



State of New Jersey

DEPARTMENT OF EDUCATION

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Commissioner

March 3, 2014

Dr. Timothy Purnell, Superintendent
Somerville Public Schools
25 West Cliff Street
Somerville, NJ 08876

Dear Dr. Dolan:

The New Jersey Department of Education has completed a review of funds received and disbursed from one or more federal programs by the **Somerville Board of Education**. The funding sources reviewed include titled programs for the Elementary and Secondary Education Act (ESEA) and the Individuals with Disabilities Education Act (IDEA). The review covered the period July 1, 2012 through October 31, 2013. The resulting report is enclosed. Please provide a copy of the report to each board member. All issued Consolidated Monitoring Reports will be posted on the department's website at <http://www.state.nj.us/education/finance/jobs/monitor/consolidated>.

Utilizing the process outlined in the attached "Procedures for LEA/Agency Response, Corrective Action Plan and Appeal Process," the Somerville Board of Education is required, pursuant to N.J.A.C. 6A:23A-5.6, to publicly review and discuss the findings in this report at a public board meeting no later than 30 days after receipt of the report. Within 30 days of the public meeting, the board must adopt a resolution certifying that the findings were discussed in a public meeting and approving a corrective action plan which addresses the issues raised in the undisputed findings and/or an appeal of any **monetary** findings in dispute (emphasis added). A copy of the resolution and the approved corrective action plan and/or appeal must be sent to this office within 10 days of adoption by the board. Direct your response to my attention.

Also, pursuant to N.J.A.C. 6A:23A-5.6(c), you must post the findings of the report and the board's corrective action plan on your district's website.

By copy of this report, your auditor is requested to comment on all areas of noncompliance and recommendations in the next certified audit submitted to the New Jersey Department of Education. If you have any questions, please contact Steven Hoffmann at (973) 621-2750.

Sincerely,

Robert J. Cicchino, Director
Office of Fiscal Accountability and Compliance

RJC/SH/dk:Somerville BOE Cover Letter/consolidated monitoring
Enclosures

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New Jersey K-12 Education

**CONSOLIDATED MONITORING REPORT
MARCH 2014**

District: Somerville Public Schools
County: Somerset
Dates On-Site: November 20, 21 and 22, 2013
Case #: CM-049-13

FUNDING SOURCES

Program	Funding Award
Title I	\$ 410,964
IDEA Basic	511,417
IDEA Preschool	16,165
Title IIA	81,971
Title III	18,534
Race To The Top	28,708
Total Funds	<hr/> <hr/> \$ 1,067,759

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BACKGROUND

The Elementary & Secondary Education Act (ESEA) 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 (ESEA, IDEA and Race to the Top). 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 purpose and achieving the overall objectives of the funding initiatives.

INTRODUCTION

The NJDOE visited the Somerville Public Schools to monitor the district's use of federal funds and the related program plans, where applicable, to determine whether the district's programs are meeting the intended purposes and objectives, as specified in the current year applications and authorizing statutes and to determine whether the funds were spent in accordance with the program requirements, federal and state laws, and applicable regulations. The on-site visit included staff interviews and documentation reviews related to the requirements of the following programs: Title I, Part A (Title I); Title II, Part A (Title II); Title III; IDEA Basic and Preschool; and Race to the Top for the period July 1, 2012 through October 31, 2013.

The scope of work performed included the review of documentation including grant applications, program plans and needs assessments, grant awards, annual audits, board minutes, payroll records, accounting records, purchase orders, a review of student records, classroom visitations and interviews with instructional staff to verify implementation of Individualized Education Programs (IEP), a review of student class and related service schedules, interviews of child study team members and speech-language specialists and an interview of the program administrator regarding the IDEA grant, as well as current district policies and procedures. The monitoring team members also conducted interviews with district personnel, reviewed the supporting documentation for a sample of expenditures and conducted internal control reviews.

EXPENDITURES REVIEWED

The grants reviewed included Title I, Title II, Title III; IDEA Basic and Preschool, and Race to the Top from July 1, 2012 through October 31, 2013. A sampling of purchase orders and/or salaries was taken from each program reviewed.

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GENERAL DISTRICT OVERVIEW OF USES OF TITLE I, IDEA AND RACE TO THE TOP FUNDS

Title I Projects

The district conducts Title I Targeted Assistance Programs at Van Derveer Elementary School and Somerville Middle School. The district used Title I funds for salaries and benefits of two Reading Specialists at Van Derveer Elementary School to provide Title I push-in and pullout services. At Somerville Middle School, the district used Title I funds to support a portion of a Mathematics teacher's salary and benefits to provide additional learning time during the day. The district also provides Title I extended day learning opportunities through before and after school programs, and used Title I funds to pay for supervision and teacher stipends for those Title I programs. In addition, the district plans to provide Title I professional development and to purchase instructional supplies, such as iPads and Chromebooks for Title I students use.

IDEA Projects

The majority of the FY 2012 IDEA Basic funds were used to reduce district tuition expenditures for students receiving special educational services in approved private schools for students with disabilities. The IDEA Preschool funds were used for the purchase of instructional supplies for students in the preschool special education program. The nonpublic proportionate share of the grant is being used for instructional supplies and equipment, as well as to provide supplemental instruction and related services through a vendor, Middlesex Regional Educational Services Commission (MRESC) for students with disabilities attending nonpublic schools.

Race to the Top

The district used Race to the Top funds for transition to the Common Core State Standards.

DETAILED FINDINGS AND RECOMMENDATIONS

Title I

Finding 1: The district did not provide evidence that the established entrance and exit criteria were consistently applied to determine Title I student eligibility. The monitors were unable to verify the process used to select and serve Title I students.

Citation: ESEA §1115: *Targeted Assistance Programs*.

Required Action: The district must establish a tracking mechanism for proper Title I student identification that is consistently applied. This mechanism must include documentation of which criteria were applied and how the student either met or did not meet the criteria.

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Finding 2: The district's Title I parental notification letters did not explicitly state the entrance and exit criteria used for Title I student identification, express the remediation actions and offer parents the option to opt-out of Title I services. Without the proper information, parents are unable to understand the reasons their child was selected to participate in the Title I program, and what is needed for their child to exit the program.

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

Required Actions: In the Title I participation letters, the district must include the multiple measures used to identify the students, as well as clearly defined exit criteria. The district must provide a copy of its revised FY 2013-2014 Title I participation letters to the NJDOE for review.

Finding 3: The district did not provide school-level Title I parental involvement policies. In addition, there is no evidence that both the district and school-level policies were annually reviewed and developed in conjunction with parents, as required by the legislation. The annual review and current board adoption allow parents and other stakeholders to impact the parental involvement process and identify the unique needs of the Title I schools and Title I parents.

Citation: ESEA §1118(a)(2): *Parental Involvement (Written Policy)*; ESEA §1118(b): *Parental Involvement (School Parental Involvement Policy)*.

Required Action: The district must have both a written district parental involvement policy and school-level parental involvement policies developed in conjunction with parent input and evaluated annually. The district should provide technical assistance to its schools in the development of school-level parental involvement policies and ensure that its schools work with their stakeholder groups to develop the policies and review it annually. Copies of a recent board approved district parental involvement policy and the newly approved school-level policies must be submitted to the NJDOE for review. The district must also submit evidence of engaging parents in the development and review of the policies (meeting agendas, sign in sheets, minutes), and evidence of the board's adoption of the district level policy (board meeting minutes).

Finding 4: The district did not provide evidence of convening its annual Title I parent meeting at the time of the visit, but planned to conduct a meeting in December 2013. Not conducting an annual meeting to explain the Title I legislation and the district's Title I programs does not allow parents of identified Title I students to be informed and vested in the Title I process.

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

Required Actions: The district must convene its FY 2013-2014 annual Title I meeting for the parents/guardians of its identified Title I students immediately and submit evidence to the NJDOE for review. Evidence of the annual meeting includes invitational

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letter/flyer, agenda, meeting minutes, and sign in sheets. In the future, the annual Title I parent meeting must be held in the beginning of the year no later than mid-October.

Finding 5: The Parents' Right-to-Know Highly Qualified Teacher (HQT) letter failed to inform all parents of their right to ask about the qualifications of their child's teachers.

Citation: ESEA §1111(h)(6): *State Plans: Reports (Parents' Right-to-Know)*.

Required Action: The Parents' Right-to-Know HQT letter must be revised and resent to the parents of all students who attend district Title I Schools. A template of the letter can be found at <http://www.state.nj.us/education/title1/hqs/rtk.htm>.

Finding 6: The district did not have supporting documents to verify the activity of Title I teachers as required by federal law. The time and activity sheets provided by the district did not meet statutory requirements. The documentation must reflect what the staff is doing, when and where they are working and it must match their funded percentage. This documentation is necessary to verify that funded staff is actually performing allowable grant activities.

Citation: OMB Circular A-87, Attachment B, Section 8(h): *Cost Principles for State, Local and Indian Tribal Governments (Compensation for personal services)*.

Required Action: The district must verify the time and activity of staff charged to the grant. The district must submit a list of FY 2013-2014 Title I funded staff, salaries, funding percentages and appropriate time sheets to date to the NJDOE for review.

Finding 7: The district's website contained information such as the description of the Title I program, parental involvement policies, school-parent compact and the Parents' Right-to-Know HQT letter that was inaccurate and/or outdated.

Citation: ESEA §1111(h)(2)(E): *Public Dissemination*.

Required Action: The district must review and update the website to reflect the current versions of the Title I program, parental involvement policies, school-parent compact and the revised Parents' Right-to-Know Highly Qualified Teacher letter.

Finding 8: On the ESEA-NCLB application in EWEG, the district incorrectly reported total nonpublic school enrollment counts instead of figures that reflect the total number of district students attending nonpublic schools. In addition, the district did not contact nonpublic schools both within and outside the district to accurately account for all district students attending nonpublic schools and for nonpublic low income counts. The inaccurate nonpublic enrollment and possibly the nonpublic low-income numbers in Step One of the Title I, Part A eligibility tab may prevent an equitable participation share for eligible nonpublic Title I students.

Citation: ESEA §1120: *Participation of Children Enrolled In Private School*.

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Required Action: The district must immediately contact nonpublic schools within a 50 mile radius of the district for enrollment and low income figures. In the future, the district must by no later than May of each year contact the nonpublic schools that enroll resident students to inform the schools of their opportunity to participate in the district's Title I program. After contacting nonpublic schools that enroll resident students, the district must then begin the consultation process with the nonpublic schools to identify eligible students and develop a service delivery plan. The district must revise its FY 2013-2014 ESEA-NCLB Consolidated Application to accurately reflect both the number of resident nonpublic school students and the number of low-income resident nonpublic school students. The district must send documentation of the consultation process (e.g., invitational letters, agendas, meeting notes, sign in sheets) to the NJDOE for review.

Title II

A review of the expenditures charged to the Title II grant yielded no findings.

Title III

A review of the expenditures charged to the Title III grant yielded no findings.

IDEA (Special Education)

Finding 9: The district did not consistently provide parents of students referred and/or eligible for speech-language services and students referred and/or eligible for special education and related services notice of a meeting for identification, initial eligibility/IEP, reevaluation planning and determination of continued eligibility/IEP team meetings.

Citation: N.J.A.C. 6A:14-2.3(k) 3,5; 20 U.S.C. §1414(b)(1); and 34 CFR §300.304(a).

Required Action: The district must ensure parents are provided notice of a meeting early enough to ensure the parent has an opportunity to attend. 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 an on-site visit to interview staff, review notices of meetings conducted between March 2014 and May 2014, and to review the oversight procedures.

Finding 10: The district did not consistently obtain written parental consent to conduct an initial evaluation for students referred for speech-language services.

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

Required Action: The district must ensure that informed parental consent is obtained prior to conducting initial evaluations. In order to demonstrate correction of noncompliance, the district must conduct training for speech-language specialists 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 an on-site visit to interview staff, review written parental consent to conduct an initial evaluation for students referred for speech-language services between March 2014 and May 2014, and to review the oversight procedures.

Finding 11: The district did not consistently provide copies of evaluation report(s) to parents at least 10 days prior to the determination of initial eligibility or determination of continued eligibility for students referred and/or eligible for special education and related services or speech-language services.

Citation: N.J.A.C. 6A:14-3.5(a); 20 U.S.C. §1414(b)(4); and 34 CFR §300.306(a).

Required Action: The district must ensure parents are provided copies of evaluation report(s) not less than 10 days prior to the determination of eligibility. 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 an on-site visit to interview staff, review documentation demonstrating provision of evaluation reports to parents prior to eligibility meetings held between March 2014 and May 2014, and to review the oversight procedures.

Finding 12: The district did not consistently convene meetings for the identification, initial eligibility/IEP, reevaluation and determination of continued eligibility meetings with required participants for students eligible for special education and related services for students eligible for speech-language services.

Citation: 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 meetings are conducted with required participants and that documentation of attendance and/or written parental consent to excuse a member of the team is obtained prior to the meeting and is maintained in student's records. In order to demonstrate correction of noncompliance, the district must conduct training for principals, 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 an on-site visit to interview staff, review the signed participation for meetings conducted between March 2014 and May 2014, and to review the oversight procedures.

Finding 13: The district did not consistently document the following in the IEPs of students removed from the general education setting for more than 20 percent of the day, including students placed in separate settings:

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- the supplementary aids and services considered, and an explanation of why they were rejected;
- a comparison of the benefits provided in the regular class and the benefits provided in the special education class; and
- for those students placed in separate settings, activities to transition the student to a less restrictive environment.

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

Required Action: The district must ensure when determining the educational placement of a child with a disability, the IEP team considers the general education class first and ensure 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. The district must also ensure for students placed in separate settings, the IEP team identifies activities to transition the student to a less restrictive environment and document them in each IEP. In order to demonstrate correction of noncompliance, the district must conduct training for child study team members and develop an oversight mechanism to ensure compliance with the requirements in the citation listed above. To demonstrate 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 an on-visit to interview staff, review the revised IEPs, review a random sample of additional IEPs developed at meetings conducted between March 2014 and May 2014, and to review the oversight procedures. The names of the students whose IEPs were identified as noncompliant will be provided to the district by the monitor.

Finding 14: The district did not consistently include required considerations and statements in each IEP for students eligible for special education and related services and speech-language services. Specifically, IEPs did not consistently document:

- statement of how the student's disability affects his or her involvement and progress in general curriculum;
- strengths of the student (in area of communication);
- results of initial or most recent evaluations;
- goals and objectives for students who are included in general education;
- supports for school personnel;
- transfer of rights/age of majority;
- participation in state and district wide assessments, including accommodations to be provided during testing; and
- approved accommodations and modifications.

Citation: N.J.A.C. 6A:14-3.7(c)1-11, (e) 1-17, and (f); 20 U.S.C. §1414(d)(3)(A)(B); and 34 CFR §300.324(a)(1)(2).

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Required Action: The district must ensure each IEP contains the required considerations and statements. 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. To demonstrate 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 an on-visit to interview staff, review the revised IEPs, review a random sample of additional IEPs developed at meetings conducted between March 2014 and May 2014, and to review the oversight procedures. The names of the students whose IEPs were identified as noncompliant will be provided to the district by the monitor. For assistance with correction of noncompliance, the district is referred to the state IEP sample form which is located at: www.state.nj.us/education/specialed/forms. The district must implement an oversight mechanism to regularly review IEPs for all required considerations and statements. A monitor from the NJDOE will conduct an on-site visit to review IEPs for students whose meetings were conducted between March 2014 and May 2014.

Finding 15: The district did not consistently provide to students eligible for speech-language services beginning at age 14, written invitations to meetings where post-school transition was being discussed.

Citation: N.J.A.C. 6A:14-2.3(k)2x and 3.7(e)13, 3.7(h); 20 U.S.C. §1414 (d)(1)(A)(i)(1)(VIII); and 34 CFR §300.322.b(2).

Required Action: The district must ensure each student with an IEP age 14 or above is provided with a written invitation to any IEP meeting where transition to adult life will be discussed. 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 an on-site visit to interview staff, review copies of invitations to IEP meetings to students age 14 and above for IEP meetings conducted between March 2014 and May 2014, and to review the oversight procedures.

Finding 16: The district did not conduct a meeting within 20 calendar days of receipt of a written request for evaluation for special education and related services or for speech-language services, to determine if an evaluation was warranted.

Citation: N.J.A.C. 6A:14-2.5(b)6; 3.3(e) and 3.6(b).

Required Action: The district must ensure a meeting is conducted within 20 calendar days of receipt of a written request for evaluation to determine if an evaluation is warranted. In order to demonstrate correction of noncompliance, the district must conduct training for child study team members and speech-language specialists 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 an on-site visit to interview staff, review initial evaluation time lines of meetings that were conducted between March 2014 and May 2014, and to review the oversight procedures.

Finding 17: The district did not consistently conduct multidisciplinary initial evaluations for students referred for speech-language services (speech-language specialist assessment and educational impact statement from the classroom teacher).

Citation: N.J.A.C. 6A:14-2.5(b) 6 and 3.6(b).

Required Action: The district must ensure a multidisciplinary evaluation is conducted for students referred for speech-language services by obtaining a statement from the general education teacher that details the educational impact of the speech problem on the student's progress in general education. In order to demonstrate correction of noncompliance, the district must conduct training for speech-language specialists and develop an oversight mechanism to ensure compliance with the requirements in the citation listed above. The district is referred to the sample report form for speech-language evaluations which is located at: www.state.nj.us/education/speced/forms. A monitor from the NJDOE will conduct an on-site visit to interview staff, review speech language evaluations for students whose meetings were conducted between March 2014 and May 2014, and to review the oversight procedures.

Finding 18: 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. Specifically, the district did not include:

- an observation of the student in other than a testing setting;
- review of prior interventions;
- review of developmental/educational history; and
- teacher interview.

Citation: N.J.A.C. 6A:14-3.4(f)4(i-vi); 20 U.S.C. §1414(b)(4) and (5); and 34 CFR §300.306(c)(i).

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 an on-site visit to interview staff, review evaluations of students whose initial meetings were conducted between March 2014 and May 2014, and to review the oversight procedures.

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Finding 19: The district did not ensure child study team participation at the planning conference of students transitioning from an Early Intervention program to preschool.

Citation: N.J.A.C. 6A:14-3.3(e)1; 20 U.S.C. §1414(d)(1)(D); and 34 CFR §300.321(f).

Required Action: The district must ensure a member of the child study team participates in the planning conferences for each student transitioning from Early Intervention to preschool. 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 an on-site visit to interview staff, review copies of Early Intervention attendance forms for meetings conducted between March 2014 and May 2014, and to review the oversight procedures.

Finding 20: The district does not have a policy for the provision of students with disabilities participating in district wide assessments.

Citation: 34 CFR §300.160.

Required Action: The district must revise its policies and procedures to ensure students with disabilities participate in district wide assessments. The policy must include the provision of accommodations and modifications and the provision of alternate assessments for those children who cannot participate in the regular assessment. If the district reports publicly on the district wide assessment, the district must also report with the same frequency and in the same detail as it reports on the assessment of non-disabled children. A monitor from the NJDOE will conduct an on-site visit to review this policy revision.

Race to the Top

A review of the expenditures charged to Race to the Top grant yielded no findings.

Administrative

Finding 21: The district failed to formally appoint all individuals charged to the federal programs by board resolution.

Citation: EDGAR, PART 80--*Uniform Administrative Requirements for Grants and Cooperative Agreements to State and Local Governments*, Section 20, Standards for financial management systems.

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

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Finding 22: The district does not fully comply with required timekeeping standards for federally funded grants. Employees with 100 percent of their salary paid with Title I funds must complete a semi-annual certification attesting to their performance of Title I related duties, and employees with less than 100 percent of their salary paid with Title I must complete monthly personal activity reports.

Citation: EDGAR, PART 80--*Uniform Administrative Requirements for Grants and Cooperative Agreements to State and Local Governments*, Section 20, Standards for financial management systems.

Required Action: The district must ensure employees submit detailed personal activity reports that have been verified by supervisors, as required.

Recommendation 1: The district does not have a purchasing manual that details procedures for the procurement of goods and services.

Citation: EDGAR, PART 80--*Uniform Administrative Requirements for Grants and Cooperative Agreements to State and Local Governments*, Section 20, Standards for financial management systems. N.J.A.C. 6A:23A-6.6 Standard operating procedures for business functions.

Recommended Action: The district should prepare and adopt a detailed purchasing manual to ensure compliance with current state and federal procurement regulations.

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 (973) 621-2750 or via email at steven.hoffmann@doe.state.nj.us.