



State of New Jersey
DEPARTMENT OF EDUCATION
PO Box 500
TRENTON, NJ 08625-0500

CHRIS CHRISTIE
Governor

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Lt. Governor

CHRISTOPHER D. CERF
Commissioner

March 28, 2013

Mr. Robert Dandorph, Superintendent
North Bergen School District
7317 Kennedy Boulevard
North Bergen, NJ 07047

Dear Mr. Dandorph:

The New Jersey Department of Education has completed a review of funds received and disbursed from one or more federal programs by the **North Bergen Board of Education**. The funding sources reviewed include titled programs for the Education Jobs Act of 2010 (Ed Jobs) in particular, and/or Elementary and Secondary Education (ESEA) and the Individuals with Disabilities Education Act (IDEA). The review covered the period July 1, 2010 through June 30, 2012. The resulting report is enclosed. Please provide a copy of the report to each board member. All issued Ed Jobs monitoring reports will be posted on the department's website at <http://www.state.nj.us/education/finance/jobs/monitor/>.

Utilizing the process outlined in the attached "Procedures for LEA/Agency Response, Corrective Action Plan and Appeal Process," the North Bergen 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:North Bergen BOE Cover Letter/ Ed Jobs
Enclosures

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Education Jobs Fund Program
New Jersey K-12 Education

**EDUCATION JOBS CONSOLIDATED MONITORING REPORT
MARCH 2013**

District: North Bergen Public Schools
County: Hudson
Dates On-Site: August 7, 8, 9 and 20, 2012
Case #: Ed Jobs-036-11

FUNDING SOURCES

Program	Funding Award
Ed Jobs	\$ 1,859,551
Title I	3,267,925
IDEA Basic	1,855,864
IDEA Preschool	51,917
Title IIA	334,266
Title III	141,896
Title III Immigrant	87,073
Total Funds	<u><u>\$ 7,598,492</u></u>

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BACKGROUND

The *Education Jobs Act of 2010 (Ed Jobs)* 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 Ed Jobs). 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 North Bergen Public Schools to monitor the district's use of *Ed Jobs* 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: Ed Jobs, Title I; Title IIA; Title III; Title III Immigrant; and IDEA Basic and Preschool for the period July 1, 2010 through June 30, 2012.

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, student records, classroom visitations and interviews with instructional staff to verify implementation of the Individualized Education Programs (IEPs). The visit also included a review of student class and related service schedules, interviews of the child study team members and speech-language specialists, and an interview of the program administrator regarding the IDEA grant and 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 that were reviewed included Ed Jobs, Title I, Title IIA, Title III, Title III Immigrant, and IDEA Basic and Preschool from July 1, 2010 through June 30, 2012. 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 AND IDEA FUNDS

Title I Projects

Title I funds were expended to support teacher salaries and benefits. In addition, Title I funds were used for morning, Saturday and summer programs, parental involvement and professional development.

IDEA Projects (Special Education)

The majority of the FY 2012 IDEA Basic 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. In addition, FY 2010-2011 and 2011-2012 IDEA funding provided for additional specialized consultants, specialized supplies and materials for student use, and evaluation and assessment material for the child study team. The IDEA Preschool funds support the cost of tuition.

DETAILED FINDINGS AND RECOMMENDATIONS

Ed Jobs Act

Finding 1:

Condition: The district failed to establish Fund 18 for the recording of Ed Jobs as required. In addition, Ed Jobs funds were not specifically identified in district appropriations and expenditures recorded in their general ledger. Ed Jobs funds were not identified on monthly board secretary 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 establish Fund 18 in their general ledger. All Ed Jobs expenditures must be reclassified into Fund 18.

Finding 2:

Condition: At the time of the monitoring visit, the district did not have complete records available to document expenditures charged to Ed Jobs. Ed Jobs funds were used to fund salaries; however, a schedule of Ed Jobs expenditures by employee was not available for review.

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

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Required Action: The district must prepare a schedule of employees charged to Ed Jobs for FY 2012. The schedule should include the employee's name, position, location, total compensation and compensation charged to Ed Jobs. The district must submit the schedule along with supporting documentation to the NJDOE for review.

Finding 3:

Condition: The district failed to submit quarterly 1512 Jobs reports as required.

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: Future quarterly 1512 Jobs reports must be accurately prepared and filed in a timely manner. A copy must be retained for audit purposes.

Title I

Finding 4:

Condition: The district does not have supporting documents to verify the activity of Title I teachers as required by federal law. The documentation must reflect what the staff is doing, when and where and it must match their funded percentage.

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 Title I funded staff, salaries, funding percentages and time sheets to date to the NJDOE for review.

Finding 5:

Condition: The salary and benefits for the Director of Title I, as stated in the ESEA application did not accurately reflect the percentage of time devoted to the Title I grant related responsibilities.

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 salary and benefits of the administrator charged to Title I to only reflect Title I grant related activities and not state mandated responsibilities (i.e. teacher evaluation or supervision). This matter will be referred to the Office of Fiscal Accountability and Compliance for further review.

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Finding 6:

Condition: The district supplants federal funding by using a portion of Title I funds to pay for Title I teachers to serve as substitute teachers to provide coverage for other classrooms.

Citation: ESEA §1120A(b): *Fiscal Requirements (Federal Funds to Supplement, Not Supplant, Non-Federal Funds)*.

Required Action: The district must cease utilizing this practice. This matter will be referred to the OFAC for further review.

Finding 7:

Condition: For the 2011-2012 school year, an annual meeting to discuss the Title I legislation and inform parents of their children's participation in the Title I program was held late in the school year (June 18, 2012). The annual meeting must be held at the beginning of the school year to allow for parents to have the opportunity to address their child's academic needs throughout the year..

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

Required Action: The district must hold an annual meeting for parents of Title I students to inform them of the Title I program in the beginning of the year. Correspondence inviting parents to attend the annual meeting and documentation of the annual meeting (minutes and sign in sheets) must be submitted to the NJDOE and retained at the district.

Finding 8:

Condition: The district does not have a parental involvement program that reflects the requirements of the Title I legislation. The district did not include the parental involvement school allocations for the school-level on the FY 2011-2012 NCLB Application on the Parent Involvement - School Allocations page. The district did not provide evidence that each Title I school has a parental involvement policy and a school-parent compact that was developed with the input of parents and distributed directly to parents of students participating in the Title I program.

Citation: ESEA §1118: *Parental Involvement*.

Required Action: The district must ensure that Title I funded schools use their Title I parental involvement funds to implement programs and activities that are aligned with the NCLB application and statutory and regulatory requirements. Initially, the district must ensure that each Title I served school has a parental involvement policy and a school-parent compact that was developed with the input of parents and distributed directly to parents of students participating in the Title I program. The district must submit evidence

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of parental input with the development of the parental involvement policy and the school-parent compact along with a copy of the policies and school-parent compact to the NJDOE for review. In addition, a list of its planned parental involvement expenditures for each school must be submitted.

Finding 9:

Condition: The contract with Essex Regional Educational Services Commission (ERESC) for nonpublic services did not indicate that payments were to be made for services rendered. The contract incorrectly stipulated that the district pay ERES in equal monthly installments.

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 provide supporting documentation for payments rendered for the 2011-2012 school years. The documentation must detail the services performed with the costs for each of these services. The FY 2012-2013 contract with ERES must also be revised to stipulate that payments are for services rendered and not on an installment basis. This information must be sent to the NJDOE for review.

Finding 10:

Condition: The district's use of Title I, Part A funds to pay for the consultant to conduct a differentiated learning instruction workshop and organizing Language Arts Literacy Block sessions for Title I Teachers K-four and five-eight and to participate in interviews of literacy coaches supplants state and local funds. These activities either benefited non-Title I students and staff, or were activities that are district responsibilities.

Citation: ESEA §1120A(b): *Fiscal Requirements (Federal Funds to Supplement, Not Supplant, Non-Federal Funds)*.

Required Action: This matter will be referred to the Office of Fiscal Accountability and Compliance for further review.

Title IIA

Finding 11:

Condition: Title IIA funds were expended on unallowable activities. Title IIA funds may only be used to provide teachers for class-size reduction, professional development and materials and supplies associated with professional development. The following expenditures are not allowable:

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2011

- Plato Learning - Student on-line learning and recovery system - \$14,500.
- Classlink - Teacher-student communication system - \$19,156.
- Student Calculators - \$6,921.44.
- Carnegie - On-line student mathematics program - \$24,569.

2012

- Corrugated Cardboard - student project - \$176.
- Classlink - Teacher-student communication system - \$21,370.
- Ras Tech - \$918.75.

Citation: NCLB §2123(b): *Fiscal Requirements (Federal Funds to Supplement, Not Supplant, Non-Federal Funds)*. Title II, Part A Non-Regulatory Guidance.

Required Action: The district must reverse the charges for these unallowable activities and allocate state/local funds, rather than Title IIA funds, to support these expenditures.

Finding 12:

Condition: Anti-Bullying employee: \$20,500 in FY 2011 and \$22,500 in FY 2012 is not an allowable Title IIA cost. Title IIA funds may only be used to provide teachers for class-size reduction, professional development, and materials and supplies associated with professional development. Title II, Part A funds can be used only to pay the salaries of highly qualified teachers hired for the purpose of reducing class size.

Citation: NCLB §2123(b): *Fiscal Requirements (Federal Funds to Supplement, Not Supplant, Non-Federal Funds)*. Title II, Part A Non-Regulatory Guidance

Required Action: The district must reverse the charges for this unallowable activity and allocate state/local funds, rather than Title IIA funds, to support this expenditure.

Title III

Finding 13:

Condition: Title III funds were used to translate district report cards in the amount of \$1,467. This was not a supplemental use of the funds. The translation of report cards is not an allowable cost. This is not a Title III specific cost.

Citation: ESEA §3115(g) Supplement not Supplant.

Required Action: The district must reverse the charges for this unallowable activity and allocate state/local funds, rather than Title III funds, to support this expenditure.

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IDEA (Special Education)

Finding 14:

Condition: In the 2010-2011 grant year, the district misclassified the accounting classification of general supplies (teacher desks, filing cabinets) for instructional services when they should have been listed as support services in their accounting system.

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 update its applications and corresponding accounting records to classify items purchased according to their function.

Finding 15:

Condition: In the 2010-2011 grant year, the district misclassified the accounting classification of tuition in general supplies when it should have been listed as tuition in their accounting system.

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 update its applications and corresponding accounting records to classify items purchased according to their object.

Finding 16:

Condition: In the 2010-2011 grant year, the district misclassified the accounting classification of contracted services as instructional purposes when it should have been listed as purchased technical services – support services in their accounting system.

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 update its applications and corresponding accounting records to classify items purchased according to their function and object.

Finding 17:

Condition: In the 2011-2012 grant year, the district allocated \$94,249 in instructional supplies (100-600) and \$80,752 in supplies and materials (200-600) but did not expend any funds. Further, the district did not amend the grant to properly identify this change in scope.

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Citation: EDGAR, PART 80—*Uniform Administrative Requirements for Grants and Cooperative Agreements to State and Local Governments*, Section 20, Standards for financial management systems; and IDEA Regulation 34 CFR 300 and 301 (*Assistance to States for the Education of Children With Disabilities and Preschool Grants for Children With Disabilities*).

Required Action: The district must amend the grant to accurately reflect their plan.

Special Education

Finding 18:

Condition: The district did not consistently provide parents of students referred and/or eligible for speech-language services notice of a meeting for eligibility and IEP team meetings. In addition, notices of identification, eligibility, reevaluation planning and IEP meetings for students referred and/or eligible for special education and related services or speech-language services did not contain all required components. Specifically, the notices did not include the purpose of the meeting, participants invited to the meeting, provision of PRISE and provision of 1:6A. Noncompliance was due to a lack of implementation of district procedures.

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 that contains all required components, 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 regarding the procedures for implementing the requirements in the citation listed above. Additionally, a monitor from the NJDOE will conduct an on-site visit to review notices of identification meetings, reevaluation planning meetings, eligibility meetings and IEP meetings that occurred between December 2012 and February 2013.

Finding 19:

Condition: The district did not consistently inform parents of proposed actions through provision of written notice containing all required components for students referred and/or eligible for speech-language services for the identification and annual review meetings. Noncompliance was due to a lack of implementation of district procedures.

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)1-7.

Required Action: The district must ensure parents are provided written notice of a meeting that contains all required components within 15 calendar days of the meeting. In order to demonstrate correction of noncompliance, the district must provide training for speech-language specialists regarding the procedures for implementing the

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requirements in the citation listed above. A monitor from the NJDOE will conduct an on-site visit to review written notices provided to parents following identification and annual review meetings held between December 2012 and February 2013.

Finding 20:

Condition: The district did not consistently provide notices of meetings, written notice or conduct meetings in the native language of the parents for students referred and/or eligible for special education and related services or speech-language services. Noncompliance was due to noncompliant district procedures.

Citation: N.J.A.C. 6A:14-2.4(a)1 and (b)1-3.

Required Action: The district must ensure parents are provided with all notices of meetings and that parent conferences are conducted in the native language of the parents. In order to demonstrate correction of noncompliance, the district must revise their procedures to ensure compliance with the citation listed above. In addition, the district must provide training for child study team members and speech-language specialists on the revised procedures. A monitor from the NJDOE will conduct an on-site visit to review notices of meetings and written notice in the native language of the parents along with evidence of meetings conducted in the native language of the parents for meetings held between December 2012 and February 2013.

Finding 21:

Condition: 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 and speech-language services. Noncompliance was due to a lack of implementation of district procedures.

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 regarding procedures for implementing the requirements in the citation listed above. A monitor from the NJDOE will conduct an on-site visit to review evidence of provision of evaluation reports to parents prior to meetings held between December 2012 and February 2013.

Finding 22:

Condition: The district did not provide written notice of graduation within required time lines to students eligible for special education and related services. In addition, the district did not provide to students eligible for special education and related services a

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summary of academic achievement and functional performance prior to graduating and/or exiting. The district's procedures were noncompliant.

Citation: N.J.A.C. 6A:14-4.11(b)2, 4; 20 U.S.C. §1414(c)(5)(B); and 34 CFR §300.305(e)(3).

Required Action: The district must ensure parents or adult students are provided with their summary of academic achievement and functional performance and written notice prior to graduation. In order to demonstrate correction of noncompliance, the district must revise their procedures to ensure compliance with the citations listed above. In addition, the district must provide training for child study team members on the revised procedures. A monitor from the NJDOE will conduct an on-site visit to review correction of noncompliance.

Finding 23:

Condition: The district did not consistently convene identification and annual review meetings with required participants in attendance for students eligible for special education and related services. Noncompliance was due to a lack of implementation of district procedures.

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 maintained in student's records. In order to demonstrate correction of noncompliance, the district must conduct training for child study team members regarding the procedures for implementing the requirements in the citation listed above. A monitor from the NJDOE will conduct an on-site visit to review the signed participation page for meetings conducted between December 2012 and February 2013.

Finding 24:

Condition: 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:

- the supplementary aids and services considered, and/or 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;
- 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.

Noncompliance was due to a lack of implementation of district procedures.

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. 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 regarding the district's procedures. 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 review the revised IEPs, along with the IEPs for students whose annual review meetings were conducted between December 2012 and February 2013. Names of the students with IEPs that were identified as noncompliant will be provided to the district by the monitor.

Finding 25:

Condition: The district did not consistently document in the IEPs of students eligible for speech-language services, a statement describing the consideration of extended school year (ESY) with a description of the program when ESY will be provided. Noncompliance was due to noncompliant district procedures.

Citation: N.J.A.C. 6A:14-4.10(a).

Required Action: The district must ensure IEP documentation indicates a statement describing the consideration of ESY with a description of the program when ESY will be provided. In order to demonstrate correction of noncompliance, the district must revise their procedures to ensure compliance with the citation listed above. In addition, the district must provide training for child study team members on the revised procedures. A monitor from the NJDOE will conduct an on-site visit to review IEPs of students eligible for speech-language services whose IEP meetings were held between December 2012 and February 2013.

Finding 26:

Condition: The district did not consistently provide interventions in general education through the Intervention and Referral Services (I&RS) team to students exhibiting academic difficulties prior to referring the student for an evaluation. In addition, when interventions were provided through I&RS, the district did not maintain documentation of

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the description, frequency, duration and effectiveness of the interventions. Noncompliance was due to a lack of implementation of district procedures.

Citation: N.J.A.C. 6A:14-3.3(b); 20 U.S.C. §1413(f)(2); and 34 CFR §300.226(b).

Required Action: The district must ensure interventions are provided to struggling students prior to referral to the child study team and when the I&RS team identifies interventions to meet the needs of a struggling learner that they identify and maintain documentation of the nature, description, frequency, and duration of the interventions and measure the effectiveness. In order to demonstrate correction of noncompliance, the district must conduct training to administrators and staff regarding the procedures for implementing the requirements in the citation listed above. Additionally, a monitor from the NJDOE will conduct an on-site visit to review documentation for students who were referred to the I&RS team between December 2012 and February 2013.

Finding 27:

Condition: 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. In addition, speech-language specialists were including eligibility determinations in the evaluation reports. Noncompliance was due to a lack of consistent implementation of district procedures.

Citation: N.J.A.C. 6A:14-2.5(b)6; 3.5(c)1-14 and 3.6(b)1-3.

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 addition, the district must ensure determinations for eligibility are made at the eligibility meeting and are not included in the evaluation report. In order to demonstrate correction of noncompliance, the district must conduct training for speech-language specialists regarding the procedures for implementing the requirements in the citation listed above. Additionally, a monitor from the NJDOE will conduct an on-site visit to review initial evaluation reports for students referred for speech-language services whose eligibility meetings were held between December 2012 and February 2013.

Finding 28:

Condition: 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. Noncompliance was due to a lack of implementation of district procedures.

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).

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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 regarding the district's procedures for implementing the requirements in the citation listed above. A monitor from the NJDOE will conduct an on-site visit to review evaluation reports developed for students whose eligibility meetings were held between December 2012 and February 2013.

Finding 29:

Condition: The district does not have a policy for the participation of students with disabilities 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.

Administrative

Finding 30:

Condition: 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.

Finding 31:

Condition: Monitors noted several payments made to vendors without a supporting invoice.

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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 payments must be supported by a vendor invoice.

Finding 32:

Condition: On several occasions, the district did not obtain multiple quotes for purchases between \$5,400 and the bid threshold of \$36,000 as required by New Jersey Public School Contracts Law, Federal procurement law and district policy.

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-37 *Award of purchases, contracts or agreements*.

Required Action: The district must comply with current federal and state procurement regulations and obtain multiple quotes as required.

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.