



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

CHRIS CHRISTIE  
Governor

KIM GUADAGNO  
Lt. Governor

DAVID C. HESPE  
Acting Commissioner

May 13, 2014

Dr. Thomasina Jones, Chief School Administrator  
Bridgeton Public Schools  
41 Bank Street  
Bridgeton, NJ 08302

Dear Dr. Jones:

The New Jersey Department of Education has completed a review of funds received and disbursed from one or more federal programs by the **Bridgeton 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 November 15, 2013. 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 Bridgeton 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:Bridgeton Cover Letter/consolidated monitoring  
Enclosures

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

**BRIDGETON BOARD OF EDUCATION**  
41 BANK STREET  
BRIDGETON, NJ 08302  
PHONE: (856) 455-8030



*New Jersey K-12 Education*

**CONSOLIDATED MONITORING REPORT  
MAY 2014**

**District:** Bridgeton Public Schools  
**County:** Cumberland  
**Dates On-Site:** November 18, 19 and 20, 2013  
**Case #:** CM-022-13

**FUNDING SOURCES**

Program	Funding Award
Title I	\$ 2,744,540
IDEA Basic	1,329,531
IDEA Preschool	29,793
Title IIA	420,806
Title III	217,582
Carl D. Perkins	81,049
Total Funds	<u>\$ 4,823,301</u>

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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 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 Bridgeton 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 onsite 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 Carl D. Perkins for the period July 1, 2013 through November 15, 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, 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 Carl D. Perkins from July 1, 2013 through November 15, 2013. 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 IIA, TITLE III,  
IDEA, AND CARL D. PERKINS**

**Title I Projects**

The district used its FY 2012-2013 and FY 2013-2014 Title I, Part A funds to implement schoolwide programs in all of its schools. Primarily, the district provided supplemental instructional opportunities through in-class support (response to intervention), extended day and extended year programs. The district also used Title I funds to support increased use of technology and professional development.

**Title II Projects**

The district used their Title II funds for mathematics coaches, primarily at the Middle School level, and reading specialists to assist teachers in pedagogy related to new practices resulting from the common core implementation. The district reported that they are in the forefront with teacher evaluation and have been using the Danielson model, as well as the McRel Power Walkthrough Strategies prior to the state mandating teacher and principal evaluations. In addition, materials were purchased to support the PLCs and teachers attended out-of-district professional development.

**Title III Projects**

The district has approximately 770 English Language Learners (ELLs). The district uses Title III funds to pay for after school salaries, summer salaries, instructional supplies, interpretation, and technology.

**IDEA Projects**

The majority of the FY 2013-2014 IDEA funds was allocated to reduce district tuition expenditures for students receiving special education services in approved private schools for students with disabilities. In addition funds were allocated on staffing the extended school year program with teachers, aides, therapists, a coordinator and a bus aide.

**Carl D. Perkins Projects**

In FY 2012-13 Bridgeton High School's Perkins grant funds supported the following seven Career and Technical Education (CTE) programs and three programs of study: CAD/CADD Drafting and/or Design Technology/Technician 151302; Radio & Television 090701; Dance, General 500301; Music Technology 500913; Graphic Design 500409; Sales, Distribution, & Marketing Operations, General 521801; Accounting Technology/Technician & Bookkeeping 520302; and programs of study in Business/Office Automation/Technology/Data Entry 520407; Health Services/Allied Health/Health Sciences, General, 510000; and Engineering Technology, General 150000.

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**DETAILED FINDINGS AND RECOMMENDATIONS**

**Title I**

**Finding 1:**

**Condition:** The activities in each school's Schoolwide Plan did not support all of the activities for which the schools are using their Title I funds. In a Title I schoolwide program, the school must use Title I funds and services to upgrade the entire educational program while continuing to provide services to its lowest performing students. The Schoolwide Plan becomes the mechanism for the school to document its efforts to meet the purpose and intent of the Title I legislation, and how the Title I funds will be used to support the program.

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

**Required Action:** The schools must make required changes to the Schoolwide Plans and resubmit them to the Office of Title I for approval. In addition, the Schoolwide Plans must be revised to reflect the current programs being delivered in each school, to include addressing the needs of the full continuum of students (including students with disabilities and gifted and talented students) The school must submit a copy of the revised plans to the NJDOE's Office of Title I for review.

**Title IIA**

**Finding 2:**

**Condition:** The district used Title II funds for curriculum writing which is a necessary part of operating a school and therefore, supplants the use of local funds.

**Citation:** OMB Circular A-87, Attachment B, Section 8(h): *Cost Principles for State, Local and Indian Tribal Governments.* NCLB §1120A(b): *Fiscal Requirements (Federal Funds to Supplement, Not Supplant, Non-Federal Funds).*

**Required Action:** The district must reverse the charges for the expenditure related to "Curriculum Writing" and allocate state/local funds, rather than Title II funds, to support this expenditure. The Title II funds that were misallocated can be re-budgeted for an allowable Title II activity.

**Finding 3:**

**Condition:** The district used Title II funds for professional development activities of the health and Physical Education (PE) teachers. Health and PE are not recognized core academic subjects according to the federal definition.

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**Citation:** ESEA § 9101(11): *Definitions: Core Academic Subjects.*

**Required Action:** The district must reverse the charges for the expenditures related to “*Fitness Education and Student Growth Objectives*” and allocate state/local funds, rather than Title II, funds, to support this expenditure. The Title II funds that were misallocated can be re-budgeted for an allowable Title II activity.

**Finding 4:**

**Condition:** The district’s use of Title II funds for Harassment, Intimidation and Bullying workshops, which are state-mandated activities, supplants state/local funds.

**Citation:** OMB Circular A-87, Attachment B, Section 8(h): *Cost Principles for State, Local and Indian Tribal Governments.* ESEA §1120A(b): *Fiscal Requirements (Federal Funds to Supplement, Not Supplant, Non-Federal Funds).*

**Required Action:** The district must reverse the charges for the expenditure related to “Harassment, Intimidation and Bullying workshops” and allocate state/local funds, rather than Title II funds, to support this expenditure. The Title II funds that were misallocated can be re-budgeted for an allowable Title II activity.

**Title III**

**Finding 5:**

**Condition:** The district had a parental notification letter, but the letter did not outline all of the Title III parent notification requirements. The district had a parental notification letter for students identified for Bilingual/ESL. However, the district did not have a letter for parents that specifically outlined the requirements for Title III. The missing elements that must be included in the parental notification letter are: how proficiency level was assessed, student’s proficiency level, how the program meets state standards, exit requirements, how the instructional program will meet the objectives of an IEP of a child with a disability, and how the methods of bilingual/ESL instruction differ. The district’s failure to issue comprehensive notification letters excludes parents from a complete understanding of the program their children are entering.

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

**Required Action:** The district must revise its Title III parental notification letter to include the statutory requirements. A sample of this letter is located at: <http://www.state.nj.us/education/bilingual/title3/accountability/notification/title3par.htm>. The district must submit a copy of the revised letter to the NJDOE for review.

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**Finding 6:**

**Condition:** The district's use of Title III funds for the salaries of translators/interpreters does not provide supplemental programs/services/activities. The Title III funded translators/interpreters provide core interpretation/translation services required by Title VI of the Civil Rights Act of 1964, which prohibits the district from restricting access to educational programs. In the absence of Title III funds, the district would still have to provide translation/interpretation services. The use of Title III funds for this required services limits the use of the funds for services to identified students..

**Citation:** ESEA §3115(g) *Supplement, Not Supplant.*

**Required Action:** The district must reverse the charges (\$6,626.50 in FY 2013 and \$468 in FY 2014) and allocate state/local funds, rather than Title III funds, to support these expenditures. The nature of this finding has been referred to the Office of Fiscal Accountability and Compliance (OFAC) for further review.

**IDEA Special Education**

**Finding 7:**

**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 consistently include:

- comparison of the benefits provided in the regular class and the benefits provided in the special education class;
- potentially beneficial or harmful effects which a placement (general education) may have on the student with disabilities or the other students in the class;
- for students in separate settings, activities to move the student to a less restrictive environment.

**Citation:** N.J.A.C. 6A:14-4.2 (a) 4 and (a)8(i).(ii) and (iii).

**Required Action:** The district must ensure when determining the education placement of a child with a disability, the IEP team considers the general education class first, and all required decisions regarding the placement are documented in the IEP for each student removed more than 20 percent of the school day. 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 that were identified as noncompliant. At the next IEP meeting for all other students, the IEP team must ensure required considerations are made when determining where services will



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be delivered and document decisions in the IEP. A monitor from 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 January 2014 and April 2014, and to review the oversight procedures. The names of the students with IEPs that were identified as noncompliant will be provided to the district by the monitor.

**Carl D. Perkins**

**Finding 8:**

**Condition:** The district is not offering a coherent sequence of three courses for the Accounting Technology/Technician & Bookkeeping (520302) CTE program.

**Citation:** N.J.A.C. 6A:19-3.1. (a) 6 (i) Program Requirements.

**Required Action:** In the future, the district must ensure that a coherent sequence of three courses is offered for approved CTE programs supported with Perkins funding. The course sequence should consist of those courses identified in the approved program reapproval application. Programs and course sequence information should be available for students, teachers, guidance counselors, administrators and parents.

**Finding 9:**

**Condition:** The district's Cengage Learning MOS Reference Manual was incorrectly assigned to the Health Services/Allied Health/Health Sciences, General 150000 CIP code.

**Citation:** Perkins§135 (a) & (b)1-12 Expenditures correspond to the approved uses specified in the approved application; Circular A-133, Audit Requirements for States, Local Governments and Non-profit Organizations.

**Required Action:** The district must ensure expenditures are charged to the appropriate CIP code in compliance with federal audit requirements.

**Finding 10:**

**Citation:** The district does not have a safety and health plan for hazardous occupations.

**Citation:** N.J.A.C 6A:19-6.5(a).

**Required Action:** All district boards of education and other institutions and agencies operating CTE programs shall organize, adopt, and implement a written CTE safety and health plan describing the safety and health program being used to protect students and staff from safety and health risks on and off-site.

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**Administrative**

**Finding 11:**

**Condition:** On several occasions, the district failed to issue a purchase order prior to goods being purchased or services being rendered (confirming order). District policy and state regulations require that a properly executed purchase order be issued prior to the purchase of goods or the rendering of services.

**Citation:** EDGAR, PART 80-*Uniform Administrative Requirements for Grants and Cooperative Agreements to State and Local Governments*, Section 20, Standards for financial management systems. N.J.S.A. 18A:18A(2)(v) *Public School Contracts Law*.

**Required Action:** The district must update its internal controls to ensure that purchase orders are issued prior to receiving goods and services from vendors and to ensure that payments are only made upon receipt of an invoice containing the required information.

**Finding 12:**

**Condition:** The district does have internal control policies and procedures to prevent contracting with disbarred vendors; however, there was no evidence of implementation.

**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 update its procedures to demonstrate implementation of the internal control policies to prevent errors from potentially occurring.

**Finding 13:**

**Condition:** The district does have formal written policies for requesting reimbursement from the Electronic Web Enabled Grant or System for Administering Grants Electronically systems; however, there are no details regarding the specific process to be followed.

**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 update its procedures to include a description of the specific process will be followed.

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**Finding 14:**

**Condition:** The district lacked, on some occasions, the required supporting documents to verify the activity of contracted staff, as well as those compensated for after school, extended day, summer programs and the like. The documentation must reflect the staff activity, when and where and must match their funded percentage. Also, semi-annual certification for contracted staff, monthly certification for stipend work, and sign in sheets were not properly maintained.

**Citation:** OMB Circular A-87, Attachment B, Section 8(h): *Cost Principles for State, Local and Indian Tribal Governments (Compensation for personal services)*.

**Required Action:** The district must update its internal controls to ensure that staff members who are paid with federal funds are verified, reported properly and timely, and the required documentation is maintained.

**Finding 15:**

**Condition:** The district lacked, on some occasions, the required board minutes information noting the staff paid with federal funds.

**Citation:** OMB Circular A-87, Attachment B, Section 8(h): *Cost Principles for State, Local and Indian Tribal Governments (Compensation for personal services)*.

**Required Action:** The district must update its internal controls to ensure that staff paid are recorded properly.

**Finding 16:**

**Condition:** The district lacked sufficient internal controls to ensure that federal grants were filed completely, accurately and timely.

**Citation:** EDGAR, PART 80.50 - *Uniform Administrative Requirements for Grants and Cooperative Agreements to State and Local Governments*.

**Required Action:** The district must update its internal controls to ensure that federal grants are complete, accurate and on time.

**Finding 17:**

**Condition:** The district lacked sufficient internal controls to ensure that funds were available for federal grants.

**Citation:** EDGAR, PART 80.50 - *Uniform Administrative Requirements for Grants and Cooperative Agreements to State and Local Governments*.

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**Required Action:** The district must update its internal controls to ensure that funds are available for purchases with federal funds.

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](mailto:joseph.kirchon@doe.state.nj.us).