



State of New Jersey

DEPARTMENT OF EDUCATION

PO Box 500

TRENTON, NJ 08625-0500

CHRIS CHRISTIE
Governor

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Lt. Governor

DAVID C. HESPE
Commissioner

December 9, 2015

Dr. Leonard Fitts, Interim Superintendent
Pleasantville Public Schools
801 Mill Road
Pleasantville, Nj 08232

Dear Dr. Fitts:

The New Jersey Department of Education has completed a review of funds received and disbursed from one or more federal programs by the **Pleasantville 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, 2013 through March 25, 2015. 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 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 Pleasantville 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 Carla Spates at (609) 984-5968.

Sincerely,

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

RJC/CS/dk:Pleasantville BOE Cover Letter /consolidated monitoring
Enclosures

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PLEASANTVILLE PUBLIC SCHOOLS
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New Jersey K-12 Education

**CONSOLIDATED MONITORING REPORT
DECEMBER 2015**

District: Pleasantville Public Schools
County: Atlantic
Dates On-Site: March 25 and 26, 2015
Case #: CM-002-14

FUNDING SOURCES

Program	Funding Award
Title I, Part A	\$ 1,333,496
Title II, Part A	213,153
Title III, Part A	174,723
Title III Immigrant	49,925
IDEA Preschool	25,883
IDEA Basic	1,075,689
Race to the Top	106,421
Carl D. Perkins	31,929
Total Funds	<u>\$ 3,011,219</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, Race to the Top, and Carl D. Perkins). 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 Pleasantville 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, Part A; Title III (Immigrant); Race to the Top; Carl D. Perkins (Perkins); and IDEA Basic and Preschool for the period July 1, 2013 through March 25, 2015.

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 school personnel, reviewed the supporting documentation for a sample of expenditures and conducted internal control reviews.

EXPENDITURES REVIEWED

The grants that were reviewed included Title I, Title II, Title III, Title III Immigrant, Race to the Top, Perkins, and IDEA Basic and Preschool from July 1, 2013 through March 25, 2015. A sampling of purchase orders and/or salaries was taken from each program reviewed.

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GENERAL OVERVIEW OF USES OF TITLE I, TITLE II, TITLE III, IDEA, CARL D. PERKINS AND RACE TO THE TOP FUNDS

Title I Projects

The district operates schoolwide programs in all of its Title I funded schools. Primarily, the district provides supplemental instructional opportunities through in-class support (response to intervention), extended day and extended year programs.

Title II Projects

The district had only spent approximately 15 percent of its FY 2014-2015 Title II funding at the time of the monitoring visit. Funds have been dedicated for professional development, with a concentration on literacy, integration of technology into the curriculum and PARCC preparation. The district had also spent approximately \$22,000 for professional development for Teachscape-the district's teacher evaluation program.

Title III Projects

The district has approximately 750 English Language Learners (ELLs) in bilingual education and English as a Second Language (ESL) programs. Grant funds are used to fund a bilingual paraprofessional's salary, professional development, curriculum upgrades, extended day/year programs, software, and family programs. Title III Immigrant funds are used to pay for a newcomer liaison, professional development, extended day/year programs, and software.

IDEA Projects (Special Education)

The FY 2014-2015 IDEA funds were used to reduce district tuition expenditures for students receiving special educational services in private schools for students with disabilities.

Carl D. Perkins

The district is a comprehensive community public school district that serves students in kindergarten through 12th grade from the city of Pleasantville in Atlantic County. The district is currently approved to operate the following Career and Technical Education (CTE) programs/program of study: Radio & Television - CIP Code – 09.0701; and Management Information Systems, General – CIP Code – 52.1201.

Race to the Top

The district used the Race to the Top funds for their principal evaluation program, and professional development in Understanding by Design. At the time of the monitoring visit there was \$60,000 in unexpended funds remaining.

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DETAILED FINDINGS AND RECOMMENDATIONS

Title I

Finding 1: The district could not provide evidence that the middle school and high school convened an annual Title I parent meeting. In a Title I schoolwide program, all parents/guardians are entitled to be informed about the school's Title I program, legislative requirements, and how they can be actively engaged in helping their child/children succeed academically.

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

Required Action: For the 2015-2016 school year, the district must ensure that its Title I schools convene an annual Title I meeting, at the beginning of the school year, to inform all parents of the legislative requirements, and the school's Title I program. The district must submit documentation of the meetings (e.g., invitational letter/flyer, agenda, meeting minutes, and sign in sheets) to the NJDOE for review.

Finding 2: There are teachers in the Middle School of Pleasantville (middle school) who did not meet the Highly Qualified Teacher (HQT) requirements and as such, the school should have distributed the Parents' Right-to-Know HQT follow-up letter by November 1, 2014. The school is required to send this letter to the parents of any child who is taught for four or more consecutive weeks by a teacher who has not met the HQT requirements.

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

Required Action: The school must develop the HQT follow-up letter and send a copy to the NJDOE for review. A template of the HQT follow-up letter can be found at: <http://www.state.nj.us/education/title1/hqs/rtk.htm>. Upon review by the NJDOE, the school must issue the HQT follow-up letter to the parents of any child taught by unqualified staff for four or more consecutive weeks.

Title II

Finding 3: Although the district has a completed district-based professional development plan, there was no evidence of school-based professional development plans. All school districts in New Jersey are required to create an annual district-level professional development plan and all schools are required to create school-level professional development plans. Activities in the school-level plans must be consistent with the district professional development plan. The district-level and school-level plans must align with New Jersey's definition of Professional Development and Professional Development Standards for Teachers and the New Jersey Standards for Professional Learning.

Citation: ESEA § 2122 & 6A:10-3.2.

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Required Action: The district and the schools must create a professional development plan that is consistent with professional development funded activities. The district must submit the professional development plan to the NJDOE for review.

Finding 4: The district used a portion of its Title II funds to pay for professional development related to its teacher evaluation system. As teacher evaluation systems are mandated by the State of New Jersey, federal funds cannot be used for this activity. This expenditure supplanted state/local funds.

Citation: ESEA §2123 (b): *Supplement not Supplant.*

Required Action: The district must amend its FY 2014-2015 Title II application, use state/local funds to support this program and repurpose the Title II funds dedicated for teacher evaluation for program(s) that are consistent with approved Title II activities. The district must send documentation of the adjusting journal entry to the NJDOE for review.

Finding 5: The middle school has a departmentalized grade 6 through 8 configuration. A review of special education teachers' personnel folders determined that not all special education teachers that provide primary instruction in a self-contained environment were highly qualified. Each possessed only a K-5 or K-8 certification along with a special education certification. In addition, the New Jersey HQT Identification Forms were not completed and available.

Citation: ESEA §1119 – *Qualifications for Teachers and Paraprofessionals*;
ESEA§1111(h)(6)(B)(ii) – Right to Know letter.

Required Action: The district must identify all teachers in the middle school who are not highly qualified. Unless a middle school teacher, providing direct instruction in a self-contained classroom in a departmentalized middle school is highly qualified, this teacher can no longer provide primary instruction to special education students. The district must also develop the HQT follow-up letter and send a copy to the NJDOE for review. A template of the HQT follow-up letter can be found at: <http://www.state.nj.us/education/title1/hqs/rtk.htm>. Upon review by the NJDOE, the school must issue the HQT follow-up letter to the parents of any child taught by unqualified staff for four or more consecutive weeks. Additionally, the district must develop and implement internal controls to ensure that its personnel records contained documentation of each teachers' file contain a completed copy of the New Jersey HQT Identification Form.

Title III

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

IDEA (Special Education)

Finding 6: The district did not consistently convene meetings for initial identification, initial eligibility/IEP, reevaluation and determination of continued eligibility meetings with a general

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education teacher in attendance for students eligible for special education and related services in the preschool disabled program.

Citation: N.J.A.C. 6A:14-2.3(k); 20 U.S.C. §1414(b)(4); and 34 CFR §300.321(a).

Required Action: The district must ensure that meetings are conducted with required participants and that documentation of attendance is maintained in student's records. 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 citations listed above. A monitor from the NJDOE will conduct an on-site visit to interview staff, review documentation, including sign in sheets, for meetings conducted between November 2015 and January 2016, and to review the oversight procedures.

Finding 7: The district did not document all required considerations and statements in each IEP. IEPs for students eligible for special education and related services did not include age 14 post-school transition components.

Citation: N.J.A.C. 6A:14-3.7(e) 11, 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 develop an oversight mechanism to ensure compliance with the requirements in the citations listed above. In addition, to demonstrate correction of individual instances of noncompliance, the district must conduct annual review meetings and revise IEPs for the 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 and a random sample of additional IEPs developed at meetings conducted between November 2015 and January 2016, 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.statenj.us/education/specialed/forms.

Finding 8: 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 (general education) may have on the student with disabilities or the other students in the class; and

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- 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); N.J.A.C. 6A:14-4.2 (a)4

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 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 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 the specific students that 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 random sample of additional IEPs developed at meetings conducted between November 2015 and January 2016, 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 9: The district did not consistently complete all required components of the evaluation process for students referred for special education and related services and for students referred for speech-language services. In addition, 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.

Citation: N.J.A.C. 6A:14-2.5(b)6 and 3.6(b); N.J.A.C. 6A:14-3.4(f)4(i-vi); 20 U.S.C. §1414(b)(1-3); 1412(a)(6)(b); and 34 CFR §300.304(b)(1).

Required Action: The district must ensure all components of a functional assessment are conducted as part of the initial evaluation process. In addition, the district must ensure that 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 child study team members and 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 initial evaluation reports for students referred for special education and related services or speech-language services between November 2015 and January 2016, and to review the oversight procedures.

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Carl D. Perkins

Finding 10: The district did not have advisory boards established and operating for each of their approved CTE programs.

Citation: Carl D. Perkins §134(b)(5) and N.J.A.C. 6A:19-3.1.

Required Action: The district must provide evidence that advisory boards are established for each of its CTE programs/programs of study. At a minimum, the two most recent dates the advisory boards conducted formal meetings must be identified, as well as a copy of the minutes for those meetings.

Finding 11: The district failed to provide adequate documentation related to professional development for CTE faculty.

Citation: Carl D. Perkins §134(b)4 and §135(b).

Required Action: The district must create a professional development plan for CTE teachers that is both classroom and industry focused to improve CTE instruction.

Finding12: The district failed to provide evidence of a record retention policy.

Citation: GEPA §437, EDGAR 80.42.

Required Action: The district must immediately develop a retention policy for records which document the compliance with program requirements, relate to fiscal control, and/or the accounting of project funds.

Finding 13: The district failed to provide evidence of policies and/or procedures related to the prevention of loss, damage, or theft of instructional equipment purchased with federal funds.

Citation: OMB Circular A-87; EDGAR 80.32.

Required Action: The district must immediately develop a control system that ensures the security of instructional equipment.

Finding 14: Perkins grant funds totaling \$1,350.00 were used to pay extra compensation to one employee for compiling student data from June 12, 2013 through June 16, 2013. Although no benefit was derived from the work performed by this employee during the FY 2013-2014 Perkins project period, the associated costs were reported on the district's FY 2013-2014 Final Report. This expenditure was allocable in its entirety to the prior project period, rather than to the FY 2013-2014 project period.

Citation: 2 CFR 225 (OMB Circular A087), Appendix A, Section C: *General Principles for Determining Allowable Costs (Basic Guidelines)*.

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Required Action: The district must refund the disallowed costs identified above. Additionally, the district must implement procedures to ensure that program costs are charged to the appropriate project period.

Finding 15: The district failed to comply with implementing regulations and program specific requirements contained in the Perkins Guidelines during FY 2013-2014, as follows:

- Equipment purchased was not received, installed and available for student instruction by June 30, 2014, the end of the project period. (Guidelines, Section D);
- Purchased equipment which was not itemized in the approved application or in an amendment to the approved application. (Guidelines, Section D);
- Funds transferred from an approved line item category to an unapproved line item category without filing an amendment application. (Guidelines, Section E);
- Purchase orders did not contain approved CIP code. (Guidelines, Section E); and
- Final Report submitted after the deadline, November 15, 2014. (Guidelines, Section E).

Sub-grantees are required to comply with the state plan and applicable statutes, regulations, and approved applications, and to use federal funds in accordance with those statutes, regulations, plan and applications.

Citation: 34 CFR § 76.700: *Compliance with statutes, regulations, State plan, and applications.*

Required Action: The district must implement procedures to ensure personnel assigned to administer the Perkins grant comply with the program specific requirements applicable to each project period.

Race to the Top

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

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 Carla Spates via phone at (609) 984-5968 or via email at carla.spates@doe.state.nj.us .

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