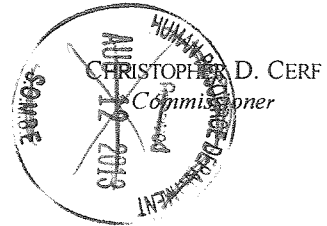


State of New Jersey  
DEPARTMENT OF EDUCATION  
PO BOX 500  
TRENTON, NJ 08625-0500

CHRIS CHRISTIE  
Governor

KIM GUADAGNO  
Lt. Governor



August 7, 2013

Dr. Brian Osborne, Superintendent  
South Orange-Maplewood Board of Education  
525 Academy Street  
Maplewood, NJ 07040

Dear Dr. Osborne:

The New Jersey Department of Education has completed a review of funds received and disbursed from one or more federal programs by the **South Orange-Maplewood 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, 2011 through February 28, 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 South Orange-Maplewood 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:South Orange-Maplewood BOE Cover Letter/consolidated monitoring  
Enclosures

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*New Jersey K-12 Education*

CONSOLIDATED MONITORING REPORT  
AUGUST 2013

**District:** South Orange-Maplewood School District  
**County:** Essex  
**Dates On-Site:** March 25, 26 and 27, 2013  
**Case #:** CM-050-12

**FUNDING SOURCES**

Program	Funding Award
Title I	\$ 513,962
IDEA Basic	1,473,422
IDEA Preschool	40,997
Title IIA	164,786
Title III	29,592
Carl D. Perkins	37,213
Total Funds	<u>\$ 2,259,972</u>

**SOUTH ORANGE-MAPLEWOOD SCHOOL DISTRICT  
CONSOLIDATED MONITORING REPORT  
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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 and IDEA). 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 South Orange-Maplewood 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 II, Part A; Title III; IDEA Basic and Preschool; and the Carl D. Perkins grant for the period July 1, 2011 through February 28, 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, Part A; Title II, Part A; Title III, IDEA Basic and Preschool, and the Carl D. Perkins grant from July 1, 2011 through February 28, 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 CARL D. PERKINS FUNDS**

**Title I Projects**

Title I funds were used to support teacher salaries and benefits, supplies, and professional development.

**IDEA Projects (Special Education)**

FY 2012 IDEA Basic funds were used to reduce district tuition expenditures for students receiving special educational services in approved private schools for students with disabilities. The IDEA preschool funds were used for the purchase of instructional supplies for students in the preschool special education program. The nonpublic proportionate share of the grant is being used for instructional supplies and equipment, as well as to provide supplemental instruction and related services through a vendor, Essex Regional Educational Service Commission (ERESC), for students with disabilities attending nonpublic schools.

**Carl D. Perkins**

Perkins funds were used for supplies and equipment to support one approved Career and Technical Education program of study in Radio and Television Production (090701).

**DETAILED FINDINGS AND RECOMMENDATIONS**

**Title I**

**Finding 1:**

**Condition:** The district does not have supporting documents to verify the activity of Title I teachers as required by federal law. The documentation must reflect what the staff is doing, when and where and it must match their funded percentage. This documentation is necessary to verify that funded staff are actually performing allowable grant activities.

**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 verify the time and activity of staff charged to the grant. The district must submit a list of FY 2012-2013 Title I funded staff, salaries, funding percentages and time sheets to date to the NJDOE for review.

**Finding 2:**

**Condition:** The district did not provide evidence that multiple measures were consistently applied to determine which students were eligible to receive Title I services.

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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. The district must submit documentation of its tracking system to the NJDOE for review.

**Finding 3:**

**Condition:** The district's use of Title I funds to operate READ 180 as a replacement language arts literacy program for identified Title I students supplants state and local funds. The district must use its state/local funds to provide core courses that are required under the district's curriculum. The district may not use state/local funds for non-Title I students to assess a core course and federal funds for Title I students to assess the same core course.

**Citation:** NCLB §1115(c) *Targeted Assistance Programs, Components of a Targeted Assistance Program*; USDE Policy letter October 6, 2008.

**Required Action:** The district must revise its Title I program to provide services to Title I students in language arts that are in addition to the core curriculum requirement and above and beyond services provided to non-Title I students. The district must reverse the FY 2012-2013 Title I expenditures for READ 180 and allocate state/local funds for the expenditure. The district must submit evidence of the journal entry to reverse the expenditure and a narrative describing its revised Title I program to the NJDOE for review.

**Finding 4:**

**Condition:** The district's use of Title I funds for the academic interventionists to provide in-class support and/or pull-out programs to non-Title I students in both Title I and non-Title I schools supplants state and local funds. As such, Title I students are not receiving additional services.

**Citation:** ESEA §1120A(b): *Fiscal Requirements (Federal Funds to Supplement, Not Supplant, Non-Federal Funds)*.

**Required Action:** The district must reverse these charges and allocate state/local funds, rather than using Title I funds to support these expenditures. The district must provide evidence of the journal entry to reverse the expenditures to the NJDOE for review.

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**Finding 5:**

**Condition:** The district did not provide consistent evidence of convening the annual Title I parent meeting. Evidence was not provided that the Back-to-School 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 does not allow parents of identified Title I students to be informed and vested in the Title I process.

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

**Required Actions:** The district must convene its FY 2013-2014 annual Title I meeting for the parents/guardians of its identified Title I students in the beginning of the year and submit evidence of said meeting to the NJDOE for review (invitational letter/flyer, agenda, meeting minutes, and sign in sheets must be obtained).

**Finding 6:**

**Condition:** The district did not provide evidence that for FY 2012-2013 the Parents' Right-to-Know letter was sent to parents in the Title I schools. The Parents' Right-to-Know letter informs all parents in those schools of their right to ask about the qualifications of their child's teachers.

**Citation:** ESEA §1111(h)(6): *State Plans: Reports (Parents Right-to-Know)*.

**Required Action:** At the beginning of the 2013-2014 school year, the district must distribute the Highly Qualified Teacher (HQT) letter to the parents of all students who attend Title I schools. A template of the HQT letter can be found at: <http://www.state.nj.us/education/title1/hqs/rtk.htm>. The district must submit a copy of the 2013-2014 HQT letter to the NJDOE for review prior to distributing the letter.

**Finding 7:**

**Condition:** The district does not have a parental involvement program that reflects the requirements of Title I. In FY 2012-2013, there is no evidence that the district's parental involvement policy was reviewed and board adopted since April 2007, and that school-level parental involvement policies were developed. The annual review and current board adoption plus the school-level policies 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)*; ESEA §1118(b): *Parental Involvement (School Parental Involvement Policy)*.

**Required Action:** The district must have both a written district parental involvement policy evaluated annually and school-level parental involvement policies. The district should provide technical assistance to its schools in the development of school-level

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parental involvement policies and ensure its schools work with their stakeholder groups to develop the policies. Copies of a recent board approved district parental involvement policy and school-level policies must be submitted to the NJDOE for review.

**Finding 8:**

**Condition:** The district included nonpublic enrollment and poverty numbers on the FY 2012-2013 ESEA Application in Step One of the Title I, Part A eligibility tab that generated \$2,337 for nonpublic services. In the application, the \$2,337 was budgeted for Study Island program access. The district could not provide documentation it contacted or consulted with the nonpublic schools to determine either refusal of funds or consultation for Title I services that meet the needs of the nonpublic students based on academic criteria.

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

**Required Action:** The district must identify which nonpublic schools the low-income students reflected in the FY 2012-2013 ESEA Consolidated Application attend. The district must reach out to those nonpublic schools and document either refusal of funds or must then begin the consultation process with the nonpublic schools to identify eligible Title I students and develop a service delivery plan. The district must send documentation of the refusal form(s) or the consultation process (e.g., invitational letters, agendas, meeting notes, sign in sheets) to the NJDOE for review.

**Finding 9:**

**Condition:** For FY 2012-2013, the South Orange-Maplewood Middle School was skipped; therefore, it is not designated as a Title I served school. As such, the associated salary and professional development (\$7,615) budgeted for this school cannot be paid for with Title I, Part A funds and must be paid for with state/local funds.

**Citation:** ESEA §1120A(b): *Fiscal Requirements (Federal Funds to Supplement, Not Supplant, Non-Federal Funds).*

**Required Action:** The district must reverse these charges and allocate state/local funds, rather than using Title I funds to support these expenditures. The district must provide evidence of the journal entry to reverse the expenditures to the NJDOE for review.

Note: If the district used Title I funds to provide the same professional development to teachers in Title I schools, the district violated the supplement not supplant provision, and will be required to return the Title I funds to the NJDOE. This matter is being referred to the Department's Office of Fiscal Accountability and Compliance for further review.

**Title IIA**

A review of the expenditures charged to Title IIA grant yielded no findings.

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**Title III**

A review of the expenditures charged to Title III grant yielded no findings.

**IDEA (Special Education)**

**Finding 10:**

**Condition:** The district's FY 2011-2012 and FY 2012-2013 contract with the ERESK for services to nonpublic students with disabilities is based on the total amount of IDEA funding received by the district. The contract should be based on the type and quantity of services to be provided to students in nonpublic schools.

**Citation:** N.J.A.C. 6A:14-6.3; 20 U.S.C. §1412(a)(10)(A)(vii); 34 CFR §300.130-144.

**Required Action:** The district must revise the current contract with the ERESK to include the type of services provided and associated rates. Additionally, the district should request detailed invoices from the ERESK that include specific dates of service and type of service provided. The district must implement an oversight mechanism to ensure contracts support the specific services provided to students in nonpublic schools. A monitor from the NJDOE will conduct an on-site visit to review the revised contract.

**Finding 11:**

**Condition:** The district is not providing the services indicated in Individual Service Plans (ISPs) for students with disabilities in nonpublic settings. In some ISPs, the program page indicates that a classroom paraprofessional and/or a one-to-one assistant will be provided in all general education classes. However, the district is not providing this service.

**Citation:** N.J.A.C. 6A:14-6.2; 20 U.S.C. §1412(a)(10)(A)(vi); 34 CFR §300.130-144; Chapter 192 & 193 Programs for Nonpublic School Students 2011-2012.

**Required Action:** All ISPs must be revised, through a properly configured meeting, to reflect the appropriate level of service being provided in the nonpublic school or the district must begin providing the services of a paraprofessional or one-to-one assistant, where indicated. The district must implement an oversight mechanism to ensure services are documented in ISPs are provided. A monitor from the NJDOE will conduct an on-site visit to review revised ISPs and conduct classroom visits at nonpublic schools.

**Special Education Programs**

**Finding 12:**

**Condition:** The district did not consistently provide notice of a meeting, with all required components, to parents of students referred and/or eligible for special education and

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related services and students referred and/or eligible for speech-language services. Specifically, the notices did not include the purpose of the meeting and the participants invited to the meeting.

**Citation:** N.J.A.C. 6A:14-2.3(k); 20 U.S.C. §1414(b)(1); and 34 CFR §300.304(a).

**Required Action:** The district must provide parents notice of a meeting that contains all required components, early enough to ensure the parent has an opportunity to attend. 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 monitor compliance with the requirements in the citation listed above. A monitor from the NJDOE will conduct an on-site visit to interview staff, review notices of meetings conducted between August 2013 and December 2013 and the oversight procedures.

**Finding 13:**

**Condition:** The district did not consistently obtain written parental consent to conduct an initial evaluation for students referred for speech-language services.

**Citation:** N.J.A.C. 6A:14-2.3(a); 20 U.S.C. §1414(a)(1)(D); and 34 CFR §300.300(a).

**Required Action:** The district must ensure informed parental consent is obtained before conducting initial evaluations. 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 citations listed above. A monitor from the NJDOE will conduct an on-site visit to interview staff, review written parental consent to conduct an initial evaluation for students referred for speech-language services between August 2013 and December 2013 and review the oversight procedures.

**Finding 14:**

**Condition:** The district did not consistently provide copies of evaluation report to parents at least 10 days prior to the eligibility meeting.

**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 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 evidence of provision of evaluation reports to parents for students evaluated between August 2013 and December 2013 and review the oversight procedures.

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**Finding 15:**

**Condition:** The district did not provide to students eligible for special education and related services a summary of academic achievement and functional performance prior to graduation.

**Citation:** N.J.A.C. 6A:14-4.11(b)4; 20 U.S.C. §1414(c)(5)(B)(ii); and 34 CFR §300.305(e)(3).

**Required Action:** The district must ensure parents or adult students are provided with a summary of each student's academic achievement and functional performance and written notice prior to graduation. 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 review files of students with disabilities who graduated or exceeded the age of eligibility as of August 2013.

**Finding 16:**

**Condition:** The district did not consistently convene IEP team meetings: Identification, initial eligibility/IEP, reevaluation and re-determination of eligibility meetings with required participants 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:14-2.3(k); 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 students' 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 citation listed above. A monitor from the NJDOE will conduct an on-site visit to interview staff, review documentation for meetings conducted between August 2013 and December 2013 and review the oversight procedures.

**Finding 17:**

**Condition:** The district did not consistently document the following 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:

- the supplementary aids and services considered, and/or an explanation of why they were rejected;

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- a comparison of the benefits provided in the regular class and the benefits provided in the special education 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, 3.7(k) ; 20 U.S.C. §1412(a)(5); 34 CFR §300.114.

**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, that the IEP team identifies activities to transition the student to a less restrictive environment and documents 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 IEP meetings and revise the IEPs for specific students with IEPs that were identified as noncompliant. For all other students removed from the general education setting for more than 20 percent of the day, the district must document consideration of placement in the least restrictive environment at the next annual review meeting. A monitor from the NJDOE will conduct an on-site visit to interview staff, review revised IEPs, review the IEPs for students whose annual review meetings were conducted between August 2013 and December 2013 and review the oversight procedures.

**Finding 18:**

**Condition:** The district did not consistently include required considerations and statements in each IEP for students eligible for special education and related services and for students eligible for speech-language services. Specifically, IEPs did not consistently document:

- a statement of how the student's disability affects his or her involvement and progress in general curriculum;
- strengths of the students (in area of communication);
- results of initial or most recent evaluations;
- goals and objectives for students who are included in general education;
- supports for school personnel;
- transfer of rights/age of majority;
- participation in statewide and district wide assessments, including a statement of the modifications and accommodations to be provided during the assessment; and
- consideration of the need for extended school year, and a description of the program when it will be provided.

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**Citation:** N.J.A.C. 6A:14-3.7(c), (e), and (f); 20 U.S.C. §1414(d)(3)(A)(B), 1412(a)(16)(A); and 34 CFR §300.160(a) and (f), 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 citations listed above. In addition, the district must conduct a meeting of the IEP team to revise the IEPs for the specific students whose IEPs were identified as noncompliant during the monitoring. For all other students, the district must ensure IEPs developed at the next annual review meeting contain all required considerations and statements. A monitor from the NJDOE will conduct an on-site visit to interview staff and review the revised IEPs, IEPs developed for students whose meetings were held between August 2013 and December 2013 and the oversight procedures. Names of the students whose IEPs were determined 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: <http://www.state.nj.us/education/specialed/form/>.

**Finding 19:**

**Condition:** The district did not consistently provide interventions in general education settings to students exhibiting academic and/or behavioral difficulties prior to referring the student for an evaluation. Additionally, when interventions were provided in general education through the Intervention and Referral Services Team (I&RS) the district did not maintain documentation of the description, frequency, duration and effectiveness of the interventions provided.

**Citation:** N.J.A.C. 6A:14-3.3(b), (c).

**Required Action:** The district must ensure interventions are provided in the general education setting for students exhibiting academic and or behavioral difficulties prior to referring the student for an evaluation. In addition, the district must ensure that when the I&RS team identifies interventions to meet the needs of a struggling learner, that the team identifies and maintains documentation of the description, frequency, duration, and effectiveness of the interventions provided. In order to demonstrate correction of noncompliance, the district must conduct training for administrators and the I&RS team members and develop an oversight mechanism to ensure compliance with the requirements in the citations listed above. A monitor from the NJDOE will conduct an on-site visit to interview staff, review documentation for students who were referred to the child study team between September 2013 and December 2013 and review the oversight procedures.

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**Finding 20:**

**Condition:** The district did not conduct a meeting within 20 calendar days of receipt of a written request for evaluation for special education and related services. Additionally, the district delayed conducting a meeting for preschool age students by requiring parents to register the student prior to conducting the identification meeting.

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

**Required Action:** The district must ensure identification meetings are conducted within 20 calendar days of receipt of a written request for evaluation and required participants are in attendance. 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 the dated initial request for evaluation for students referred for special education and related services and for students referred for speech-language services, the signed participation pages from the resulting meetings conducted between August 2013 and December 2013 and the oversight procedures.

**Finding 21:**

**Condition:** The district did not conduct vision/hearing screenings and health/medical summaries for students who were directly referred to the child study team for evaluation. Noncompliance was due to a lack of implementation of district procedures.

**Citation:** N.J.A.C. 6A:14-3.4(j), 3.3(g), (h).

**Required Action:** The district must ensure a vision and audiometric screening is conducted for every student referred to the child study team with a copy of the results maintained in students' files, along with available health/medical summaries. In order to demonstrate correction of noncompliance, the district must conduct training for child study team members and develop an oversight mechanism to ensure compliance with the requirements in the citations listed above. A monitor from the NJDOE will conduct an on-site visit to interview staff, review documentation verifying receipt of the health summary, including the vision and hearing screening, for students referred to the child study team between August 2013 and December 2013 and the oversight procedures.

**Finding 22:**

**Condition:** 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).

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**Required Action:** The district must ensure a multidisciplinary evaluation is conducted for speech-language services by obtaining a statement from the general education teacher that indicates the educational impact of the speech problem on the student's progress in the general education setting. 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 speech-language evaluations for students whose meetings were conducted between August 2013 and December 2013 and review the oversight procedures.

**Finding 23:**

**Condition:** The district did not consistently conduct all required sections of the functional assessment as a component of initial evaluations. Specifically, the initial evaluation reports did not include:

- an observation of the student in other than a testing setting;
- review of prior interventions;
- review of developmental/educational history; and
- teacher interview.

**Citation:** N.J.A.C. 6A:14-3.4(f)4; 20 U.S.C. §1414(b)(1)-(3); and 34 CFR §300.304.

**Required Action:** The district must ensure all components of a functional assessment are conducted as part of an initial evaluation. 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 initial evaluation reports for students whose eligibility meetings were held between August 2013 and December 2013 and 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: <http://www.state.nj.us/education/specialed/form/>.

**Finding 24:**

**Condition:** The district did not ensure child study team participation at the planning conference of students transitioning from an early intervention program to preschool.

**Citation:** N.J.A.C. 6A:14-3.3(e)1; 20 U.S.C. §1412(a)(9); and 34 CFR §300.124(c).

**Required Action:** The district must ensure a member of the child study team participates in the planning conferences for each student transitioning from early intervention to preschool. In order to demonstrate correction of noncompliance, the district must conduct training for child study team members and develop an oversight

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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 demonstrating participation of a child study team member in the transition planning conferences conducted between August 2013 and December 2013 and the oversight procedures.

**Finding 25:**

**Condition:** The district does not have a policy for the provision of accommodations and modifications or, when appropriate, an alternate assessment for students with disabilities participating in district wide assessments.

**Citation:** N.J.A.C. 6A:14-1.2(15); 20 U.S.C. §1412(a)(16); 34 CFR §300.160.

**Required Action:** The district must revise policies and procedures to ensure students with disabilities participate in district wide assessment and that each IEP contains a statement of any individual modifications to be provided to the student in the administration of district wide assessments. The policy must include the provision of accommodations and modifications and the provision of alternate assessments for those children who cannot participate in the regular assessment. If the district reports publicly on the district wide assessment, the district must also report with the same frequency and in the same detail as it reports on the assessment of nondisabled children. In order to demonstrate correction of noncompliance, the district must conduct training for child study team members regarding the procedures for implementing the requirements in the citations listed above. In addition, a monitor from the NJDOE will conduct an on-site visit to review the policy and IEPs developed between August 2013 and December 2013.

**Carl D. Perkins**

**Finding 26:**

**Condition:** A review of the district's general ledger records disclosed the district incorrectly used Function/Object code for Instructional Supplies (100-600) to record Carl D. Perkins expenditures for Equipment (400-731).

**Citation:** Perkins§135 (a)&(b)1-12 Expenditures correspond to the approved uses specified in the approved application.

**Required Action:** The district must ensure expenditures are charged to the appropriate Function/Object code.

**Finding 27:**

**Condition:** Equipment purchased with Perkins funds did not have visible, permanently attached, numbered inventory tags indicating the federal funding source. Two iPad carts did not include inventory tags.

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**Citation:** OMB Circular A-87; EDGAR 80.32; Perkins: P.L. 109-270 § 135 (b) 7, Perkins One Year Grant Application Guidelines July 1, 2011-2012 Section A: 4.4 Supplement Not Supplant and Section D:1.5.7 Equipment.

**Required Action:** The district must place visible, permanently attached, numbered inventory tags with the federal funding source on all equipment. The district must ensure equipment purchased with Perkins funds is utilized primarily in the CTE programs for which it was approved.

**Administrative**

**Finding 28:**

**Condition:** On numerous 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:** 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 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).