



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

CHRIS CHRISTIE  
Governor

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Lt. Governor

DAVID C. HESPE  
Acting Commissioner

May 13, 2014

Ms. Annette Castiglione, Superintendent  
Bellmawr Public Schools  
256 Anderson Avenue  
Bellmawr, NJ 08031

Dear Ms. Castiglione:

The New Jersey Department of Education has completed a review of funds received and disbursed from one or more federal programs by the **Bellmawr 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 March 9, 2014. 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 Bellmawr 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 Joseph Kirchon at (856) 486-2160.

Sincerely,

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

RJC/JK/dk: Bellmawr Cover Letter/consolidated monitoring  
Enclosures

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*New Jersey K-12 Education*

**CONSOLIDATED MONITORING REPORT  
MAY 2014**

**District:** Bellmawr School District  
**County:** Camden  
**Dates On-Site:** March 10 and 11, 2014  
**Case #:** CM-013-13

**FUNDING SOURCES**

Program	Funding Award
Title I	\$ 315,781
IDEA Basic	265,742
IDEA Preschool	11,487
Title IIA	37,752
Title III	14,681
Total Funds	<hr/> <hr/> <b>\$ 645,443</b>

**BELLMAWR SCHOOL DISTRICT  
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**BACKGROUND**

The Elementary & 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, and Race to the Top). 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 Bellmawr 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; IDEA Basic and Preschool and Race to the Top for the period July 1, 2013 through March 9, 2014.

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 that were reviewed included Title I, Title II, Title III, IDEA Basic and Preschool and Race to the Top from July 1, 2013 through March 9, 2014. 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, TITLE II, TITLE III, IDEA  
AND RACE TO THE TOP FUNDS**

**Title I Projects**

The district is using its FY 2013-2014 Title I funds to implement targeted assistance programs in all three of its schools. Primarily, the district provides tutoring services through in-class support. The district has also expended Title I funds for Wilson Reading (Foundations) to supplement the instructional program of its low-performing students.

**Title IIA Projects**

Title II funds were primarily allocated to pay for professional development provided by a third party to help teachers develop stronger skills to work with a literacy building program for K-3 that had been purchased with Title I funds.

**Title III Projects**

The district Title III funds were used for salaries, community participation, supplies, and testing materials.

**IDEA Projects**

IDEA Basic and Preschool funds are being 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.

**Race to the Top**

All Race to the Top funds were spent prior to FY 2012-13.

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**DETAILED FINDINGS AND RECOMMENDATIONS**

**Title I**

**Finding 1:**

**Condition:** The district does not have a parental involvement program that reflects the requirements of the Title I legislation. The district did not have evidence of implementing the following:

- Parent-Teacher-Student compact (missing role of student);
- School-level parental involvement policies; and
- The annual Title I parent meeting.

The exclusion of parents in the development of these documents does not offer them the opportunity for full participation in their child's educational program.

**Citation:** ESEA §1118: *Parental Involvement*.

**Required Action:** The district must ensure its Title I schools have a Parent-Teacher-Student compact and parental involvement policies that are developed with the input of parents and distributed directly to parents of students participating in the Title I program. Additionally, the schools must host their annual Title I meeting early in the school year. The district must submit copies of school-level parental involvement policies, Parent-Teacher-Student compacts and documentation of the annual Title I parent meeting (e.g., meeting notes, sign in sheets, agenda), to the NJDOE for review.

**Finding 2:**

**Condition:** There is no evidence the district's parental involvement policy was reviewed and board adopted for the 2013-2014 school year. The annual review and board adoption of the district/school-level Title I parental involvement policy provides families with the knowledge of the mechanisms the district has available for families to participate in their children's educational program.

**Citation:** ESEA §1118(a)(2): *Parental Involvement (Written Policy)*.

**Required Action:** Copies of a recent board approved district parental involvement policy must be submitted to the NJDOE for review.

**Finding 3:**

**Condition:** The district's parents' web page does not contain the required annual notifications for parental involvement.

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**Citation:** ESEA §1111(h)(2)(E): *Public Dissemination.*

**Required Action:** The district must review and update its parental involvement web page containing required annual notifications and documents to meet the broader ESEA dissemination requirement. The district must submit the link for the updated web page to the NJDOE for review.

**Title IIA**

**Finding 4:**

**Condition:** Teachers assigned to departmentalized Grades 6-8 are not licensed or highly qualified for the assignment. Students receiving direct instruction must be taught by a highly qualified teacher (HQT) in core subjects. Districts must notify parents of students attending Title I schools whether the teacher meets state qualification/licensure requirements. Title I schools must give each parent timely notice when their child has been assigned, or has been taught for four or more consecutive weeks, by a teacher who is not highly qualified. This information is available at: <http://www.ed.gov/legislation/FedRegister/finrule/2002-4/120202a.html>

**Example 1.1:** A teacher holding the Teacher of Elementary School and Teacher of English certificates is assigned to teach 7th grade Social Studies in a departmentalized setting. There is no documentation on file to support the teacher is HQ in Social Studies. A High Objective Uniform Standard of Evaluation (HOUSE) Matrix Form F was presented to accompany the Teacher of English certificate, and the box was checked indicating HQ for Social Studies, but a teacher can't be highly qualified to teach Social Studies under an English certificate. No HQT packet was presented to support the Elementary School Teacher certificate. Review of the transcript failed to substantiate highly qualified status in Social Studies.

**Example 1.2:** A teacher holding the Teacher of Elementary School in Grades K-5 and Teacher of Elementary School with Subject Matter Specialization in Language Arts Literacy certificates is assigned to teach middle grades Social Studies in a departmentalized setting. Previous to the July 2013 New Jersey Administrative Code amendment (governing teacher quality) that expanded the coverage of K-5 certificates to K-6, this teacher would not have been licensed for her current assignment. Today, the teacher is licensed, but not highly qualified. Review of the transcripts presented did not provide evidence of meeting the 30 credit requirement for HQT in Social Studies.

**Example 1.3:** A Teacher of the Handicapped is not an elementary generalist. This teacher is assigned to a general education population for departmentalized instruction in English Language Arts. This teacher is not authorized to teach a general education population under the certificate presented. In addition, The HQT packet on file does not contain Form G. This renders the packet invalid.

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**Citation:** ESEA Part A: *Improving Basic Programs Operated by Local Educational Agencies*; ESEA §1119: *Qualifications for Teachers and Paraprofessionals*; ESEA §2123(A)(5)(B): *Local Use of Funds*; ESEA § 1111(h)(6)(B)(ii) *Right to Know letter*.

**Required action:** HQTID packets were not available for all teachers and not on file in the district office. While individual licenses, score reports, and transcripts may be used to substantiate Highly Qualified Status, failure to assemble the HQTID packet properly makes documentation difficult to review. I recommend that the district review the HQT documentation on file at the time teacher assignments are being made and assure that highly qualified teachers are properly identified with appropriate supporting documentation.

### **Title III**

#### **Finding 5:**

**Condition:** The district had a parental notification letter, but the letter did not outline all of the Title III parental notification requirements. Although the district had 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 following missing elements must be included in the parental notification letter:

- Students' level of English proficiency;
- How such levels were assessed;
- Method of instruction that will be used;
- How the program will meet the needs of the students 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 IEP of a child with a disability.

The exclusion of these components in the notification letter precludes parents from fully understanding the program in which their children are enrolled.

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

**Required Action:** The district's Title III parental notification letter needs to outline the specific requirements for Title III. This information is located at:

<http://www.state.nj.us/education/bilingual/title3/accountability/notification/title3par.htm>.

The district must submit its revised parental notification letter to the NJDOE for review.

#### **Finding 6:**

**Condition:** The district had a parental notification letter, but student specific records are not kept to show that the letters are sent to parents/guardians 30 days after the beginning



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of the school year (or for students who arrive after the beginning of the school year, within two weeks of the child's placement in a language instruction program). A copy of each student's letter should be kept on file to demonstrate that parents/guardians were notified of their child's participation in a language assistance program in a timely manner. Currently, parents may be excluded from receiving information regarding their child's program placement.

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

**Required Action:** The district must ensure that it maintains a copy of each student's parental notification letter on file for all students that enter the district's language assistance program.

**Finding 7:**

**Condition:** The district stated that a High Intensity English as a Second Language program was provided to all students, and that this was a methodologically sound program as determined by their student population. Although some students were seen twice daily, other students were not seen at all on certain days. This practice excludes some students from receiving services that are methodologically equitable.

**Citation:** ESEA 3115(c): *Required Subgrantee Activities.*

**Required Action:** The district must immediately begin the process of implementing methodologically sound services to all students in their language assistance program. To provide a High Intensity ESL program the district must ensure that two periods of daily ESL instruction are provided to students. An amended schedule for ESL teachers that reflects two periods of daily ESL instruction must be provided upon implementation of these services.

**IDEA Special Education**

**Finding 8:**

**Condition:** The district did not consistently conduct multidisciplinary initial evaluations for students referred for special education and related services by having an assessment conducted by at least two members of the child study team. In addition, the district did not conduct all required sections of the functional assessment as a component of initial evaluations for students referred for speech-language services. Specifically, evaluation reports did not consistently include an interview with the child's teacher and a structured observation in other than a testing setting.

**Citation:** N.J.A.C. 6A:14-2.5(b) 6 and 3.6(b) and 6A:14-3.4(f).

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**Required Action:** The district must ensure a multidisciplinary evaluation is conducted for students referred for special education and related services by having at least two members of the child study team conduct assessments. In order to demonstrate correction of noncompliance, the district must conduct training for child study team members and speech-language specialists and develop an oversight mechanism to ensure compliance with the requirements in the citation listed above. A monitor from the NJDOE will conduct an on-site visit to interview staff, review evaluations for students whose eligibility meetings were conducted between June 2014 and October 2014, and to review the oversight procedures.

**Finding 9:**

**Condition:** The district did not provide to students eligible for special education and related services 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 3.7(e)13, 3.7(h); 20 U.S.C. §1414 (d)(1)(A)(i)(1)(VIII); and 34 CFR §300.322.b(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 citation listed above. A monitor from the NJDOE will conduct an on-site visit to interview staff, review copies of student invitations to IEP meetings conducted between June 2014 and October 2014, and to review the oversight procedures.

**Finding 10:**

**Condition:** The district did not consistently document decisions regarding transition to adult life at IEP meetings for students ages 14 and above.

**Citation:** N.J.A.C. 6A:14-2.3(k)2x and 3.7(e)13, 3.7(h); 20 U.S.C. §1414 (d)(1)(A)(i)(1)(VIII); and 34 CFR §300.322.b(2).

**Required Action:** The district must ensure that transition is discussed at each IEP meeting for students age 14 or above, and that decisions are documented in the 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 citation listed above. To demonstrate the district has corrected individual instances of noncompliance, the district must conduct annual review meetings and revise the IEPs of specific students with IEPs identified as noncompliant. A monitor from the NJDOE will conduct an on-site visit to interview staff, review the revised IEPs, a random sample of additional IEPs developed at meetings conducted

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between June 2014 and October 2014, and to review the oversight procedures. The names of students whose IEPs were identified as noncompliant will be provided to the district by the monitor.

**Finding 11:**

**Condition:** 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 include:

- the supplementary aids and services considered, and 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 (in the general education class) may have on the student with disabilities or other students in the class; and
- 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)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 ensure that 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 and develop an oversight mechanism to ensure compliance with the requirements in the citation listed above. 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 interview staff, review the revised IEPs, along with a random sample of additional IEPs developed at meetings conducted between June 2014 and October 2014, and to review the oversight procedures. The names of the students whose IEPs were identified as noncompliant will be provided to the district by the monitor.

**Finding 12:**

**Condition:** The district did not consistently include required considerations and statements in each IEP for students eligible for special education and related services and

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for student eligible for speech-language services. Specifically, IEPs did not consistently include:

- goals and objectives;
- statement of how progress towards annual goals will be measured;
- criteria used to determine achievement;
- factors considered when the IEP team determines that an extended school year program is not warranted; and
- documentation of the provision of related services or speech-language services in either a group or individual setting.

**Citation:** N.J.A.C. 6A:14-3.7 (e) 1-4, and N.J.A.C. 6A:14-3(c); 20 U.S.C. §1414(d)(3)(A)(B); and 34 CFR §300.324(a)(1)(2).

**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 child study team members and speech-language specialists and develop an oversight mechanism to ensure compliance with the requirements in the citation listed above. 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 interview staff, review the revised IEPs, along with a random sample of additional IEPs developed at meetings conducted between June 2014 and October 2014, and to review the oversight procedures. The names of the students whose IEPs were identified as noncompliant will be provided to the district by the monitor. For assistance with correction of noncompliance, the district is referred to the state IEP sample form which is located at: [www.state.nj.us/education/specialed/forms](http://www.state.nj.us/education/specialed/forms).

**Finding 13:**

**Condition:** The district did not consistently convene identification and initial eligibility meetings with required participants for students referred and/or eligible for speech-language services.

**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 obtained prior to the meeting and is maintained in student's records. 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 citation listed above. A monitor from the NJDOE will conduct an on-site visit to interview staff, review documentation,

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including the signed participation page, from meetings conducted between June 2014 and October 2014, and to review the oversight procedures.

**Finding 14:**

**Condition:** The district did not consistently follow appropriate procedures for the identification and referral of student for speech-language services. Upon receipt of a referral from a staff member, the speech-language specialist conducted a screening to determine whether the student should be referred for a speech-language evaluation, rather than conducting an identification meeting. As a result, identification meetings were not held within 20 days of receipt of the referral.

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

**Required Action:** The district must ensure a meeting is conducted within 20 calendar days of receipt of a written request for evaluation to determine if an evaluation is warranted. 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 citation listed above. A monitor from the NJDOE will conduct an on-site visit to interview staff, review documentation from meetings conducted between June 2014 and October 2014, and to review the oversight procedures.

**Race to the Top**

A review of the expenditures charged to the Race to the Top grant yielded no findings.

**Administrative**

**Finding 15:**

**Condition:** The district does not have formal written internal control policies and procedures to prevent contracting with disbarred vendors.

**Citation:** EDGAR, PART 80-*Uniform Administrative Requirements for Grants and Cooperative Agreements to State and Local Governments*, Section 36, Procurement.

**Required Action:** The district must have formal policies and procedures to prevent errors from occurring when contracting with disbarred vendors.

**Finding 16:**

**Condition:** The district does not have formal written internal control policies and procedures for requesting reimbursement from the Electronic Web Enabled Grant or System for Administering Grants Electronically systems.

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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:** The district must have a formal board policy concerning the reimbursement of grant funds.

**Finding 17:**

**Condition:** The district has not provided evidence of competitively contracting for the provision of goods and services by vendors. In accordance with the Public School Contracts Law (PSCL) [N.J.S.A. 18A:18A:10(a)], a board of education may place its order with a vendor offering the lowest price, including delivery charges, that best meets the requirements of the board of education. However, for all federal funds, districts need to review 34 CFR Part 80.36 on procurement requirements. The federal procurement regulations under this section do not include all the exemptions allowed under the PSCL and therefore, these federal regulations require districts to competitively contract or bid all goods and services under the bid threshold, whether exempt under PSCL or not. The federal rules do include provisions for procurement by “noncompetitive proposals,” but only under certain circumstances.

**Citation:** EDGAR, PART 80--*Uniform Administrative Requirements for Grants and Cooperative Agreements to State and Local Governments*, Section 36, Procurement.

**Required Action:** The district should review 34 CFR Part 80.36 and use open and competitive procedures where at all possible. The district should also analyze and include documentation in its files that demonstrates the district ensured the costs were reasonable.

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 Joseph Kirchon via phone at (856) 486-2160 or via email at joseph.kirchon@doe.state.nj.us.