



State of New Jersey
DEPARTMENT OF EDUCATION
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DAVID C. HESPE
Acting Commissioner

August 15, 2014

Dr. Jeanne Apryas, Superintendent
Sussex-Wantage Regional School District
27 Bank Street
Sussex, NJ 07461

Dear Dr. Apryas:

The New Jersey Department of Education has completed a review of funds received and disbursed from one or more federal programs by the **Sussex-Wantage Regional School District 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 May 31, 2014. 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 Sussex-Wantage Regional School District 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:Sussex-Wantage Reg. School District BOE Cover Letter/consolidated monitoring
Enclosures

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New Jersey K-12 Education

**CONSOLIDATED MONITORING REPORT
AUGUST 2014**

District: Sussex-Wantage Regional School District
County: Sussex
Dates On-Site: June 19 and 20, 2014
Case #: CM-052-13

FUNDING SOURCES

Program	Funding Award
Title I	\$ 202,752
IDEA Basic	415,241
IDEA Preschool	19,913
Title IIA	49,502
Title III	1,031
Race To The Top	12,192
Total Funds	<u>\$ 700,631</u>

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BACKGROUND

The Elementary and 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 Sussex-Wantage Regional School District to monitor the district's use of federal funds and the related program plans, where applicable, to determine whether the district's programs are meeting the intended purposes and objectives, as specified in the current year applications and authorizing statutes and to determine whether the funds were spent in accordance with the program requirements, federal and state laws, and applicable regulations. The on-site visit included staff interviews and documentation reviews related to the requirements of the following programs: Title I, Part A (Title I); Title II, Part A (Title II); Title III; IDEA Basic and Preschool; and Race to the Top for the period July 1, 2012 through May 31, 2014.

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 May 31, 2014. 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 served all three of its schools – Clifton E. Lawrence School, Wantage Elementary School and Sussex Middle School. The district implemented targeted assistance programs in all three schools focusing on the content areas of English language arts and mathematics. Title I funds have been expended to support salaries and benefits for basic skills instructors in Kindergarten through Grade 5. Funds were also used for teacher stipends for after school tutoring and a summer program plus instructional supplies.

IDEA Projects

IDEA funds were used to reduce district tuition costs for students receiving special educational services in other public school districts and approved private schools for students with disabilities, related service providers, outside consultants, and instructional supplies.

Race to the Top

The Race to the Top funds were used to support the district's transition to the common core state standards.

DETAILED FINDINGS AND RECOMMENDATIONS

Title I

Finding 1: The district did not have a parental involvement program that reflected the requirements of the Title I legislation. There was no evidence the district's FY 2013-2014 parental involvement policy on the webpage was reviewed and board adopted since August 2008 and that the school-level parental involvement policies were developed. Additionally there was no evidence the policy was developed in conjunction with parents. The annual review and current board adoption of the district parental involvement policy and the school-level parental involvement policies allow parents/guardians of Title I students to impact the parental involvement process and identify the unique needs of each Title I served school.

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

Required Action: The district must develop school-level parental involvement policies for each Title I school plus have the district parental involvement policy reviewed annually with current board adoption. Copies of recent board approved parental involvement policies must be submitted to the NJDOE for review. The inclusion of parents/guardians of Title I students must be documented with meeting agendas, sign in sheets and minutes.

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Finding 2: The district provided evidence of their FY 2013-2014 school-parent compacts; however, the same school-parent compact was used for all schools. Additionally, there was no evidence the school-parent compact was developed in conjunction with Title I parents. The absence of parent participation in developing this required document excluded parents from more active participation in their child's educational program.

Citation: ESEA §1118: *Parental Involvement*.

Required Action: The district must include the parents/guardians of Title I students in the development of the school-parent compact for each school served. The district must submit to the NJDOE for review documentation supporting the participation of Title I parents in the development of the FY 2014-2015 school-parent compact.

Finding 3: The district provided sign in sheets for Lawrence and Wantage Elementary Schools' annual Title I parent meeting; however, no evidence of convening the annual Title I parent meeting was provided for Sussex Middle School. The district did not provide evidence to verify the required information was delivered to the parents at these meetings as mandated by the legislation. Not conducting an annual meeting to explain the Title I legislation and the district's Title I program did not allow Title I parents/guardians to be informed and vested in the Title I process.

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

Required Action: The district must convene the FY 2014-2015 annual Title I meeting for the parents/guardians of Title I students in the beginning of the school year (no later than mid-October). Evidence of the meetings, which includes invitational letters/flyers, agendas, meeting minutes, and sign in sheets, must be submitted as evidence of said meeting to the NJDOE for review.

Finding 4: The Title I parental notification letters for Lawrence and Wantage Elementary Schools did not explicitly state the entrance and omitted exit criteria for the students in the Title I program. Additionally, data needs to be more comprehensive and have all criteria represented. The Sussex Middle School notification letter needs to spell out the entrance criteria which must be multiple measures "one or more" and finally, the exit criteria needs to be included. All parental notification letters did have the opt out option.

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

Required Action: The district must revise the Title I parental notification letters to include the specific entrance and exit criteria and remove the following language "not one or more" from the Sussex Middle School letter.

Finding 5: There was no evidence that the Parents' Right-to-Know Highly Qualified Teacher (HQT) was provided to parents. The Parents' Right-to-Know HQT letter informs all parents of

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their right to ask about the qualifications of their child's teachers and the definition of highly qualified staff.

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

Required Action: The Parents' Right-to-Know HQT letter must be issued to the parents of all students who attend Sussex Wantage Regional Schools annually at the beginning of the school year. The district must submit a copy of its dated FY 2014-2015 letter to the NJDOE for review. A template of the letter can be found at: <http://www.state.nj.us/education/title1/hqs/rtk.htm>.

Finding 6: The time sheets for Title I funded staff did not include a schedule/subject matter being delivered as evidence of Title I services delivered. The documentation must reflect what the staff is doing, when and the location to ensure 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 revise the time and activity information for staff to clearly reflect when services to identified Title I students are occurring. The district must submit a copy of the revised time and activity reports to the NJDOE for review.

Finding 7: The district did not provide documentation including, but not limited to, affirmation of consultation and refusal forms to verify that its consultation with nonpublic school officials was timely, ongoing, and meaningful. Title I regulations stipulate that consultation must continue throughout the implementation and assessment of services to ensure that Title I services align to the needs of the identified nonpublic students.

Citation: ESEA §1120 and §9501 and §200.63 of the Title I regulations.

Required Action: In order to ensure timely, ongoing, and meaningful nonpublic school consultation, the district must institute steps to enhance its record keeping of ongoing contact with nonpublic school officials. The district must submit to the NJDOE all documentation to verify that consultation was timely, ongoing and meaningful, covered all appropriate topics, and resulted in program designs that had a reasonable expectation of success. The district should review the NJDOE and/or USDE guidance on the provision of equitable services to eligible nonpublic schoolchildren to ensure all requirements and maintenance of records are satisfied. Additionally, the district can review NJDOE Nonpublic School Documentation, which is available at: <http://www.nj.gov/education/grants/entitlement/nclb/>.

Finding 8: The district did not maintain control of Title I funds generated to provide services to nonpublic school students. Evidence found that two nonpublic employees being paid to deliver Title I equitable services to resident nonpublic school students were not under contract with the

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district or paid employees of the district. The employees were being paid by the nonpublic school with the district reimbursing the nonpublic school for services rendered by the two employees.

Citation: ESEA §1120(b): Participation of Children Enrolled in Private Schools (Public Control of Funds); 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 enter into an employment agreement with the individuals or enter into a contract signed by both parties. Language in the contract needs to be explicit with the breakdown of services to be delivered to include the time (after or before school) plus language stipulating that payment is based on services rendered as verified by student sign in sheets. The district must provide the NJDOE evidence of the employees' time and activity report signed by a district employee or the signed contract with the third-party provider selected to provide equitable service to nonpublic school students.

Title II

Finding 9: The FY 2012-2013 grant year review of Title II expenditures revealed that costs for educational consultant services for professional development were charged to state and local funds. In FY 2013-2014, the district misclassified these educational consultant service expenditures, and the costs were charged to the Title II program.

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

Required Action: The district must reverse these expenditures, and charge them to state/local funding. The district must provide evidence of the journal entry to reverse the expenditures to the NJDOE for review.

Finding 10: Review of FY 2012-2013 and FY 2013-2014 Title II program expenditures revealed non-allowable costs were charged to the program. Specifically, these costs included iPads, cases and carts, printers, supplies, and scholastic books. Expenses for classroom materials and supplies that are for student use are non-allowable under Title II-A. Materials related to supplemental, professional development activities are allowable expenditures.

Citation: Title II, Part A, Non Regulatory Guidance, Section F.

Required Action: The district must reverse the current year expenditures and charge them to state/local funding. The district must provide evidence of the journal entry to reverse the expenditures to the NJDOE for review.

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Finding 11: The sampling of instructional staff found that four teachers did not meet requirements for classification as a highly qualified teacher. To meet the legislative definition of “highly qualified,” the teacher would have to possess the content certification for the core academic subject he/she currently teaches.

Citation: ESEA §1119: *Qualifications for Teachers and Paraprofessionals.*

Required Action: For the 2014-2015 school year, the district must ensure these teachers are assigned to instructional positions for which they meet the highly qualified designation. The district must provide the NJDOE with the teachers’ proposed schedules for the 2014-2015 school year.

Finding 12: The district is charging Title II expenditures to the incorrect program code in the general ledger. Expenditures are being charged to program code 290 when a program code between 270 and 279 should be used.

Citation: Uniform Minimum Chart of Accounts for New Jersey Public Schools.

Required Action: The district must establish accounts using the appropriate program codes in the general ledger.

Title III

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

IDEA (Special Education)

Finding 13: In the 2013-2014 grant year, the district did not consistently enter into contracts with all independent consultants and agencies that provided services directly to students. In addition, when contracts were developed, they did not include a not to exceed amount.

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 enter into a contract with all agencies or consultants where services are being provided to students. Contracts must include a per-service or hourly rate and a not to exceed amount. In addition, the contracts must be approved by board resolution.

IDEA Program

Finding 14: The district did not consistently provide parents of students referred and/or eligible for special education and related services and speech-language services notice of a meeting for identification, eligibility, reevaluation planning and IEP team meetings.

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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 provide parents notice of a meeting in writing early enough to ensure they have 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 documentation of the provision of notice of a meeting for meetings conducted between January 2015 and March 2015, and to review the oversight procedures.

Finding 15: The district did not consistently conduct identification meetings within 20 calendar days of receipt of a written request for evaluation for students eligible 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 identification meetings are conducted within 20 calendar days of receipt of a written request for evaluation. 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 documentation from meetings conducted between January 2015 and March 2015, and to review the oversight procedures.

Finding 16: The district did not consistently conduct all required sections of the functional assessment as a component of initial evaluations for students referred for special education and related services and for students referred for speech-language services.

Citation: N.J.A.C.6A:14-3.4(f)4(i-vi); 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 citations 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. Monitors from the NJDOE will conduct an on-site visit to interview staff, review initial evaluation reports for students evaluated between January 2015 and March 2015, and to review the oversight procedures.

Finding 17: The district did not consistently conduct multidisciplinary initial evaluations for students referred for speech-language services by obtaining an educational impact statement from the classroom teacher.

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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 written 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. A monitor from the NJDOE will conduct an on-site visit to interview staff, review initial evaluation reports for students referred for speech-language services between January 2015 and March 2015, and to review the oversight procedures

Finding 18: The district did not consistently provide to students beginning at age 14, written invitations to meetings where post-school transition would be discussed. In addition, the IEPs for students ages 14 and above did not include required transition components. Specifically, IEPs did not contain:

- statement of students strengths;
- course of study and related strategies and/or activities that are consistent with the students strengths, interests, preferences and are intended to assist the student in developing postsecondary goals;
- description of the need for consultation from other agencies that provide services for individuals with disabilities; and
- a statement of any needed interagency linkages and responsibilities.

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, and that IEPs contain required transition components. In order to demonstrate correction of noncompliance, the district must conduct training for child study team members and develop an oversight mechanism to ensure compliance with the requirements in the citation listed above. To demonstrate that the district has corrected the individual instances of noncompliance, the district must conduct annual review meetings and revise IEPs for specific students whose IEPs were identified as noncompliant. A monitor from the NJDOE will conduct an on-site visit to interview staff, review the revised IEPs, a random selection of additional IEPs, copies of invitations to IEP meetings to students age 14 and above for meetings conducted between January 2015 and March 2015, and to review the oversight procedures.

Finding 19: The district did not consistently document all required considerations and statements in the IEPs of students eligible for special education and related service and for students eligible for speech-language services.

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IEPs for students eligible for special education and related services did not include:

- statement of transition from Elementary to Secondary;
- statement of how progress towards annual goal(s) will be measured;
- for students 14 and older, documentation of the student's strengths, interests and preferences; and
- consideration of Extended School Year (ESY) and an explanation of the program when it will be provided to students placed in out-of-district settings.

IEPs for students eligible for speech-language services did not include:

- participation in state and district wide assessments, including accommodations to be provided during testing; and
- consideration of ESY and an explanation of the program when it will be provided.

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

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 citations listed above. To demonstrate that the district has corrected the individual instances of noncompliance, the district must conduct annual review meetings and revise IEPs for specific students whose IEPs were identified as noncompliant. A monitor from the NJDOE will conduct an on-site visit to interview staff, review the revised IEPs, along with a sample of IEPs for students whose annual review meetings were conducted between January 2015 and March 2015, and review the oversight procedures. For assistance with correction of noncompliance, the district is referred to the state IEP sample forms which are located at: www.statenj.us/education/specialed/forms. The names of the students whose IEPs were identified as noncompliant will be provided to the district by the monitor.

Finding 20: The district did not consistently convene meetings with required participants for students referred and/or eligible for special education and related services and for students referred and/or eligible for speech-language services.

Citation: N.J.A.C 6A:14-2.3(k)1(i-vii), 2(i-x); 3.3(e); 20 U.S.C. §1414(d)(1)(B); and 34 CFR §300.321(a).

Required Action: The district must ensure all meetings are conducted with required participants and documentation of participation is maintained in students' records. 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

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monitor from the NJDOE will conduct an on-site visit to interview staff, review meeting documentation, including the sign in sheets, for meetings conducted between January 2015 and March 2015, and to review the oversight procedures.

Finding 21: 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. Specifically, IEPs did not consistently include:

- the supplementary aids and services considered;
- an explanation of why the supplementary aids and services were rejected;
- 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; and
- for students in a separate setting, activities to move 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 all required decisions regarding the placement are documented in the IEP for each student removed from general education for more than 20 percent of the school day. In order to demonstrate correction of noncompliance, the district must conduct training for child study team members regarding the district's procedures and develop an oversight mechanism to ensure compliance with the requirements in the citations 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-site visit to interview staff, review the revised IEPs, a random sample of additional IEPs developed at meetings conducted between January 2015 and March 2015, 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 22: The district did not consistently conduct annual review meetings within required time lines for students eligible for special education and related services.

Citation: N.J.A.C. 6A:14-3.7(i); 20 U.S.C. §1414(d); and 34 CFR §300.324(b)(1).

Required Action: The district must ensure IEP team meetings are conducted annually or more often if necessary to review, revise and determine the programs and placement of each classified student. 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 IEPs of students whose annual review meetings were conducted between January 2015 and March 2015, and to review the oversight procedures.

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Finding 23: The district did not obtain parental consent to evaluate prior to conducting initial evaluations of students referred for speech-language services.

Citation: N.J.A.C. 6A:14-3.4 (a)3(b).

Required Action: The district must ensure informed parental consent is obtained and maintained in student files. In order to demonstrate correction of noncompliance, the district must conduct training for speech-language specialists and develop an oversight mechanism to ensure compliance with the requirements in the citations listed above. A monitor from the NJDOE will conduct an on-site visit to interview staff, review documentation of written parental consent for students evaluated for speech-language services between January 2015 and March 2015, and to review the oversight procedures.

Finding 24: The district did not consistently provide parents with written notice that contains all required components for students eligible for speech-language services.

Citation: 20 U.S.C. §1414(b)(1)(c)(4)(A); 34 CFR §300.304(a)(4); and 34 CFR §300.305(a) and N.J.A.C. 6A:14-2.3(f) and 2.3(g).

Required Action: The district must ensure parents are provided written notice following a meeting that contains all required components within 15 calendar days of the meeting.. In order to demonstrate correction of noncompliance, the district must conduct training for speech-language specialists and develop an oversight mechanism to ensure compliance with the requirements in the citations listed above. A monitor from the NJDOE will conduct an on-site visit to interview staff, review copies of written notice provided to parents following meetings conducted between January 2015 and March 2015, and to review the oversight procedures.

Race to the Top

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

Administrative

Finding 25: 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.

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.S.A. 18A:18A(2)(v) *Public School Contracts Law*.

Required Action: Purchase orders should be issued to all vendors prior to goods or services being provided.

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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.