



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

CHRIS CHRISTIE  
Governor

KIM GUADAGNO  
Lt. Governor

DAVID C. HESPE  
Acting Commissioner

May 1, 2014

Mr. Lance Rozsa, Chief School Administrator  
Washington Borough School District  
300 West Stewart Street  
Washington, NJ 07882

Dear Mr. Rozsa:

The New Jersey Department of Education has completed a review of funds received and disbursed from one or more federal programs by the **Washington Borough 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, 2012 through December 31, 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 Washington Borough 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 Steven Hoffmann at (973) 621-2750.

Sincerely,

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

RJC/SH/dk:Washington Boro BOE Cover Letter/consolidated monitoring  
Enclosures

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**STATE OF NEW JERSEY  
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*New Jersey K-12 Education*

**CONSOLIDATED MONITORING REPORT  
MAY 2014**

**District:** Washington Borough School District  
**County:** Warren  
**Dates On-Site:** January 8 and 9, 2014  
**Case #:** CM-057-13

**FUNDING SOURCES**

Program	Funding Award
Title I	\$ 117,205
IDEA Basic	136,958
IDEA Preschool	7,595
Title IIA	19,498
Title III	18,534
Race To The Top	9,360
Total Funds	<hr/> <hr/> \$ 309,150

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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 Washington Borough 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, 2012 through December 31, 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 reviewed included Title I; Title II; Title III; IDEA Basic and Preschool; and Race to the Top from July 1, 2012 through December 31, 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, IDEA AND RACE TO THE TOP FUNDS**

**Title I Projects**

Title I funds were expended to support teacher salaries and benefits.

**IDEA Projects**

The district utilized IDEA 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, the purchase of supplies for the districts preschool disabled classroom, and to support the salary and benefits for the district's preschool disabled teacher.

**Race to the Top**

The district used Race to the Top funds for educator evaluation systems.

**DETAILED FINDINGS AND RECOMMENDATIONS**

**Title I**

**Finding 1:** The district provided time and activity reports for Title I paid teachers that were completed on a quarterly basis instead of a monthly basis as required for split funded staff. This documentation is necessary to verify that funded staff are actually performing allowable grant activities on a consistent basis.

**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 change the frequency of the time and activity reports for staff charged to the Title I grant from quarterly to monthly. The district must submit a list of FY 2013-2014 Title I funded staff along with the appropriate time and activity reports to date to the NJDOE for review.

**Finding 2:** The Title I participation letter to the parents of students in the Title I program did not clearly state the multiple measures used for entrance and exit criteria. Without this information, parents are unable to understand the reasons for their child being selected to participate in the Title I program, and what is needed for their child to exit the program.

**Citation:** ESEA §1115: *Targeted Assistance Program*; ESEA §1118(c): *Parental Involvement (Policy Involvement)*.

**Required Actions:** In its Title I participation letter, the district must include the multiple measures used to identify the students, as well as clearly defined exit criteria. The district

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must provide a copy of its revised FY 2013-2014 Title I participation letter to the NJDOE for review.

**Finding 3:** The district did not provide evidence that educationally related, objective criteria were consistently applied to determine which district students were eligible to receive Title I services. The monitors were unable to verify if the district is actually serving its lowest performing students and that all students receiving services actually met the eligibility criteria.

**Citation:** ESEA §1115: *Targeted Assistance Schools.*

**Required Action:** The district must establish a tracking mechanism for proper Title I student identification. This mechanism must include documentation of which criteria were applied and how the student either met or did not meet the criteria.

**Finding 4:** The district did not have a parental involvement program that reflects the requirements of the Title I legislation and regulations. There is no evidence the district's parental involvement policy was reviewed and board adopted since March 2011 and no evidence that the policy was developed in conjunction with parents. 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.

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

**Required Action:** The district must have a written parental involvement policy evaluated annually with current board adoption. Copies of a recent board approved district parental involvement policy must be submitted to the NJDOE for review. Evidence of the annual review must be documented with meeting agenda, sign in sheets and minutes and should be indicated at the bottom of the document.

**Finding 5:** The district did not provide evidence that the FY 2013-2014 school-parent compact was developed in conjunction with Title I parents. The absence of parent participation in developing these required documents excludes parents from more active participation in their child's educational program.

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

**Required Action:** The district must include the associated stakeholder groups in the development of the school-parent compact. The district must provide evidence of the FY 2013-2014 school-parent compact developed in conjunction with parents of the Title I students to the NJDOE for review.

**Finding 6:** For FY 2013-2014, the district did not provide sufficient evidence of convening an annual Title I parent meeting. Evidence was not provided that the Back-to School and/or Open House nights that occurred fulfilled the legislative requirements. Not conducting an annual meeting to explain the Title I legislation and the district's Title I programs in the beginning of

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the year does not allow parents of identified Title I students 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 must convene its FY 2013-2014 annual Title I meeting for the parents/guardians of its identified Title I students immediately and submit evidence including the invitational letter/flyer, agenda, meeting minutes, and sign in sheets of said meeting to the NJDOE for review. In the future, the annual Title I parent meeting must be held in the beginning of the year no later than mid-October.

**Finding 7:** The district's "Parental Resources" and "Title I" web pages were missing the Title I district parental involvement policy (#2415.04) and the school-level parental involvement policies. In addition, the Parents' Right-to-Know Highly Qualified Teacher (HQT) letter was outdated.

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

**Required Action:** The district must review and update the website to reflect the current versions of the district parental involvement policy, school-level parental involvement policies and Parents' Right-to-Know HQT letter.

**Finding 8:** The district did not contact nonpublic schools outside the district to accurately account for all district students attending nonpublic schools and for nonpublic low-income counts. Due to the inaccurate total nonpublic enrollment, lack of documentation to substantiate the number of low-income nonpublic students, and the exclusion of nonpublic schools outside the district, the monitors could not verify that eligible resident nonpublic students were afforded the opportunity to participate in the Title I program.

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

**Required Action:** The district must immediately contact nonpublic schools within a 50 mile radius of the district for enrollment and low-income figures. In the future, no later than May of each school year, the district must contact the nonpublic schools that enroll resident students to inform the schools of their opportunity to participate in the district's Title I program for the upcoming school year. After contacting nonpublic schools that enroll resident students, the district must then begin the consultation process with the nonpublic schools to identify eligible students and develop a service delivery plan. The district must revise its FY 2013-2014 NCLB Consolidated Application to accurately reflect both the number of resident nonpublic school students and the number of low-income resident nonpublic school students. The district must send documentation of the consultation process (e.g., invitational letters, agendas, meeting notes, sign in sheets) to the NJDOE for review.

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**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.

**IDEA (Special Education)**

**Finding 9:** Contracts for the 2012-2013 and 2013-2014 grant years with service providers such as consultants, agencies and physicians do not contain a not to exceed amount.

**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 ensure all contracts with consultants, agencies, and physicians include a not to exceed amount.

**Finding 10:** The district did not consistently ensure the required participants were in attendance at identification, eligibility, and IEP meetings for students eligible for special education and related services and for students eligible for speech-language services.

**Citation:** N.J.A.C. 6A:14-2.3(k); 20 U.S.C. §1414(d)(1)(B); and 34 CFR §300.321(a).

**Required Action:** The district must ensure identification, eligibility and IEP meetings are conducted with required participants and that documentation of attendance and/or written parental consent to excuse a member of the team is maintained in student's records. 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 citations listed above. A monitor from the NJDOE will conduct an on-site visit to interview staff, review documentation of meetings, including sign in sheets, conducted between May 2014 and September 2014, and to review the oversight procedures.

**Finding 11:** The district did not consistently provide copies of evaluation reports to parents at least 10 days prior to the determination of eligibility for students referred and/or eligible for special education and related services and for students referred and/or eligible for speech-language services.

**Citation:** N.J.A.C. 6A:14-3.5(a); 20 U.S.C. §1414(b)(4); and 34 CFR §300.306(a).

**Required Action:** The district must ensure parents are provided copies of evaluation reports not less than 10 days prior to the meeting to determine eligibility. In order to



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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 citations listed above. A monitor from the NJDOE will conduct an on-site visit to interview staff, review documentation of the provision of copies of evaluation reports provided to parents to eligibility meetings conducted between May 2014 and September 2014, and to review the oversight procedures.

**Finding 12:** The district did not consistently provide notice of a meeting for eligibility and IEP team meetings to parents of students referred and/or eligible for speech-language services.

**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 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 copies of notices provided to parents for meetings conducted between May 2014 and September 2014, and to review the oversight procedures.

**Finding 13:** The district did not consistently document all required considerations and statements in each IEP for students eligible for speech-language services. IEPs did not consistently include:

- documentation of the strengths of the student;
- other academic and functional needs that result from the student's disability;
- language, communication, deaf/hard of hearing, assistive technology needs; and
- a statement of how progress towards annual goals will be measured.

**Citation:** N.J.A.C. 6A:14-3.7(c)1-11, (e) 1-17, and (f); 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 speech-language specialists and develop an oversight mechanism to ensure compliance with the requirements in the citation listed above. To correct the individual instances of noncompliance, the district must conduct annual review meetings and revise IEPs for the 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 May 2014 and September 2014, 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.statenj.us/education/specialed/forms](http://www.statenj.us/education/specialed/forms).

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**Finding 14:** The district did not consistently conduct multidisciplinary 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 citation 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 May 2014 and September 2014, and to review the oversight procedures.

**Finding 15:** The district did not consistently document consideration of placement in the least restrictive environment 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. Specifically, IEPs did not consistently include:

- the supplementary aids and services considered;
- an explanation of why the supplementary aids and services were rejected;
- the potentially beneficial or harmful effects which a placement in general education may have on the students with disabilities or other students in the class; and
- for students in a separate setting, activities to move 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 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 regarding the district's procedures and develop an oversight mechanism to ensure compliance with the requirements in the citations 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 May 2014 and September 2014, and to review the oversight procedures. The names of the

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students whose IEPs were identified as noncompliant will be provided to the district by the monitor.

**Race to the Top**

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

**Administrative**

There were no administrative findings.

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](mailto:steven.hoffmann@doe.state.nj.us).