



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

CHRIS CHRISTIE  
*Governor*

KIM GUADAGNO  
*Lt. Governor*

DAVID C. HESPE  
*Commissioner*

February 26, 2015

Mr. John Scavelli, Jr.  
Chief School Administrator  
Evesham Township School District  
25 South Maple Avenue  
Marlton, NJ 08053

Dear Mr. Scavelli:

The New Jersey Department of Education has completed a review of funds received and disbursed from one or more federal programs by the **Evesham Township 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 January 28, 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 <http://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 Evesham 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 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 Frank Basso at (609) 984-5909.

Sincerely,

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

RJC/FB/dk: Evesham Twp. BOE Cover Letter /consolidated monitoring  
Enclosures

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**EVESHAM TOWNSHIP SCHOOL DISTRICT**  
25 S. MAPLE AVE.  
MARLTON, NJ 08053  
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*New Jersey K-12 Education*

**CONSOLIDATED MONITORING REPORT**  
February 2015

**District:** Evesham Township School District  
**County:** Burlington  
**Dates On-Site:** January 28 and 29, 2015  
**Case #:** CM-007-14

**FUNDING SOURCES**

Program	Funding Award
Title I, Part A	\$ 241,592
Title II, Part A	103,148
Title III, Part A	13,299
IDEA Preschool	70,799
IDEA Basic	1,119,085
Total Funds	<hr/> <hr/> \$ 1,547,923

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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 Evesham 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); Title III, Part A (Title III); IDEA Basic and Preschool for the period July 1, 2013 through January 28, 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, IDEA Basic and Preschool from July 1, 2013 through January 28, 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 and IDEA FUNDS**

**Title I**

The district is using its FY 2014-2015 Title I funds to implement targeted assistance programs in two of its elementary schools. Primarily, the district provides tutoring services through pullout programs. Title I funds in previous project periods were spent on similar programs.

**Title II**

The district is using its FY 2014-2015 Title II funds primarily for stipends to support professional development activities beyond the school day. In addition, the district dedicated a portion of its Title II funds for the mentoring of two new assistant principals. Professional development activities were found to be in accordance with the District Professional Development Plan.

**Title III**

The district is using its FY 2014-2015 Title III funds for materials and supplies and to partially fund the salary of a teacher's aide.

**IDEA (Special Education)**

The district is using its FY 2014-2015 IDEA Basic funds to reduce district tuition expenditures for students receiving special educational services in private schools for students with disabilities. A portion of the funds are allocated to purchase instructional supplies, technology for special education students, professional development for the child study team, special education teachers and related service providers. In addition, funds will be used for child study team supplies and testing materials. The district's nonpublic proportionate share is used to provide supplemental instruction, speech therapy, occupational therapy and counseling services for students attending nonpublic schools.

**DETAILED FINDINGS AND RECOMMENDATIONS**

**Finding 1:** The district's Title I schools did not provide school-level Title I parental involvement policies.

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

**Required Action:** The district should provide technical assistance to its schools in the development of school-level parental involvement policies and ensure that its schools work with their stakeholder groups to develop the policies and review it annually. The district must submit copies of each school's policy to the NJDOE for review. The district must also submit evidence (e.g., meeting agendas, sign in sheets, minutes) of engaging parents in the development and review of the policies.

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**Finding 2:** The FY 2014-2015 Title I school-parent compact outlined the responsibilities of the parents and school only. The compacts did not include the roles and responsibilities of the students. The exclusion of the students' roles and responsibilities does not offer all parties an opportunity to understand their role in the shared responsibilities for student academic achievement.

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

**Required Action:** The district's Title I schools must revise their school-parent compacts to include the roles and responsibilities for the school, parent, and student in increasing student achievement. The district must submit the revised FY 2014-2015 school-parent compacts to the NJDOE for review.

**Finding 3:** The district did not pay the TPAF/FICA reimbursement report timely for FY 2013-2014. The liquidation of \$18,011.70 was paid on September 30, 2014 after the 45 day liquidation period expired. Therefore, this expenditure cannot be charged to the FY 2013-2014 final report

**Citation:** N.J.S.A. 18A:66-90, *Reimbursement of TPAF/FICA*, EDGAR, PART 80--*Uniform Administrative Requirements for Grants and Cooperative Agreements to State and Local Governments*, Section 23, Period of Availability of Funds.

**Required Action:** The late encumbrance of FY 2013-2014 funds is being referred to the Office of Fiscal Accountability and Compliance for follow up.

**Finding 4:** The district is not posting expenses to the grants as incurred and is not charging all the funded staff to the grant. The district must charge funded staff in a timely manner.

**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:** During the monitoring visit, the district made the necessary corrections to charge all applicable staff. No further action is required.

**Finding 5:** The district did not track expenditures by attendance areas to ensure the expenses for Title I schools are consistent with each attendance area's allocation on Eligibility Page, Step 4 of the FY 2014-2015 ESEA-NCLB Consolidated Application. Tracking of expenditures is an internal control to ensure each school is receiving programs and services up to the amount of funding generated by each school.

**Citation:** EDGAR, PART 80--*Uniform Administrative Requirements for Grants and Cooperative Agreements to State and Local Governments*, Section 20, Standards for financial management systems; ESEA §9306(a)(5): *Other General Assurances (Assurances)*.

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**Required Action:** The district must track Title I school-level allocations reflected in the FY 2014-2015 ESEA-NCLB Consolidated Application for Title I funds (Eligibility Page, Step 4). The district must submit a schedule showing the district budget matches the allocations to the NJDOE.

**Finding 6:** The district charged a purchase order for \$3,000 to the FY 2012-2013 grant that was not liquidated during the 45 day liquidation period. Subsequently, the funds were carried into the FY 2014-2015 project period without NJDOE approval.

**Citation:** PART 80--*Uniform Administrative Requirements for Grants and Cooperative Agreements to State and Local Governments*, Section 23, Period of Availability of Funds.

**Required Action:** The late encumbrance of FY 2013-2014 funds is being referred to the Office of Fiscal Accountability and Compliance for follow up.

## **Title II**

**Finding 7:** The district used a portion of its Title II funds for stipends to support mentoring of new assistant principals. As mentoring for new assistant principals is a mandated activity, 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 Title II application, use state/local funds to support this program and repurpose the Title II funds dedicated for new assistant principal mentoring 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.

## **Title III**

**Finding 8:** The district's parental notification letter did not outline all of the Title III parental notification requirements. Although the district has a parental notification letter for students identified as English Language Learners (ELLs), there is no letter for parents that specifically outlines the requirements of Title III. The missing elements that need to be included in the parental notification letter are: how students will meet the state standards, students' level of English proficiency, how such level was assessed, how the program will meet the needs of the child in attaining English and meeting state standards, program exit requirements, expected rate of transition out of the program, and how the program will meet the objectives of an individualized education program of a child with a disability. Failure to include this information excludes parents from a complete understanding of the program their children are entering.

**Citation:** ESEA §3302: *Parental Notification*.

**Required Action:** The district's Title III parental notification letter needs to outline the specific requirements for Title III and then must be submitted for review. A sample letter

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can be located at:  
<http://www.state.nj.us/education/bilingual/title3/accountability/notification/title3par.htm>.  
Evidence of a revised letter in English and the most common ELL parent language(s) must be developed and submitted to the NJDOE for review.

**IDEA (Special Education)**

**Finding 9:** 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 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)4.

**Required Action:** The district must ensure for students placed in separate settings, the IEP team identified 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 revised IEPs, along with a random sample of additional IEPs developed at meetings conducted between May 2015 and September 2015, and to review the oversight procedures. Names of the students whose IEPs were identified as noncompliant will be provided to the district by the monitor.

**Finding 10:** The district did not conduct meetings within 20 calendar days of receipt of a written request for a child study evaluation.

**Citation:** N.J.A.C. 6A:14-3.3(e).

**Required Action:** The district must ensure that identification meetings are held within 20 days of receipt of referral with required participants in attendance. 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 from meetings conducted between May 2015 and September 2015, and to review the oversight procedures.

**Finding 11:** The district did not consistently conduct all required sections of the functional assessment as a component of an initial evaluation for students referred for special education and related services. Specifically, the district did not conduct observations in other than a testing setting.



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**Citation:** 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 that all components of the functional assessment are conducted as part of the initial evaluation process. 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 initial evaluation reports for students evaluated between May 2015 and September 2015, and to review the oversight procedures.

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 Frank Basso via phone at (609) 984-5909 or via email at [frank.basso@doe.state.nj.us](mailto:frank.basso@doe.state.nj.us) .