

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

BARNEGAT TOWNSHIP SCHOOL DISTRICT
550 BARNEGAT BOULEVARD
BARNEGAT, NJ 08005
PHONE: (609) 698-5800



New Jersey K-12 Education

CONSOLIDATED MONITORING REPORT
AUGUST 2014

District: Barnegat Township School District
County: Ocean
Dates On-Site: October 19 and 20, 2013
Case #: CM-047-13

FUNDING SOURCES

Program	Funding Award
Title I, Part A	\$ 358,604
Title II, Part A	81,329
IDEA Basic	720,191
IDEA Preschool	31,227
Total Funds	<u>\$ 1,191,351</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 Barnegat Township 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); and IDEA Basic and Preschool for the period July 1, 2012 through October 20, 2013.

The scope of work performed included the review of documentation including grant applications, program plans and needs assessments, grant awards, annual audits, board minutes, payroll records, accounting records, purchase orders, and current district policies and procedures. The monitoring team members reviewed the supporting documentation for a sample of expenditures and conducted internal control reviews, as well as conducted interviews with program administrators and other district personnel as required. Additionally, the IDEA grant review included 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, and interviews of child study team members and speech-language specialists.

EXPENDITURES REVIEWED

The grants that were reviewed included Title I, Title II, and IDEA Basic and Preschool for the period July 1, 2012 through October 20, 2013. A sampling of purchase orders was taken from the entire population and later identified as to the grant that was charged.

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GENERAL DISTRICT OVERVIEW OF USE OF TITLE I, TITLE II AND IDEA FUNDS

Title I

The district operates targeted assistance programs at its Title I funded schools: Lillian M. Dunfee and Robert Horbelt L. Elementary Schools. The district has identified Closing the Achievement Gap for all students as its priority problem.

Title II

Title II funds were used for class size reduction and professional development.

IDEA (Special Education)

The district used IDEA Basic and Preschool funds to reduce district tuition costs for students receiving special educational services in other public school districts and approved private schools for students with disabilities.

DETAILED FINDINGS AND RECOMMENDATIONS

Title I

Finding 1: The district's use of Title I funds for the following expenditure in a non-Title I school supplanted state/local funds: Apple Inc. PO# 14-4708. Title I funds may only benefit students in Title I funded schools.

Citation: ESEA §1120A (b) (1)): *Federal Funds to Supplement, Not Supplant, Non - Federal Funds.*

Required Action: The district must reverse the charge for this unallowable activity and allocate state/local funds, rather than Title I funds, to support the expenditure. The district must provide documentation of the adjusting journal entry to the NJDOE for review.

Finding 2: The notification letters sent to the parents/guardians of identified Title I students did not include clearly defined entrance and exit criteria. The parents/guardians of identified Title I students must be informed of the multiple educationally related criteria, as well as benchmark assessment scores used to identify their child/children for Title I services.

Citation: ESEA §1115(B): *Targeted Assistance Programs (Eligible Children from Eligible Population).*

Required Action: The district must include in its parental notification letters clearly defined entrance and exit criteria. The district must provide a copy of its revised parental notification letter to the NJDOE for review.

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Finding 3: The district could not provide evidence of when its Title I written parental involvement policy was distributed. Per the legislative requirement, parents/guardians of Title I students have a right to be involved in the development of the written parental involvement policy, as well as being informed of ways they can further engage themselves in the academic performance and achievement of their children.

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

Required Action: For FY 2014-2015, the district must ensure its Title I schools distribute their written parental involvement policy to parents/guardians of the Title I students no later than mid-October. The district must send a copy of the revised policy along with a description of the mechanism to distribute the policy to the NJDOE for review.

Finding 4: The district could not provide documentation that its Title I schools convened their annual Title I parent meeting. The parents/guardians of identified Title I students are entitled to be informed about the school's participation in the Title I program, legislative requirements, and ways in which they can be involved in helping their child/children succeed academically.

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

Required Action: For FY 2014-2015, the district's Title I schools must convene their annual Title I parent meeting for the parents/guardians of identified Title I students no later than mid-October. The district must send documentation (e.g., invitational letter/flyer, agenda, meeting minutes, and sign in sheets) of the meeting to the NJDOE for review.

Finding 5: The district could not provide documentation of consulting with nonpublic schools that enroll resident students. The district must make a good faith effort to consult with nonpublic school officials to ensure eligible students from its attendance areas receive Title I services. Such consultation includes a discussion of the following: poverty data collected, student identification, and services for eligible students, parents and teachers.

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

Required Action: For FY 2014-2015, the district must formalize its nonpublic consultation process. The district must retain signed/certified receipts of correspondence to nonpublic schools, copies of Affirmation of Consultation forms signed by all consulted parties, and refusal forms. The district must also submit copies of meeting agenda, minutes, and sign in sheets to the NJDOE for review.

Title II

Finding 6: A comparison of the approved FY 2012-2013 Title II budget and the district's accounting records revealed transfers which: 1) exceeded the 10% threshold for submitting an

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amendment application and 2) moved funds from approved line items to other approved/unapproved line items.

Citation: ESEA-NCLB *New Jersey Consolidated Formula Sub-grant Reference Manual, Section II, Consolidated Application Process, Amendments*; and N.J.A.C. 6A:23-2.1: *Prescribed system of double-entry bookkeeping and GAAP accounting.*

Required Action: The district must monitor and track expenditures by function and object code to ensure funds are spent in accordance with approved budgets. Amendment applications must be submitted timely, if required, to ensure compliance with departmental regulations/guidelines.

Recommendation 1: The completed appropriate New Jersey Highly Qualified Teacher Approved Forms: www.state.nj.us/education/profdev/nclb should be included in every teacher's personnel file along with a copy of any supporting documentation(s) such as; teaching certificate(s), Praxis scores, transcripts, and/or National Board Certification.

Recommendation 2: Highly qualified forms and documentation should be kept in the personnel file in a secure location, at the district Board of Education Office.

IDEA (Special Education)

A review of the IDEA grant program activities yielded no findings.

Administrative

Finding 7: On several occasions, the district failed to issue a purchase order prior to services being rendered (confirming orders). District policy and state regulations require that a properly executed purchase order be issued prior to services being rendered.

Citation: 34 CFR §80.20: *Standards for financial management systems*; and N.J.S.A. 18A:18A 2(v): *Public School Contracts Law.*

Required Action: The district must implement a process to ensure that purchase orders are issued prior to receiving goods and services from vendors.

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 Lori Ramella via phone at (609) 984-0937 or via email at lori.ramella@doe.state.nj.us.