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Winslow Township Public School District

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New Jersey K to 12 Education

Collaborative Monitoring Report
June 2021

District: Winslow Township Public School District
County: Camden
Dates Monitored: April 20, 22 and 23, 2021
Case #: CM-12-21

Funding Sources

Program	Funding Award
Title I, Part A	\$1,458,785
Title II	87,258
Title III	25,210
Title III Immigrant	5,758
Title IV	147,891
IDEA - Basic	1,457,298
IDEA – Preschool	82,311
Perkins V	57,948
ESSER	966,768
Total Funds	<u><u>\$ 4,290,227</u></u>

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Background

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

The NJDOE visited the Winslow Township 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 school'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 II, Title III, Title III immigrant, Title IV, Elementary & Secondary School Emergency Relief Fund (ESSER), IDEA Basic and Preschool for the period July 1, 2020 through March 31, 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

The grants reviewed included Title I, Title II, Title III, Title III Immigrant, Title IV, ESSER, IDEA Basic and Preschool from July 1, 2020 through March 31, 2021. A sampling of purchase orders and/or salaries was taken from each program reviewed.

General Overview of Uses of Federal Funds

Title I

The district operates schoolwide programs in all of its Title I funded schools. Primarily, the district provides supplemental instructional opportunities through extended year programs. The district also used Title I funds to support increased use of technology.

Title II Projects

The district used Title IIA funds primarily for teacher professional development in the areas of remote learning.

Title III Projects

The district uses Title III funds for professional development, materials, and supplies.

Title III Immigrant Projects

The district uses Title III Immigrant funds for parent and family workshops, and materials.

Title IV Projects

The district used Title IVA funds to support social emotional learning initiatives such as the middle school mentoring program.

IDEA Grant

The majority of the FY 2020 IDEA basic and preschool funds are being used to reduce district tuition costs for students receiving special educational services in approved private schools for students with disabilities. IDEA funds are also being used for supplies and materials to support

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students with disabilities in the classroom. The nonpublic funds are used to provide occupational therapy for students with disabilities.

There were no findings for the grant.

Perkins V

The district uses Perkins V funds for classroom supplies, professional development conferences, and equipment.

Detailed Findings and Recommendations

Title I

The review of Title I grant yielded no findings.

Title II

The review of Title II grant yielded no findings.

Title III

The review of Title III grant yielded no findings.

Title III Immigrant

The review of Title III Immigrant grant yielded no findings.

Title IV

Finding 1:

The district is implementing a middle school “mentoring” program that is not supported by the needs assessment and, as implemented, does not meet the goals of improving student academic achievement.

Citation:

ESSA § 4106(d)

Required Action:

Costs for this program are disallowed. The district is advised to consult with the district Title IX coordinator before implementing any gender-based programming, and to consider how such programs affect and include students who may be transgender, nonbinary or gender questioning.

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IDEA Program

Finding 1:

The district did not consistently document that the 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. A general education teacher was not consistently in attendance at 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.

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

- interview staff
- review meeting documentation, including sign-in sheets, for meetings conducted between August 2021 and February 2022
- review the oversight procedures

Finding 2:

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 the 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 August 2021 and February 2022

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- review the oversight procedures

Finding 3:

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). Specifically, IEPs did not consistently include:

- the specific supplementary aids and services considered
- the comparison of the benefits provided in the general education class and the benefits provided in the special education class
- the potentially beneficial or harmful effects which a placement in general education may have on the students with disabilities or other students in the class
- for those students placed in separate settings, activities to transition the student to a less restrictive environment

Citations:

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

Required Action:

The district must ensure that when determining the educational placement of a child with a disability, the IEP team considers the general education class first and that all required decisions regarding the placement are documented in the IEP, for each student removed from the general education setting, for more than twenty percent of the school day. The district must also ensure that for students placed in separate settings, the IEP team identifies activities to transition the student to a less restrictive environment and document them in each IEP. 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 whose IEPs that were identified as noncompliant. Names of the students whose IEPs were identified as noncompliant will be provided to the district by the special education monitor.

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

- interview staff
- review documentation from IEP meetings held between August 2021 and February 2022
- review the oversight procedures

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Perkins V

Finding 1:

Under local use of funds, the district did not provide sufficient evidence to show that the funds used (under this section) were used to develop, coordinate, implement, or improve career and technical education programs to meet the needs identified in the comprehensive needs assessment, described in section 134(c) Form B: Comprehensive Local Needs Assessment (CLNA).

The summary was completed as part of the approved FY21 Perkins grant application and the CLNA worksheets were submitted for review. There was no evidence, however, that an analysis was done so that needs or gaps could be identified in the CLNA. The Perkins budget must be clearly connected to the gaps identified in the worksheets.

Citation:

Perkins V Act §134(c)(d)(e)

Required Action:

The district must utilize the CLNA worksheets in the NJ Department of Education CLNA Guidance and Template to demonstrate that the district comprehensively reviewed the gaps and disparities within programs. This is required in order to identify the priorities for use of funding for approval of the FY22 Perkins funding application.

Finding 2:

The district did not provide adequate evidence to show that Perkins V funds were used to support Career and Technical Education (CTE) programs that are of sufficient size, scope and quality. A primary goal of CTE program is the progression of students, from the participant level to completion status, resulting in credential attainment and articulated credit.

Citation:

Perkins V §135(b)

Required Action:

The district must provide data on the attainment of postsecondary credit as part of the approved Child Development Program of study and must ensure CTE students attain postsecondary credit for this program. The district is required to contact NJDOE program officer in the Office of Career Readiness for technical assistance.

Finding 3:

The district did not provide sufficient evidence of sustained CTE professional development for all CTE administrators, teachers, and counselors related to the gaps and disparities identified in the CLNA. The professional development is limited in scope and not sustained. There is no evidence of the professional development being turn-keyed to other CTE staff and the focus should be on teachers receiving the professional development.

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Citation:

Perkins V Act §135(b)(2)

Required Action:

The district must submit a comprehensive professional development plan related to addressing the gaps and disparities for CTE staff and ensure annual implementation. The district is required to contact NJDOE program officer in the Office of Career Readiness for technical assistance.

Finding 4:

The district did not provide sufficient evidence to show that the CTE programs are meeting the State academic standards adopted by the State under section 1111(b)(1) of the Elementary and Secondary Education Act of 1965.

Citations:

N.J.A.C. 6A:19-3.1 Program requirements; Perkins V Act §135(b)(4)

Required Action:

The district must revise curriculum to reflect the correct New Jersey Student Learning Standard 9.3, CTE (citing specific Human Services and Marketing Standards within 9.3, respectively, not just the broad title). The district is required to contact the NJDOE Career Cluster leads in the Office of Career Readiness for technical assistance.

Finding 5:

The district was inconsistent with the implementation of requirements for work-based learning (WBL) for all students enrolled in approved CTE programs. There was no evidence of WBL student training plans. Also, there was no evidence of business agency agreements.

Citations:

N.J.A.C. 6A:8-3.2(f) Career education and counseling; N.J.A.C. 6A:19-4.1 Structured Learning Experiences

Required Action:

The district must ensure student training plans and business agency agreements are approved for students participating in WBL experiences. The designation of apprenticeships can only be given by the U.S. Department of Labor as referenced in the district's Child Development program of study. The district is required to contact NJDOE program officer and Work-Based Learning State Coordinator in the Office of Career Readiness for technical assistance.

Finding 6:

The district does not have Career and Technical Student Organizations (CTSOs) for any of their approved programs. As a result, the CTE programs are out of compliance.

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The afterschool clubs are not recognized as CTSOs. Therefore, Perkins funds cannot be used to support these extracurricular programs. There was no evidence of an affiliation agreement for all the associated CTSOs. Also, there was no evidence of payment for the CTSO programs.

Citations:

2 CFR 225 (A-87), Attachment A, Section C: General Principles for Determining Allowable Costs (Basic Guidelines); N.J.A.C 6A:19-3.1(a)

Required Action:

The district must establish official CTSO chapters with the state CTSO organizations for all approved programs. The district is required to contact NJDOE program officer in the Office of Career Readiness for technical assistance.

Finding 7:

FY 2020-2021 Perkins funds totaling \$2,580.44 were used to fund advisors for the TV Production Club, the Graphic Design Club and the Tech Club. However, these clubs are not recognized CTSO's. Consequently, Perkins funds cannot be used to support these extracurricular programs.

Citations:

UGG, 2 C.F.R. § 200.403, N.J.A.C 6A:19-1.2 and 6A:19-3.1(a)

Required Action:

Prior to the issuance of this report the district reappropriated these nonallowable expenditures and paid for the expenditures from other funding sources. Going forward, the district must ensure that students in approved CTE programs have the opportunity to participate in CTSO activities in official CTSO chapters. The district is required to contact their Perkins program officer for assistance in identifying the appropriate CTSO for its approved programs.

Finding 8:

The district did not provide evidence of consistent CTE program advisory committee meeting consultations. All documents and supplemental files in the CTE Advisory Board folder were reviewed. A minimum of two advisory committee meetings are required each year for approved CTE programs. The required evidence includes: an invitation, sign-in sheets, agenda, and meeting minutes.

The required advisory committee meeting must include a representative from:

- business/industry/labor member with expertise in the CTE program or program of study
- CTE teacher of the CTE program or program of study
- school counselor, postsecondary institution, district representative for special populations, parent(s) and student(s)

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Advisory boards must be composed of at least 30 percent of participants with industry experience specific to the program.

Citations:

N.J.A.C. 6A:19-3.1 Program requirements and NJ Perkins V State Plan

Required Actions:

The district must establish procedures for convening advisory committee meetings in compliance with NJDOE requirements and conduct meetings accordingly. The district is required to contact NJDOE program officer in the Office of Career Readiness for technical assistance.

Administrative

Finding 1:

On several occasions the district failed to issue a purchase order prior to goods being purchased or services being rendered. (confirming order). District policy and state regulations require that a properly executed purchase order be issued prior to the purchase of goods or the rendering of services.

Citations:

Uniform Grant Guidance 2 C.F.R. 200.302; N.J.S.A. 18A:18A(2)(v) Public School Contracts Law.

Required Action:

Applicable purchase orders must be issued to all vendors prior to purchasing goods or services.

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.