



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

May 10, 2016

Mr. Dennis Anderson, Interim Superintendent  
Woodbine School District  
801 Webster Street  
Woodbine, NJ 08270

Dear Mr. Anderson:

The New Jersey Department of Education has completed a review of funds received and disbursed from one or more federal programs by the **Woodbine School District**. 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, 2014 through April 12, 2016. 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 [www.state.nj.us/education/compliance/monitor/](http://www.state.nj.us/education/compliance/monitor/).

Utilizing the process outlined in the attached "Procedures for LEA/Agency Response, Corrective Action Plan and Appeal Process," the Woodbine School District 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 Carla Spates at (609) 984-5909.

Sincerely,

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

RJC/CS/dk:Woodbine School District Cover Letter /consolidated monitoring 15-16  
Enclosures

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**WOODBINE SCHOOL DISTRICT  
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*New Jersey K-12 Education*

**CONSOLIDATED MONITORING REPORT  
APRIL 2016**

**District:** Woodbine School District  
**County:** Cape May  
**Dates On-Site:** April 11 and 12, 2016  
**Case #:** CM -016-15

**FUNDING SOURCES**

Program	Funding Award
Title I, Part A	\$ 202,609
Title II, Part A	47,161
IDEA Basic	88,627
IDEA Preschool	841
	<hr/>
Total Funds	<u>\$ 339,238</u>

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**BACKGROUND**

The Elementary and Secondary Education Act (ESEA) and the Individuals with Disabilities Act (IDEA) and other federal laws require local education agencies (LEAs) to provide programs and services to their districts based on the requirements specified in each of the authorizing statutes (ESEA, IDEA, Race to the Top, and Carl D. Perkins). The laws further require 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 Woodbine School District to monitor the district's use of federal funds and the related program plans, where applicable, to determine whether the schools' 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); IDEA Basic and Preschool for the period July 1, 2014 through April 12, 2016.

The scope of work performed included the review of documentation including grant applications, program plans and needs assessments, grant awards, annual audits, board minutes, payroll records, accounting records, purchase orders, a review of student records, classroom visitations and interviews with instructional staff to verify implementation of Individualized Education Programs (IEP), a review of student class and related service schedules, interviews of child study team members and speech language specialists and an interview of the program administrator regarding the IDEA grant, as well as current district policies and procedures. The monitoring team members also conducted interviews with school 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, IDEA Basic, and Preschool from July 1, 2014 through April 12, 2016. 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 AND TITLE II AND IDEA FUNDS**

**Title I**

The district is using its FY 2015-2016 funds to implement a schoolwide program. Primarily, the district provides supplemental instructional opportunities through extended day and extended year programs.

**Title II**

The district is using its FY 2015-2016 Title II funds to provide additional professional development to support teaching strategies to close the achievement gap in language arts literacy.

**IDEA (Special Education)**

The district is using its FY 2015-2016 IDEA funds to contract child study team services. A review of the IDEA programs and fiscal expenditures yielded no findings.

**DETAILED FINDINGS AND RECOMMENDATIONS**

**Title I**

**Finding 1:** The district's Title I school held its annual Title I meeting on March 21, 2016. Not conducting an annual meeting in the beginning of the year to explain the Title I legislation and the district's Title I programs did not allow parents to be informed and vested in the Title I process from the start.

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

**Required Actions: Required Action:** The school must convene the FY 2016-2017 annual Title I meeting no later than mid-October. The district must submit evidence of convening this meeting to the NJDOE for review (e.g., invitational letter/flyer, agenda, meeting minutes, and sign in sheet).

**Finding 2:** There was no evidence that the district parental involvement policy was reviewed for the current school year. 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 Title I parents.

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

**Required Action:** The district must submit copies of a recent board approved district parental involvement policy to the NJDOE for review. The district must also provide evidence of inclusion of the associated stakeholder groups in the development of the parental

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involvement policy, and evidence of the involvement of parents and families in the development and annual review process. The district must provide evidence to the NJDOE that during the 2015-2016 school year these documents were developed with the input of the parents/guardians of Title I students.

**Finding 3:** The district did not have the required supporting documents to verify the activity of staff charged to the Title I grant. The documentation must reflect what the staff is doing and when (time slots), and must match their funded percentage. This documentation is necessary to ensure that grant funded staff are actually performing grant-related responsibilities. However, the district had alternative documentation that helped support the funding.

**Citation:** 2 CFR §200.430: Compensation-personal services.

**Required Action:** The district must identify staff members whose salaries are supported in whole or in part with Title I funds and verify the time and activity of staff charged to the grant. The district must submit sample sheets for the 2015-2016 school year to the NJDOE for review. The district was provided a sample for use.

**Finding 4:** The district did not submit a completed FY 2015-2016 Schoolwide Plan. The section about expenditures was left blank in the submitted plan. 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:** For FY 2016-2017 the district must be sure to complete the entire Schoolwide Plan as all information is required for the plan to meet all the standards, or revert to operating a targeted assistance program.

## **Title II**

**Finding 5:** The district/school did not have a district-based professional development plan for the 2015-2016 school year. All schools and districts in New Jersey are required to create an annual district professional development plan and all schools are required to create annual school-level professional development plans. The district-level and school-level plans must align with New Jersey's definition of Professional Development and Professional Development Standards for Teachers and the New Jersey Standards for Professional learning.

**Citations:** ESEA §2122: *Local Applications and Needs Assessment*; N.J.A.C. 6A:9C-4.2: District – and school–level plans for professional development implementation; and N.J.A.C. 6A:9C-5.3: District monitoring plan.

**Required Action:** The district must create a professional development plan that is consistent with professional development funded activities. The district must submit a professional

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development plan for the 2016-2017 school year along with board approval to the NJDOE for review.

**Finding 6:** The district issued purchase orders for professional services without competitive contracting.

**Citation:** 2 CFR §§200.318: General procurement standards, 200.319: Competition, 200.320: Methods of procurement to be followed; and N.J.S.A. 18A:18A-10(c): Public School Contracts Law.

**Required Action:** The district should review applicable regulations and use open and competitive procedures as required. The district should also analyze and include documentation in its files that demonstrates the district ensured the costs were reasonable.

**Finding 7:** Employee reimbursement of travel costs was incorrectly recorded to the general ledger account number containing a line item designated for other purchased services (200-500) instead of the line item designated for travel (200-580).

**Citation:** N.J.A.C. 6A:23A-16.2: Double-Entry Bookkeeping and GAAP Accounting (Principles and directives for accounting and reporting).

**Required Action:** The district must charge expenditures to the general ledger account numbers with proper line item codes. The district should review its funded expenditures for FY 2015-2016 and transfer all improperly recorded transactions to the appropriate accounts prior to submitting its FY 2015-2016 Final Report.

**IDEA**

**Finding 8:** The district does not offer a full-continuum of placement options for students determined eligible for special education and related services. The district currently offers pull-out resource and self-contained services for Grades 1 through 8. Students in preschool and kindergarten receive only related services and support of a classroom aide or one to one aide. Students with disabilities in general education classroom settings have the opportunity for aide support, but in-class resource is not an option.

**Citation:** N.J.A.C. 6A:14-4.2; 20 USC 1412(a) (5)(A) and 34 CFR §300.114(a).

**Required Action:** The district must ensure all students who are eligible for special and related services have the opportunity to participate in programs and services based on their individual needs in the least restrictive environment (LRE). The district must also ensure decisions regarding program placement are made on an individual basis. The district must develop a procedure to ensure placement in the LRE and individual decision making regarding program placement and provide training to child study team members and administrative staff on the newly developed procedures. A monitor from the NJDOE will

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conduct an on-site visit to interview staff, review the developed procedures, evidence of required training, and documentation of program placement decisions.

**Finding 9:** The district did not consistently, document all required considerations and statements in each IEP. IEPs for students eligible for special education and related services did not include age 14 post-school transition components, specifically needed interagency linkages.

**Citation:** N.J.A.C. 6A: 14-4 3.7(e) 11.

**Required Action:** The district must ensure that each IEP contains all required components. In order to demonstrate correction of noncompliance, the district must conduct training for child study team members and develop an oversight mechanism to ensure compliance with the requirements in the citation listed above. To demonstrate 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 IEPs developed at meetings conducted between September 2016 and December 2016, 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 10:** The district did not consistently document in the IEPs of students removed from the general education setting for more than 20 percent of the day, including students placed in separate settings, consideration of placement in the LRE. Specifically, IEPs did not consistently include;

- the supplementary aids and services considered;
- 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 (general education) may have on the student with disabilities or the other students in the class; and
- for 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) and N.J.A.C. 6A:14-4.2 (a)4.

**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 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 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



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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, a random sample of additional IEPs developed at meetings conducted between September 2016 and December 2016, 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 11:** The district did not provide interventions in general education setting(s) to students exhibiting academic difficulties. General education students exhibiting academic difficulties are placed in special education settings as an intervention, rather than referring a student to the Intervention and Referral Services (I&RS) team or child study team.

**Citation:** N.J.A.C. 6A:14-3.3(d) and N.J.A.C. 6A: 4.6(d); 4.7(a).

**Required Action:** The district must ensure students exhibiting academic difficulties are referred through the proper procedures, either to the I&RS for interventions in general education or the child study team to determine if an evaluation is warranted. Only students determined eligible for special education and related services who have a current individual education program may be placed in special education classrooms. In addition, school personnel may make a direct referral to child study team to determine whether an evaluation is warranted. In order to demonstrate correction of noncompliance, the district must conduct training for administrative staff and 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 child study team referrals received between September 2016 and December 2016, and to review the oversight procedures.

**Finding 12:** The district did not consistently conduct multidisciplinary initial evaluations for students referred for speech-language services by obtaining an educational impact statement from the classroom teacher.

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

**Required Action:** The district must ensure a multidisciplinary evaluation is conducted for students referred for speech-language services by obtaining a 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 whose completed between September 2016 and December 2016, and to review the oversight procedures.

**Finding 13:** The district did not consistently conduct all required sections of the functional assessment as a component of an initial evaluation for students referred for speech-language

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services. Specifically, evaluation reports did not contain observation of the students in other than a testing setting, parent interview and review of developmental history.

**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 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 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 completed between September 2016 and December 2016, and to review the oversight procedures. For assistance with correction of noncompliance, the district is referred to the sample report form for speech-language evaluations which is located at: [www.state.nj.us/education/speced/forms](http://www.state.nj.us/education/speced/forms).

**Administrative**

**Finding 14:** On several occasions, the school failed to issue a purchase order prior to goods being purchased or services being rendered (confirming order). School policy and state regulations require a properly executed purchase order be issued prior to the purchase of goods or the rendering of services.

**Citation:** 2 CFR 200.302: Financial management. N.J.S.A. 18A:18A-2(v) Public School Contracts Law.

**Required Action:** Purchase orders should be issued to all vendors prior to goods or services being provided.

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 Carla Spates via phone at (609) 984-5909 or via email at [carla.spates@doe.state.nj.us](mailto:carla.spates@doe.state.nj.us).