

State of New Jersey
Department of Education
PO Box 500
Trenton, NJ 08625-0500

Neptune City Public School District

210 West Sylvania Avenue
Neptune City, New Jersey 07753
Phone: (732) 775-5319



New Jersey K to 12 Education

Collaborative Monitoring Report
June 2021

District: Neptune City Public School District
County: Monmouth
Dates Monitored: April 27, 28 and 29, 2021
Case #: CM-13-21

Funding Sources

Program	Funding Award
Title I, Part A	\$ 153,292
Title II	23,966
Title IV	11,160
IDEA Basic	127,754
IDEA Preschool	5,741
Digital Divide	46,124
ESSER	121,502
Total Funds	<hr/> <hr/> <u>\$489,539</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 Neptune City 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 IV; Digital Divide grant; 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

The scope of work performed also included:

- classroom visitations and interviews with instructional staff to verify implementation of Individualized Education Programs (IEPs)

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- 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 I, Title II, Title IV, Digital Divide grant, 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 Projects

The district is using its fiscal year 2020-2021 Title I funds to implement a targeted assistance program in its school. Primarily, the district provides supplemental instructional opportunities through push-in and pull-out programs.

Title II Projects

Funds were budgeted for professional development but no funds have been spent to date.

Title IV Projects

Funds were budgeted for the Leader In Me program but no funds have been spent to date.

IDEA Grant

The FY 2020 IDEA basic and preschool funds are being used to reduce district tuition costs for students receiving special education services in approved private schools for students with disabilities.

The review of IDEA grant yielded no findings.

Detailed Findings and Recommendations

Title I

Finding 1:

The notification letters sent to the parents/guardians of identified Title I students did not include clearly defined entrance and exit criteria. The parents/guardians of identified Title I students must be informed of the multiple educationally related criteria used to identify their child/children for Title I services.

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Citation:

ESEA §1115: Targeted Assistance Schools; ESEA §1118(c): Parental Involvement (Policy Involvement)

Required Action:

The school's parent notification letters must include clearly defined entrance and exit criteria. The school must provide a copy of its revised parent notification letter for the upcoming 2020-2021 school year to the NJDOE for review along with the Corrective Action Plan (CAP).

Finding 2:

The district did not provide both district level and school-level Title I parent and family engagement policies for all six Title I schools.

Citations:

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

Required Action:

The district must have a written district/school parent and family engagement policy developed with parental input. This policy must be evaluated annually. The district must submit a copy of a recent board approved district/school parent and family engagement policy to the NJDOE for review along with the CAP.

Finding 3:

The district did not provide a policy for the Educational Stability for Children in Foster Care that addresses the following:

- How the LEA will promptly provide, arrange, and fund transportation for the duration of time a student is in foster care
- How the LEA will ensure that the processing of tuition reimbursement is conducted in such a way as to avoid any barriers to enrollment
- How the LEA will ensure immediate enrollment upon receipt of a school notification letter from the Department of Children and Families
- How the LEA will ensure immediate records transfers for children in foster care

Citation:

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

Required Action:

The district must develop a policy that ensures the educational stability for children in foster care to include all elements listed above. The district must submit copies of a

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recent board approved district educational stability policy to the NJDOE for review along with the CAP.

Title II

The review of Title II yielded no findings.

Title IV

The review of Title IV yielded no findings.

IDEA Program

Finding 1:

The district did not consistently convene identification and reevaluation planning meetings with required participants. Rather, identification and reevaluation planning meetings were regularly conducted by telephone between a parent and the case manager. In addition, the district did not consistently document that 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 or speech and language services. Specifically, a general education teacher was not 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 December 2021
- 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.

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Citation:

N.J.A.C. 6A: 14-3.8(a)

Required Actions:

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 August 2021 and December 2021
- 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 twenty 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 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.

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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. 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 December 2021
- review the oversight procedures

Finding 4:

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 citation listed above.

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

- interview staff
- review documentation from initial evaluations held between August 2021 and December 2021
- review the oversight procedures

Administrative

Finding 1:

The district is charging IDEA Basic and IDEA Preschool expenditures to the same program code (250) in the general ledger. Each of these programs should be assigned a separate program code in the school's general ledger.

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Citation:

Uniform Minimum Chart of Accounts for New Jersey Public Schools

Required Actions:

The school should assign separate program codes to Title III and Title III Immigrant. The codes should be in the 250-259 series.

Finding 2:

The district was not drawing down their federal funds on a regular basis.

Citation:

Uniform Grant Guidance 2 C.F.R. 200.305

Required Action:

The district must establish and maintain effective internal control over federal awards that ensure compliance with federal statutes and regulations. It is recommended that federal funds drawdowns be made on a monthly basis but never less than quarterly.

Finding 3:

A walk-through temperature scanner costing \$6,789 purchased with ESSER funds was incorrectly charged as supplies. Equipment with a cost in excess of \$2,000 should be charged to an equipment account in the general ledger.

Citation:

Uniform Minimum Chart of Accounts for New Jersey Public Schools.

Required Action:

The district must charge expenditures to the appropriate general ledger account in accordance with the Uniform Minimum Chart of Accounts for New Jersey Public Schools.

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.