASPS) must align with the SIA budget detail in the ESEA consolidated/Title I SIA application in EWEG.

The district shall develop, complete and implement the FY 21-22 ASP in the ASPS in accordance with requirements by the anticipated due date of June 30, 2021.

**Title II**

The review of Title II grant yielded no findings.

**Title III**

**Finding 1:**

The district is using federal funds to pay for translation services. This is not an allowable expense because comprehensible communication for parents is a state responsibility. Thus, the district is supplanting use of funds.

**Citation:**

ESEA §3115, 3115(g): Supplement not Supplant.

**Required Action:**

The district must reallocate the funds used to pay the Para-Plus vendor for translation services and provide the Title III state contact proof of reallocated funds by June 30, 2021.

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**Finding 2:**

The district's parent notification letter is not sent home in a language comprehensive to the parent/family.

**Citation:**

ESEA §1112(e): Parent Notification

**Required Action:**

The district must:

- Use the home language survey, enrollment intake or student information system to identify the preferred language for communication in the home
- Translate the district's parent notification letter in the identified languages (or use the state's translated templates for Parent ELL Placement, Parent ELL Continuation, or Parent ELL Exit letters. Source: [Title III ELL](https://www.state.nj.us/education/bilingual/) webpage: <https://www.state.nj.us/education/bilingual/>)
- Ensure the parent notification letter is sent home (via mail or electronically) in the identified language
- Retain a dated copy of the letter which was sent within 30 days of student identification for language services
- Provide Title III state contact:
- The languages in which communication will be provided to parents/families by June 30, 2020
- A copy of the translated parent notification letters by June 30, 2020

**Finding 3:**

The district did not provide evidence of academic progress monitoring for exited ELLs for two years and evidence of the progress made by exited ELs on content and achievement standards.

**Citation:**

ESEA §3121: Progress Monitoring

**Required Action:**

The district must:

- Implement academic progress monitoring procedures for at least two years for any student who is reclassified from ELL status
- Retain records and evidence of the student's progress in English-medium general education classes

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- Develop a process for identifying students who may need additional language assistance and/or may need to re-enter a language instructional education program
- Provide Title III state contact
- A copy of the developed progress monitoring form by June 30, 2021
- A copy of the developed procedures for monitoring and re-entry into program, if applicable, by June 30, 2021

**Recommendation:**

The district should evaluate current program tools used to support English language development for ELLs. Use disaggregated ACCESS domain scores and performance report indicators to determine which grade levels, language subgroup, or domain areas require improvement to meet state standards. Evaluate teacher instructional practices and provide support and professional development, particularly to general education teachers. Resource: <https://www.nj.gov/education/bilingual/resources/Danielson.pdf>.

**Title III Immigrant**

**Finding 1:**

The district is using federal funds to pay for translation services. This is not an allowable expense because comprehensible communication for parents is a state responsibility. Thus, the district is supplanting use of funds.

**Citation:**

ESEA §3115(g)

**Required Actions:**

The district must reallocate the funds used to pay the Para-Plus vendor for translation services. The district must also provide the Title III state contact proof of reallocated funds by May 31, 2021.

**Recommendation:**

The district should identify additional ways to engage parents of immigrant students to support their children's academic success in school. The district may use Title III Immigrant funds to:

- Increase parent's English fluency
- Identify parents who may teach Spanish as a Second Language to district educators

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**IDEA Program**

**Finding 1:**

The district did not consistently provide complete transition planning for students age 14 and above, and document decisions 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 and above and that decisions are documented in the IEP. 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 developed between July 2021 and December 2021
- 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.

**Finding 2:**

The district did not consistently document required participants were in attendance at identification, annual review, reevaluation planning, eligibility and IEP meetings for students referred and/or eligible for special education and related services. Specifically, the full child study team was not in attendance at identification meetings and a general education teacher was not in attendance at all other meetings.

**Citations:**

N.J.A.C. 6A:14-2.3(k)1(i-vii), 20 U.S.C. §1414(d)(1)(B) 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 IEP 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.

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A monitor from the NJDOE will conduct a site visit to:

- interview staff
- review meeting documentation, including sign-in sheets, for meetings conducted between July 2021 and December 2021
- review the oversight procedures

**Finding 3:**

The district did not consistently conduct reevaluations within three years of the previous classification date for students eligible 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. 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 July 2021 and December 2021
- review the oversight procedures

**Finding 4:**

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

**Citations:**

N.J.A.C. 6A:14-3.3(e), 3.4(j)

**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.

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.



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A monitor from the NJDOE will conduct a site visit to:

- interview staff
- review documentation from eligibility meetings held between July 2021 and December 2021
- review the oversight procedures

**Finding 5:**

The district did not conduct all assessments that were included in the evaluation plan developed at the identification meeting as part of an initial evaluation for students referred for special education and related services.

**Citations:**

N.J.A.C. 6A:14-2.3(a), 20 U.S.C. §1414(a)(1)(b) and 34 CFR §300.300

**Required Action:**

The district must ensure that when parental consent is obtained for an evaluation plan, all assessments included in the plan are completed. The district shall not make a unilateral decision to change the plan. 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, including assessment reports, from eligibility meetings held between July 2021 and December 2021
- review the oversight procedures

**Finding 6:**

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

**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. To demonstrate correction of noncompliance the district must conduct

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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 staff
- review documentation for students who were provided interventions in general education between July 2021 and December 2021
- review the oversight procedures

**Finding 7:**

The district did not consistently conduct all required sections of the functional assessment as a component of an initial evaluation for students referred for special education and related services.

**Citation:**

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

**Required Action:**

The district must ensure that all components of the functional assessment are conducted as part of the initial evaluation process. 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.

A monitor from the NJDOE will conduct a site visit to:

- interview staff
- review initial evaluation reports conducted between July 2021 and December 2021
- review the oversight procedures

**Finding 8:**

The district did not consistently provide copies of evaluation reports to parents at least 10 days prior to the determination of initial eligibility or continued eligibility for students referred and/or eligible for special education and related services.

**Citation:**

N.J.A.C. 6A:14-3.5(a)

**Required Action:**

The district must ensure parents are provided copies of evaluation reports not less than 10 days prior to the determination of eligibility. To demonstrate correction of noncompliance, the district must provide training for child study team members and

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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 demonstrating the provision of evaluation report(s) to the parents of students evaluated between July 2021 and December 2021
- review the oversight procedures

**Finding 9:**

The district did not consistently conduct required Child Find activities.

**Citation:**

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

**Required Action:**

The district must ensure written procedures are developed and implemented for students ages 3 through 21 who reside within the school district with respect to the location and referral of students who may have a disability due to physical, sensory, emotional, communication, cognitive, or social difficulties.

The district must ensure that the written procedures include highly mobile students with disabilities, such as students with disabilities who are migrant and/or homeless, and also include students who may have a disability even though they are advancing from grade to grade.

To demonstrate correction of noncompliance the district must provide 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 the procedures along with evidence of district-wide implementation
- review the oversight procedures

**Administrative:**

**Finding 1:**

The district has charged several expenditures to the incorrect general ledger accounts. For example, purchases of equipment totaling \$259,054 were charged to supplies.

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**Citation:**

Uniform Minimum Chart of Accounts for New Jersey Public Schools.

**Required Action:**

The district must follow the Uniform Minimum Chart of Accounts when charging expenditures in the general ledger.

**Finding 2:**

The district charged an expenditure of \$1,360 for a chess scholars program to the Title I SIA grant for the 2020-2021 fiscal year. The expense was incurred during the prior fiscal year (2019-2020) and accordingly is not allowable.

**Citation:**

Uniform Grant Guidance 2 C.F.R. 200.300

**Required Action:**

The expenditure should be reclassified and charged against local funds.

**Finding 3:**

The district failed to formally appoint all individuals, charged to the federal programs, by board resolution.

**Citation:**

Uniform Grant Guidance (UGG) 2 C.F.R. 200.302

**Required Action:**

All staff charged to federal grants should be reappointed annually by board resolution.

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).