

February 18, 2010

Mr. David A. Mooij, Superintendent  
Neptune Township Board of Education  
60 Neptune Boulevard  
Neptune, NJ 07753-4836

Dear Mr. Mooij:

The New Jersey Department of Education has completed a review of funds received and disbursed from one or more federal programs by the **Neptune Township Board of Education**. The funding sources reviewed include titled programs for the American Recovery and Reinvestment Act (ARRA) in particular, and/or No Child Left Behind Act (NCLB), the Individuals with Disabilities Education Act (IDEA) and State Fiscal Stabilization Funds (Education Stabilization Fund and Government Stabilization Fund). The review covered the period July 1, 2009 through December 7, 2009. The resulting report is enclosed. Please provide a copy of the report to each board member.

Utilizing the process outlined in the attached "Procedures for LEA/Agency Response, Corrective Action Plan and Appeal Process," the Neptune Township 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 school 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 at (609) 777-3723.

Sincerely,

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

RJC/LDM/tc:Neptune Twp. Board of Education Cover Letter  
Enclosures

### Distribution List

Bret Schundler  
Willa Spicer  
Barbara Gantwerk  
Yut'se Thomas  
Suzanne Ochse  
Anne Corwell  
Glen Forney  
Roberta Wohle  
Ronald Fisher  
Carole K. Morris

**STATE OF NEW JERSEY  
DEPARTMENT OF EDUCATION  
PO BOX 500  
TRENTON, NJ 08625-0500**

**NEPTUNE TOWNSHIP BOARD OF EDUCATION**  
60 NEPTUNE BOULEVARD  
NEPTUNE, NJ 07753  
PHONE: (732) 776-2200



**American Recovery & Reinvestment Act 2009**  
*New Jersey K-12 Education*

**ARRA MONITORING REPORT  
FEBRUARY 2010**

District: Neptune Township Board of Education  
County: Monmouth  
Case #: ARRA-007-09

**FUNDING SOURCES**

Program	Funding Award
State Fiscal Stabilization Fund - Education Stabilization Fund	\$4,530,075
State Fiscal Stabilization Fund - Government Services Fund	175,366
Title I	864,692
Title I SIA	0
ARRA - Title I	506,928
ARRA - Title I SIA	23,386
IDEA - Basic	1,197,980
IDEA - Preschool	37,518
ARRA - IDEA - Basic	1,129,492
ARRA - IDEA - Preschool	40,626
Total ARRA Funds	<u>\$8,506,063</u>

**NEPTUNE TOWNSHIP SCHOOL DISTRICT  
ARRA MONITORING REPORT  
DECEMBER 2009**

**BACKGROUND:**

The *American Recovery and Reinvestment Act of 2009 (ARRA)* and other federal laws require local education agencies (LEAs) to provide programs and services to their schools based on the requirements specified in each of the authorizing statutes (ESEA, IDEA and ARRA). 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 Neptune Township Board of Education to monitor the district's use of ARRA 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: State Fiscal Stabilization Funds (SFSF) including the Education Stabilization Fund (ESF) and Government Services Fund (GSF); Title I; Title I SIA; ARRA-Title I; ARRA-Title I SIA; IDEA Basic; IDEA Preschool; ARRA-IDEA Basic; and ARRA-IDEA Preschool for the period July 1, 2009, through December 7, 2009. The monitoring also included a review of the district's most recent ARRA section 1512 and SFSF cash management quarterly reports to determine whether ARRA expenditures, jobs estimates and related information were reported accurately.

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 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 following dollar amounts of expenditures were reviewed for each program monitored for the period of July 1, 2009 through December 7, 2009:

- Education Stabilization Fund (ESF) 100% of benefit expenditures totaling \$1,777,429 were reviewed;
- Government Services Fund (GSF) 100% of benefit expenditures totaling \$175,366 were reviewed;
- Title I 100% of expenditures totaling \$8,189 were reviewed;
- ARRA Title I had not been expended at the time of the monitoring visit;
- ARRA Title I SIA had not been expended at the time of the monitoring visit;
- IDEA Basic 100% of expenditures totaling \$34,168 were reviewed;

**NEPTUNE TOWNSHIP SCHOOL DISTRICT  
ARRA MONITORING REPORT  
DECEMBER 2009**

- IDEA Preschool 100% of expenditures totaling \$37,518 were reviewed;
- ARRA IDEA Basic had not been expended at the time of the monitoring visit; and
- ARRA IDEA Preschool had not been expended at the time of the monitoring visit;

**GENERAL DISTRICT OVERVIEW OF USES OF TITLE I AND IDEA FUNDS**

**ARRA Title I Projects**

The ARRA Title I funds will be utilized to develop and institute the Neptune Teacher Network so that all teachers and paraprofessionals throughout Neptune Township will receive professional development opportunities to improve instructional strategies as set forth in the 21<sup>st</sup> Century Learning Goals.

During the 2008-2009 school year, the Neptune Township School District began extensive data analysis on student assessment scores. From this examination, it was identified that a vast number of the district's students were within proficiency levels on the state assessments by plus or minus 10 percentage points. Consequently, a decision was made to address the teaching skills and needs of the district teachers in order to change the assessment scores of these students. Areas of greatest emphasis were as follows:

1. Consistency and connectiveness of teacher strategies to align instruction with the curriculum, assessment, and the New Jersey Core Curriculum Content Standards (NJCCCS);
2. The ways in which children learn best (i.e., multiple intelligences, differentiated instruction, cognitive research, etc);
3. Application of scientific based research including 21<sup>st</sup> Century Learning Goals and interdisciplinary themes;
4. Writing across the curriculum;
5. Project-based learning; and
6. Read for learning.

In order to introduce new instructional practices, classroom management strategies, and data analysis approaches, the administration, in collaboration with district teachers, developed three Smart Goals to address the needs of the above-mentioned students. These included:

- By June 2011, Close the Achievement Gap with all subgroups;
- By 2011, the identified students will reach 85% proficiency in Language Arts Literacy and Reading; and
- By 2011, the identified students will reach 85% proficiency in Mathematics.

The administration views these goals as a way to create a new mindset among staff, in order to raise the expectation levels for student learning and achievement. This two-year program plan consists of the following components:

**NEPTUNE TOWNSHIP SCHOOL DISTRICT**  
**ARRA MONITORING REPORT**  
**DECEMBER 2009**

Year 1 – Professional development opportunities for approximately 300 teachers and paraprofessionals, with a stipend for teacher materials either associated with the workshops or to be used to supplement materials in the classroom. Twelve hours of professional development will be allotted per staff member.

Year 2 – Continued professional development opportunities for the remaining district teachers and paraprofessionals (approximately 300 staff members) or follow up workshops from Year 1.

The types of professional development opportunities include the following:

- Collins Writing (Grades 3-12)
- Reading to Learn (Grades 3-5)
- But I'm Not a Reading Teacher (Grades 6-12)
- Accelerated Reader Training (Grades 2-8)
- Teaching Algebra Through Inquiry-Based Instruction (Grades 8-12)
- Mathematics Inquiry-Based Teaching (Grades 5-12)
- Everyday Math (Grades K-4)
- Tools of the Mind (Grades (K-3)
- Challenging Behaviors (All Levels and Parents)

Gains in achievement will be assessed through multiple measures to include the following: continual data analysis across grades and curricular areas, state and local assessments, benchmark assessments, teacher accountability, technology assessments, collaborative teacher planning, parent feedback, and walk-through evaluations as recommended.

It should be noted that the district's emphasis on an integrated data analysis system across grades and curricular areas is to be commended as it represents a holistic approach to improving instructional strategies for teachers and paraprofessionals with the goal to improve student learning and achievement. The ongoing use of data in the classroom, as well as during district planning and needs assessment development, has the potential to serve as a best practices model for use in other districts throughout the state.

### **Title I Projects**

The FY 2010 NCLB Title I funds will be utilized to support and implement an extended day and extended year program known as "The Academy for Students." This program will support instruction for district students who were within proficiency levels on the state assessments by plus or minus 10 percentage points.

The instructional program will be offered to eligible students from 2:50 p.m. – 4:20 p.m. Monday through Friday, as well as during the summer for approximately 6-8 weeks. Instruction will occur in the areas of all New Jersey Core Curriculum Content Standards, as well as in problem solving skills, organizational management, social skill development, and writing across

**NEPTUNE TOWNSHIP SCHOOL DISTRICT  
ARRA MONITORING REPORT  
DECEMBER 2009**

the curriculum, project-based learning, read for learning, and positive behavior support strategies.

Gains in achievement will be assessed through multiple measures to include the following: continual data analysis across grades and curricular areas, state and local assessments, benchmark assessments, teacher accountability, technology assessments, collaborative teacher planning, parent feedback, and walk-through evaluations as recommended.

**ARRA IDEA Projects Basic & Preschool**

The Neptune Township Special Services Department has done research on standardized test scores in order to determine where the classified students are falling short and why. The Director and Supervisor of Special Education held many meetings with administrators, teachers and parents to discuss appropriate usage of ARRA funds. That research has shown that in order to close the educational gap between classified and non classified students the district must give special education students the technical and academic support they need in order to achieve the appropriate grade level Core Curriculum Content Standards. They plan is to close this achievement gap by June 2011.

Cognizant of the importance of saving and creating jobs, Neptune Township School District will utilize funds to that end, ensuring that students with disabilities can access the curricula, utilizing state of the art technology while alleviating auditory distractions inherent in a classroom setting. Supporting this endeavor will be enhanced technology and educational programs along with professional development for special education staff targeting these new programs and initiatives. Funding will be used for the purchase and installation of sound field systems, interactive whiteboards, computers, software, augmentative devices, assistive technology, support materials, special education teacher resource materials and data technology systems to benefit the special education population. Training will be offered to staff in the use of new equipment and materials. The district will continue to maintain its focus on improving academic outcomes for its special education students.

**IDEA Projects Basic & Preschool**

Grant monies are utilized to pay per hour to staff for training and professional development in order to increase teacher effectiveness in special education and inclusion classrooms. Funds are utilized to pay consulting fees for related services providers as required by IEP's and for presenters on special education issues for staff and parents. Monies for supplies are used to purchase instructional and non-instructional materials, for educational trips, and to support the Special Education Parent Advisory Council initiatives. Monies for the nonpublic proportional share are used as per collaborative agreement to meet student needs. A permitted amount of the basic grant is used to supplement school-based budgets, which support the Special Education population of the district.

**NEPTUNE TOWNSHIP SCHOOL DISTRICT  
ARRA MONITORING REPORT  
DECEMBER 2009**

The IDEA Preschool Grant amount designated for preschool is used to supplement district funds to pay for private school tuitions as required by the IEP.

**DETAILED FINDINGS AND RECOMMENDATIONS**

**ARRA Title I Findings and Recommendations**

**Finding 1:**

**Condition:** The *ARRA* Title I Part A guidance stipulates that *ARRA* Title I funds may be used for district wide services as long as these services support the Title I programs in the eligible Title I school attendance areas. The funds cannot be used in school attendance areas that are not Title I eligible, as is the case with Shark River Hills Elementary School.

**Citation:** *ARRA* Guidance, issued September 2, 2009, Question B-7.

**Recommended Action:** The *ARRA* Title I Consolidated Application will be reopened to allow the district to revise information in the Eligibility Step 4 screen. Upon completion of this data entry, the district will resubmit the application.

The NJDOE is working to obtain clarification from the USDE Title I Office on whether or not a district wide program can benefit a Title I eligible school that is not funded with *ARRA* Title I funds, as is the case with Neptune Township High School. As soon as this clarification is obtained, further revisions to the application may be necessary.

**Required Action:** The district must ensure that the *ARRA* Title I funds are not utilized for the Shark River Hills Elementary School or serve this school in Eligibility Step 4.

**Finding 2:**

**Condition:** The nonpublic school enrollment information contained in the nonpublic school free and reduced lunch status report does not match the nonpublic school low-income enrollment data that is entered in the Eligibility Step 1 screen in the *ARRA* Title I Consolidated Application. The application information shows that zero (0) nonpublic low-income students exist for Neptune Middle School (grades 6-8); however, the nonpublic school free and reduced lunch status report shows that seven (7) nonpublic low-income students exist for Neptune Middle School.

**Citation:** *NCLB* § 1120 (Participation of Children Enrolled in Private Schools).

**Required Action:** The *ARRA* Title I Consolidated Application will be reopened to allow the district to revise the nonpublic student low-income enrollment data in the Eligibility Step 1 screen.



**NEPTUNE TOWNSHIP SCHOOL DISTRICT  
ARRA MONITORING REPORT  
DECEMBER 2009**

**Finding 3:**

**Condition:** The district did not have completed Affirmation of Consultation forms or Nonpublic School Refusal of Funds forms for two (2) nonpublic schools eligible for *ARRA* Title I services.

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

**Required Action:** The district must submit its Affirmation of Consultation forms and Nonpublic School Refusal of Funds forms for *ARRA* Title I funds to the NJDOE for review.

**Finding 4:**

**Condition:** The district did not provide sufficient documentation to verify that an initial consultation meeting occurred with all eligible nonpublic school officials.

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

**Recommend Action:** In order to ensure ongoing, timely, and meaningful nonpublic school consultation, it is recommended that the district institute steps to enhance its record keeping of its initial contact, as well as its ongoing contact, with the nonpublic schools. This is to be accomplished by establishing procedures to track nonpublic school contact via certified return receipt letters, telephone logs, and e-mail logs, as well as to include meeting agendas and sign-in sheets in the district's internal nonpublic audit files.

**Finding 5:**

**Condition:** The district budgeted *ARRA* Title I funds for the Salaries and Benefits of a nonpublic school teacher. The funds cannot be used for the salary of a nonpublic school teacher since this person is not an employee of the Neptune Township School District.

**Citation:** *NCLB* § 1120 (Participation of Children Enrolled in Private Schools).

**Required Action:** The district agreed to revise the *ARRA* Title I Budget by removing the budgeted cost for the Salaries and Benefits of a nonpublic school teacher as listed presently under the 100-100 FICA Only tab.

**Finding 6:**

**Condition:** Nonpublic school documentation showed that *ARRA* Title I funds were being used to purchase computers and printers.

**Citation:** *NCLB* § 1120 (Participation of Children Enrolled in Private Schools).

**NEPTUNE TOWNSHIP SCHOOL DISTRICT  
ARRA MONITORING REPORT  
DECEMBER 2009**

**Required Action:** The district should obtain the program plan from the nonpublic school to verify that the purchase of computers and printers supports the Title I program being provided to the eligible nonpublic school students. If this documentation does not verify that the use of these funds, as described above, supports the Title I program for eligible nonpublic school students, the *ARRA* Title I budget must be revised to show the removal of these budgeted costs for this purpose.

**Title I Findings and Recommendations**

**Finding 1:**

**Condition:** The district did not have completed Affirmation of Consultation forms or Nonpublic School Refusal of Funds forms for two (2) nonpublic schools eligible for FY 2010 *NCLB* Title I services.

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

**Required Action:** The district must submit its Affirmation of Consultation forms and Nonpublic School Refusal of Funds forms for the FY 2010 *NCLB* Title I funds to the NJDOE for review.

**Finding 2:**

**Condition:** The district did not provide sufficient documentation to verify that an initial consultation meeting occurred with all eligible nonpublic school officials.

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

**Recommend Action:** In order to ensure ongoing, timely, and meaningful nonpublic school consultation, it is recommended that the district institute steps to enhance its record keeping of its initial contact, as well as its ongoing contact, with the nonpublic schools. This is to be accomplished by establishing procedures to track nonpublic school contact via letters sent via certified mail, telephone logs, and e-mail logs, as well as to include meeting agendas and sign-in sheets in the district's internal nonpublic audit files.

**Finding 3:**

**Condition:** The district uploaded to the FY 2010 *NCLB* Consolidated Application only the list of SES providers selected by the district. The current SES guidance requires that the list contain the names and contact information for all eligible SES providers in the state.

**Citation:** Title I, Section 1116(e) of the *No Child Left Behind Act (NCLB)*.

**NEPTUNE TOWNSHIP SCHOOL DISTRICT  
ARRA MONITORING REPORT  
DECEMBER 2009**

**Required Action:** The FY 2010 NCLB application will be reopened, to allow the District to upload the list of statewide SES providers.

**ARRA IDEA and IDEA Findings and Recommendations**

**Finding 1:**

**Condition:** The Neptune Township School District did not consistently obtain affirmation of consultation for nonpublic services for both IDEA Basis and ARRA IDEA Basic funds.

**Citation:** IDEA Regulations 34CFR §300.130-300.144.

**Required Action:** The district must develop procedures to consistently obtain affirmation of consultation for nonpublic services for both IDEA Basis and ARRA IDEA Basic funds.

**Finding 2:**

**Condition:** The plan for ARRA IDEA Basic does not specify the expenditures for nonpublic funds.

**Citation:** IDEA Regulations 34CFR §300.130-300.144.

**Required Action:** The plan for the ARRA IDEA Basic must be revised to include how nonpublic funds will be expended.

**Finding 3:**

**Condition:** The Neptune Township School District did not provide proof that the required consultation meeting with nonpublic schools for the ARRA IDEA Basic grant program were conducted.

**Citation:** IDEA Regulations 34CFR §300.130-300.144.

**Required Action:** The Neptune Township School District must conduct the required consultation meeting with nonpublic schools for the ARRA IDEA Basic grant program.

**Finding 4:**

**Condition:** The Neptune Township School District did not produce a list of students identified for ARRA IDEA Basic nonpublic services. The Individual Service Plans (ISP) did not include the services and the funding source.

**NEPTUNE TOWNSHIP SCHOOL DISTRICT  
ARRA MONITORING REPORT  
DECEMBER 2009**

**Citation:** IDEA Regulations 34CFR §300.130-300.144.

**Required Action:** The district must develop a separate list of nonpublic students and services for the ARRA IDEA Basic grant. The individual service plans must be revised to reflect the ARRA IDEA Basic funding source and specify the services provided.

**Finding 5:**

**Condition:** The IDEA Basic consolidated grant is missing the assurance for preschool nonpublic zero count.

**Citation:** IDEA Regulations 34CFR §300.130-300.144.

**Required Action:** The IDEA Basic consolidated grant must be revised to include the assurance for preschool nonpublic zero count.

**Financial Management and Reporting Findings and Recommendations**

The review in this area 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 Ronald Fisher at (609) 777-3723 or via email at [Ronald.Fisher@doe.state.nj.us](mailto:Ronald.Fisher@doe.state.nj.us).