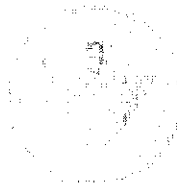


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New Jersey K-12 Education

CONSOLIDATED MONITORING REPORT
APRIL 2016

District: Garfield Public Schools
County: Bergen
Dates On-Site: February 9, 10 and 11, 2016
Case #: CM-008-15

FUNDING SOURCES

Program	Funding Award
Title I, Part A	\$1,248,012
IDEA Basic	1,248,065
IDEA Preschool	27,693
Title II, Part A	165,215
Title III	55,150
Title III Immigrant	26,359
Total Funds	<u><u>\$2,770,494</u></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 and IDEA). 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 Garfield 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; Title III Immigrant and IDEA Basic and Preschool for the period July 1, 2014 through January 31, 2016.

The scope of work performed included the review of documentation including grant applications, program plans and needs assessments, grant awards, annual audits, board minutes, payroll records, accounting records, purchase orders, a review of student records, classroom visitations and interviews with instructional staff to verify implementation of Individualized Education Programs (IEP), a review of student class and related service schedules, interviews of child study team members and speech-language specialists and an interview of the program administrator regarding the IDEA grant, as well as current district policies and procedures. The monitoring team members also conducted interviews with district personnel, reviewed the supporting documentation for a sample of expenditures and conducted internal control reviews.

EXPENDITURES REVIEWED

The grants reviewed included Title I, Title II, Title III, Title III Immigrant and IDEA Basic and Preschool from July 1, 2014 through January 31, 2016. 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

The district uses its Title I, Part A funding to serve nine of the 10 schools, and conducts schoolwide programs in all of the nine Title I served schools. The district blends part of its Title I allocation and utilizes the unblended portion of Title I funding for activities and costs such as, but not limited to, instructional salaries and benefits, instructional materials/supplies, credit recovery software, and parental involvement activities.

IDEA Projects

The IDEA Basic funds are being used to reduce district tuition costs for students receiving special educational services in approved private schools for students with disabilities and for the purchase of equipment.

DETAILED FINDINGS AND RECOMMENDATIONS

Title I

Finding 1: The district did not have a parental involvement program that reflected the requirements of the Title I legislation. There is no evidence the district's Title I parental involvement policy was reviewed and board adopted since May 23, 2006, and no evidence of current Title I school-level parental involvement policies. The annual review and current board adoption allow parents and other stakeholders to impact the parental involvement process and identify the unique needs of the Title I schools and parents of Title I students. For FY 2015-2016, Title I parents and associated stakeholders must be included in the development processes.

Citation: ESEA §1118(a)(2): *Parental Involvement (Local Educational Agency Policy)*;
ESEA §1118(b): *Parental Involvement (School Parental Involvement Policy)*.

Required Action: The district must have a written district parental involvement policy evaluated annually with current board adoption along with current school-level parental involvement policies. Copies of a recent board approved district parental involvement policy must be submitted to the NJDOE for review. Additionally, evidence of parental input into the development of the Title I parental involvement policies must be documented with meeting agendas, sign in sheets and minutes, and forwarded to the NJDOE for review.

Finding 2: For FY 2015-2016, the district provided evidence of school-parent-student compacts in multiple languages, but did not provide evidence that the school-parent-student compacts were developed in conjunction with Title I parents. The absence of parent participation in developing these required documents excluded parents from more active participation in their child's educational program. In addition, some of the school-parent-student compacts provided required

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student signatures; there must be consistency in the documents presented. It is important that the student's role in his or her educational program be included.

Citation: ESEA §1118(d): *Parental Involvement (Shared Responsibilities for High Student Academic Achievement)*.

Required Action: The district must develop school-parent-student compacts that include the student's role and the associated stakeholder groups in the development process. For FY 2015-2016, the district must include and document that Title I parents were involved in the development process. The district must submit documentation (e.g., meeting invitations/flyers; agendas, sign in sheets) of parental involvement in the development of the compacts to the NJDOE for review.

Finding 3: For FY 2015-2016, the district provided insufficient evidence that its Title I schools convened an annual Title I parent meeting that met the legislative requirements. The Basic Skills Instruction Parent Advisory Council Meeting did not satisfy the legislative requirements. Not conducting an annual meeting at the beginning of the year to explain the Title I legislation and the school's Title I programs did not allow parents to be informed and vested in the Title I process from the start.

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

Required Action: The district's Title I schools must convene and sufficiently document their FY 2016-2017 annual Title I school meetings for the parents/guardians of all students. All meetings must be held no later than mid-October. The district must submit evidence of the meetings (e.g., invitational letter/flyer, agenda, meeting minutes, and sign in sheets) to the NJDOE for review.

Finding 4: The Schoolwide Stakeholder Engagement Committee representation at each school did not consistently include at least one community and one parent representative not affiliated with the district's Board of Education, and a student representative on the high schools' committees. Also, the Schoolwide Stakeholder Engagement Committee meetings documented at each school did not reflect, at a minimum, the required quarterly meetings.

Citation: ESEA §1114(b): *Schoolwide Programs (Components of a Schoolwide Program)*.

Required Action: The district's Title I schools must expand their Title I Schoolwide Stakeholder Engagement Committees to include the aforementioned representatives, and convene quarterly meetings, at a minimum. The district must send an updated list of the stakeholder committee members (including the person's name and associated constituent group) for each of its Title I schoolwide programs to the NJDOE for review.

Finding 5: The district provided a letter, dated May 2015, announcing the planning meeting for nonpublic schools; however, the district failed to provide evidence the letters were distributed.

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In addition, the date and timing of the letter and the meeting were late in the year and did not reflect best practices for notification and collaboration. The district provided a sample executed refusal form from one of the nonpublic schools contacted; however, the form did not contain the dollar amount the school was entitled to receive in services for its students. The omission of this information did not afford the nonpublic schools an opportunity to make a decision based on actual eligible dollar amounts for proposed services to its students.

Citation: ESEA §1120: *Participation of Children Enrolled In Private Schools.*

Required Action: The district must contact the nonpublic schools within and outside the attendance area that enroll resident students in a timely manner to ensure Title I eligible students receive Title I services in a timely manner. The district must use the Nonpublic School Survey to generate accurate enrollment and low-income nonpublic student data. In addition, the district must start its outreach process to nonpublic schools earlier in the year. The district must begin the consultation process to identify eligible Title I students and develop a service delivery plan in the spring of the prior school year. The district must calculate the Title I allocation for the nonpublic schools and include that information on the refusal form so the nonpublic schools can make an informed decision about services for their students. For FY 2016-2017 the district must send documentation of the consultation process (e.g., invitational letters, agendas, meeting notes, sign in sheets, etc.) to the NJDOE for review.

Title II

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

Title III

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

Title III Immigrant

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

IDEA (Special Education)

Finding 6: The district did not consistently provide parents of students referred and/or eligible for speech-language services notice of a meeting for identification, eligibility, reevaluation planning and IEP team meetings.

Citation: N.J.A.C. 6A:14-2.3(k)3,5; 20 U.S.C. §1414(b)(1); and 34 CFR §300.304(a).

Required Action: The district must provide parents notice of a meeting in writing early enough to ensure they have an opportunity to attend. In order to demonstrate correction of noncompliance, the district must conduct training for child study team members and

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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 meeting documentation for meetings conducted between September 2016 and December 2016, and to review the oversight procedures.

Finding 7: The district did not consistently conduct identification meetings within 20 calendar days of receipt of a written request for a speech-language evaluation to determine if an evaluation was warranted.

Citation: N.J.A.C. 6A:14-2.5(b)6; 3.3(e) and 3.6(b).

Required Action: The district must ensure identification meetings are conducted within 20 calendar days of receipt of a written request for evaluation. In order to demonstrate correction of noncompliance, the district must conduct training for speech-language specialists and develop an oversight mechanism to ensure compliance with the requirements in the citations listed above. A monitor from the NJDOE will conduct an on-site visit to interview staff, review documentation from meetings conducted between September 2016 and December 2016, and to review the oversight procedures.

Finding 8: 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).

Required Action: The district must ensure a multidisciplinary evaluation is conducted for students referred for speech-language services by obtaining a written statement from the general education teacher that details the educational impact of the speech problem on the student's progress in general education. In order to demonstrate correction of noncompliance, the district must conduct training for speech-language specialists and develop an oversight mechanism to ensure compliance with the requirements in the 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 speech-language services between September 2016 and December 2016, and to review the oversight procedures.

Finding 9: The district did not consistently document all required considerations and statements in the IEPs of students eligible for speech-language services. IEPs did not consistently include:

- participation in district wide assessments; and
- approved accommodations and modification on district and statewide assessments.

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

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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 speech-language specialists and develop an oversight mechanism to ensure compliance with the requirements in the citations listed above. To demonstrate that the district has corrected the individual instances of noncompliance, the district must conduct annual review meetings and revise IEPs for specific students whose IEPs were identified as noncompliant. A monitor from the NJDOE will conduct an on-site visit to interview staff, review the revised IEPs, along with a sample of IEPs for students whose annual review meetings were conducted between September 2016 and December 2016, and to review the oversight procedures. For assistance with correction of noncompliance, the district is referred to the state IEP sample forms which are located at: www.state.nj.us/education/specialed/form/.

Finding 10: The district did not consistently provide to students eligible for special education and related services written notice of graduation and the summary of academic achievement and functional performance prior to graduating or exiting.

Citation: N.J.A.C. 6A:14-4.11(b) 1.4; and 20 U.S.C. §1414(c)(5)(B); and 34 CFR §300.305(e)(3).

Required Action: The district must ensure written notice of graduation and a summary of academic achievement and functional performance is provided to parents or adult students prior to graduating or exiting the program. 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 copies of written notice of graduation and the summary of academic achievement and functional performance provided to students graduating or exiting at the conclusion of this school year, and to review the oversight procedures.

Finding 11: The district did not consistently document required transition components in the IEPs of students eligible for special education and related services ages 16 or above. IEPs did not consistently include evidence of the following:

- measurable postsecondary goal(s) were based on age appropriate transition assessments; and
- annual review goal related to the student's transition service needs.

Citation: N.J.A.C. 6A:14-3.7(e)12.

Required Action: The district must ensure the IEPs for students age 16 or above include all required components. In order to demonstrate correction of noncompliance, the district must conduct training for child study team members and develop an oversight mechanism to ensure compliance with the requirements in the citation listed above. To demonstrate that the district has corrected the individual instances of noncompliance, the

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district must conduct annual review meetings and revise IEPs for specific students with IEPs that were identified as noncompliant. A monitor from the NJDOE will conduct an on-site visit to interview staff, review the revised IEPs along with a sample of IEPs of students age 16 and over developed at meetings conducted between September 2016 and December 2016, and to review the oversight procedures.

Finding 12: The district did not consistently provide to students beginning at age 14, written invitations to meetings where post-school transition was being discussed.

Citation: N.J.A.C. 6A:14-2.3(k)2x; and 34 CFR §300.322(a)(2).

Required Action: The district must ensure each student with an IEP age 14 or above is provided with a written invitation to any IEP meeting where transition to adult life will be discussed. 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 copies of invitations to IEP meetings to students age 14 and above for meetings conducted between September 2016 and December 2016, and to review the oversight procedures.

Administrative

Finding 13: The district did not provide detailed schedules, by individual, of salaries that agreed to the expenditures charged to the programs in the general ledger.

Citation: Uniform Grant Guidance 2 C.F.R. 200.302.

Required Action: The district must maintain records that account for the salary amounts charged to the federal grants by individual.

Recommendation 1 (Title I): In the district's amended ESEA-NCLB Consolidated Subgrant Application the amounts listed in the Fund 15 Blended and the Fund 20 Unblended columns did not equal the Public Allocation for each school on the Title I Schoolwide Blended tab. The two columns (Fund 15 and Fund 20) must equal the Public Allocation for each school that is reflected on Eligibility - Step 4 and the Title I Schoolwide Blended tabs.

Citation: ESEA §1114(a)(3)(C): *Schoolwide Programs (Records)*; Uniform Guidance 2 CFR 200.302, Financial Management.

Recommended Action: The district must revisit the amended ESEA-NCLB Subgrant Application to adjust the figures to reflect the amounts the district wants as blended and unblended funds. The revised figures in the Fund 15 Blended and Fund 20 Unblended columns must equal the Public Allocation for each school that is reflected on Title I - Eligibility Step 4 and the Title I Schoolwide Blended tabs.

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Recommendation 2 (Title I): The Title I Parental Involvement Reserve of \$12,292 indicated on Title I Eligibility - Step 4 of the district's FY 2015-2016 ESEA-NCLB Consolidated Subgrant Application was not itemized at the school-level on the Parent Involvement – School Allocations tab. Not including the school-level amount(s) did not allow for verification that 95 percent of the district reserve is budgeted and expended at the school-level.

Citation: ESEA §1118(a)(3)(C); *Parental Involvement (Reservation)*; Uniform Guidance 2 CFR 200.302, Financial Management..

Recommended Action: The district must include the amount(s) budgeted for school-level Title I parental involvement activities on the Parent Involvement – School Allocations tab in the ESEA-NCLB Consolidated Subgrant Application.

Recommendation 3: The district did not have a current purchasing manual that details procedures for the procurement of goods and services.

Citation: Uniform Grant Guidance 2 C.F.R. 200.302; N.J.A.C. 6A:23A-6.6 Standard operating procedures for business functions.

Recommended Action: The district should prepare and adopt a detailed purchasing manual to ensure compliance with current state and federal procurement regulations.

The NJDOE thanks you for your time and cooperation during the monitoring visit and looks forward to a successful resolution of all findings and implementation of all recommendations contained in this report.

If you have any questions, please contact Steven Hoffmann via phone at (973) 621-2750 or via email at steven.hoffmann@doe.state.nj.us.