



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

July 25, 2016

Dr. David Gentile, Superintendent
Millville School District
PO Box 5010
Millville, NJ 08336-0946

Dear Dr. Gentile:

The New Jersey Department of Education has completed a review of funds received and disbursed from one or more federal programs by the **Millville 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 January 15, 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/.

Utilizing the process outlined in the attached "Procedures for LEA/Agency Response, Corrective Action Plan and Appeal Process," the Millville 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:Millville School District Cover Letter /consolidated monitoring 15-16
Enclosures

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New Jersey K-12 Education

**CONSOLIDATED MONITORING REPORT
JULY 2016**

District: Millville Public Schools
County: Cumberland
Dates On-Site: January 13, 14, 15 and April 25, 26, and 27, 2016
Case #: CM- 018-15

FUNDING SOURCES

| Program | Funding Award |
|------------------|---------------------|
| Title I, Part A | \$ 1,702,512 |
| Title I, SIA | 8,900 |
| Title II, Part A | 226,529 |
| Title III | 18,361 |
| Carl D. Perkins | 56,671 |
| IDEA Basic | 1,511,824 |
| IDEA Preschool | 29,544 |
| | <hr/> |
| Total Funds | <u>\$ 3,554,341</u> |

**MILLVILLE PUBLIC SCHOOLS
CONSOLIDATED MONITORING REPORT
JULY 2016**

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, 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 Millville Public Schools 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 I, Part A, SIA (Title I SIA); Title II, Part A (Title II); Title III, Part A (Title III); Carl D. Perkins (Perkins); IDEA Basic and Preschool for the period July 1, 2014 through January 15, 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, Title III, Carl D. Perkins, and IDEA Basic and Preschool from July 1, 2014 through January 15, 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, TITLE II, TITLE III, CARL D. PERKINS,
AND IDEA FUNDS**

Title I

The district used its FY2015-2016 Title I funds to operate schoolwide programs in all of its Title I funded schools. Primarily, the district provided supplemental instructional opportunities through in-class support (Response to Intervention), and extended year programs.

Title II

The district used its FY 2015-2016 Title II funds to implement a schoolwide program. Primarily, the school used its allocation to support the salaries of teachers to further reduce class sizes in kindergarten and elementary grade level below the requirements of code to enhance early intervention.

Title III

The district used its FY 2015-2016 Title III funds to provide professional development for bilingual/ESL staff, software, instructional materials, and family programs.

Carl D. Perkins

The district is using its FY 2015 – 2016 funds to provide support for the 11 career and technical education programs: Digital Communication and Media/Multimedia (090702); Entrepreneurship/Entrepreneurial Studies (520701); Management Information Systems (521201); Accounting (520301); Cooking & Related Culinary Arts (120500); Computer Programming/Programmer (110201); CAD/CADD Drafting and/or Design Technology/Technician (151302); Woodworking (480701); Sales, Distribution, and Marketing Operations (521801); Engineering Technology (150000); and Automobile/Automotive Mechanics Technology/Technician (470604).

IDEA (Special Education)

The district used its FY 2015-2016 IDEA funds to fund salaries for special education teachers, paraprofessionals, support staff, child study team members, and a special education administrator. Funds were also used for staff training, licenses for web based educational programs, employee benefits, instructional supplies and equipments, and student transportation. Coordinated Early Intervening Services (CEIS) funds were used for contracted services with Drexel University to support implementation of the Response to Intervention (RTI) program through professional development for RTI.

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DETAILED FINDINGS AND RECOMMENDATIONS

Title I

Finding 1: The district did not complete schoolwide plans for each of its four non-categorized schools. The documents provided did not meet the legislative requirements of a comprehensive schoolwide plan. 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: Each of the four non-categorized schools must fill out a Schoolwide Plan that reflects 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 for review, or reverse all Title I funds used to benefit these schools.

Finding 2: The district's Title I schools did not have a parental involvement program that reflected the requirements of the Title I legislation. The schools provided limited evidence of an active stakeholder committee involved in the development of the Schoolwide Plan. There was no evidence, such as meeting notes, agendas and sign in sheets, that the committee was consulted in the development and implementation of the Title I Schoolwide Plan.

Citation: ESEA §1114(b)(2)(B)(ii): *Schoolwide Programs (Components of a Schoolwide Program. Plan Development)*.

Required Action: The district's Title I schools must convene and consult with their stakeholder committee for input and peer review before changes are made to the Schoolwide Plan. These meetings and consultations must be documented with an agenda, sign in sheets and minutes submitted to the committee members for review and approval. The schools must provide documentation to the NJDOE that its FY 2015-2016 Schoolwide Plans were developed in consultation with their stakeholder committees.

Finding 3: The district did not provide school-level Title I parental involvement policies for all of its Title I schools.

Citation: ESEA §1118(b): *Parental Involvement (School Parental Involvement Policy)*.

Required Action: The district should provide technical assistance to its schools in the development of school-level parental involvement policies and ensure each school works with stakeholder groups to develop the policies and review them annually. The district must

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also submit evidence of engaging parents in the development and review of the school-level policies (meeting agendas, sign in sheets, minutes) to the NJDOE for review.

Finding 4: The FY 2015-2016 school-parent compact was developed only for students participating in the basics skills program. In a schoolwide program, the school must provide all parents an opportunity to understand their role in the shared responsibilities for student academic achievement.

Citation: ESEA §1118(d): *Parental Involvement (Shared Responsibilities for High Student Academic Achievement)*.

Required Action: The district must revise the school-parent compact for all students and ensure the compact is disseminated to all parents. The district must submit the revised FY 2015-2016 school-parent compact to the NJDOE for review.

Finding 5: The Lakeside Middle School has teachers who do not meet the highly qualified teacher (HQT) requirements and was required to send out the Parents' Right-to-Know HQT follow-up letter by November 1, 2015. The school is required to send this letter to the parents of any child who is taught for four or more consecutive weeks by a teacher who has not met the HQT requirements.

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

Required Action: Due to preparation for the implementation of ESSA, no further action is required.

Finding 6: The district's Title I schools did not provide information to parents in multiple languages. Schools are required to provide information to parents of students participating in Title I programs in a language that is understandable and in a uniform format, including alternative formats upon request.

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

Required Action: The schools must have all required documents translated into a language that is understandable to the parents of the students served. The documents that must be in multiple languages are the District/School Parental Involvement Policy, Parent-School Compact and the Right-to-Know Letter, at a minimum. The district must submit copies of these documents to the NJDOE for review.

Finding 7: The district made purchases exceeding the micro purchase limit (small purchase) and did not have secondary quotes as required.

Citation: Uniform Guidance 2 CFR 200.320, Methods of procurement to be followed.

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Required Action: The district must update its internal controls to ensure all procurement rules are followed. The district must submit updated procedures to the NJDOE for review, including its process for training staff on the new procedures.

Finding 8: The district made purchases using the small purchase rules and did not select the lowest quote. Further, the district did not provide any documentation as to why the lowest quote was not acted upon.

Citation: Uniform Guidance 2 CFR 200.320, Methods of procurement to be followed.

Required Action: The district must update its internal controls to ensure all procurement rules are followed. The district must submit updated procedures to the NJDOE for review, including its process for training staff on the new procedures.

Finding 9: To bypass federal procurement requirements, the district made purchases over the Simplified Acquisition Threshold from Dell Computers over a 30-day period through a series of purchase orders.

Citation: Uniform Guidance 2 CFR 200.320, Methods of procurement to be followed.

Required Action: The district must update its internal controls to ensure all procurement rules are followed. The district must submit updated procedures to the NJDOE for review, including its process for training staff on the new procedures.

Title II

Finding 10: The district did not have a district-based professional development plan for FY 2015-2016 and the school-level professional development plans did not meet the state requirements set forth in code. Furthermore, district schools did not have individual school-level professional development plans for FY 2014-2015 and the FY 2015-2016 district professional development plan did not meet state requirements. 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. Activities in the school-level plans must be consistent with the district professional development plan. 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* and N.J.A.C. 6A:9C-4.2: District – school-level plans for professional development implementation.

Required Action: The district and its schools must create professional development plans that are consistent with professional development funded activities. The district and schools must submit professional development plans for FY 2016-2017 along with board approval to the NJDOE for review.

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Finding 11: The district's use of Title II funds for the following individual memberships is unallowable under federal cost principles:

| Item | Organization | PO# | Account Code | Amount |
|-------|---------------------------------------|---------|--------------------------------------|-----------|
| 1 | Smithsonian | 1611070 | 20-5-270-2000-89000-0000-00-6-346890 | \$ 54.00 |
| 2 | National Council Teacher of Math | 1611396 | 20-5-270-2000-89000-0000-00-6-346890 | 180.00 |
| 3 | National Council Teacher of Math | 1612496 | 20-5-270-2000-89000-0000-00-6-346890 | 90.00 |
| 4 | National Council Teacher of Math | 1611881 | 20-5-270-2000-89000-0000-00-6-346890 | 90.00 |
| 5 | National Science Teachers Association | 1611657 | 20-5-270-2000-89000-0000-00-6-346890 | 395.00 |
| Total | | | | \$ 809.00 |

Citation: 2 CFR §200.454: Memberships, subscriptions, and professional activity costs.

Required Action: The district must reverse the charges for the unallowable expenditures and submit the adjusting entry showing the removal to the NJDOE for review.

Finding 12: The district failed to provide adequate documentation to support its use of \$6,825.00 of Title II funds to pay for the salaries during the summer of FY 2015. Based on the documentation provided, the district's use of these funds for this purpose appeared to supplant not supplement other funding sources. As a result, it could not be determined if the costs were reasonable, necessary or allocable to the federal award.

Citation: ESEA §2123(b): *Local Use of Funds (Supplement, Not Supplant)* and 2 CFR §200.403: Basic Considerations (Factors affecting allowability of costs).

Required Action: The district must provide the NJDOE adequate documentation supporting these charges, or reverse all unsupported charges and submit the adjusting entry to NJDOE.

Finding 13: The district's use of \$6,250.00 to pay teacher's salaries for the district's tutoring program supplant not supplement other funding and is not an allowable use of Title IIA professional development funds for teachers and principals.

Citation: ESEA §2123 (b): *Local Use of Funds (Supplement, Not Supplant)* and 2 CFR §200.403: Basic Considerations (Factors affecting allowability of costs).

Required Action: The district must reverse all charges and submit the adjusting entry to NJDOE.

Finding 14: The district's use of Title IIA funds totaling \$144.54 for instructional materials for students is not an allowable use of Title IIA funds.

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Citation: ESEA §2123(b): *Local Use of Funds (Supplement, Not Supplant)* and 2 CFR §200.403: Basic Considerations (Factors affecting allowability of costs).

Required Action: The district must reverse all charges and submit the adjusting entry to NJDOE.

Finding 15: The district failed to provide adequate documentation to support the use of \$41,316.00 in Title II funds to pay for employee benefits. Based on the documentation provided, the district's use of these funds for this purpose appeared to supplant not supplement other funding sources. As a result, it could not be determined if the costs were reasonable, necessary or allocable to the federal award.

Citation: ESEA §2123(b): *Local Use of Funds (Supplement Not Supplant)* and 2 CFR §200.403: Basic Considerations (Factors affecting allowability of costs).

Required Action: The district must provide the NJDOE adequate documentation supporting these charges, or reverse all unsupported charges and submit the adjusting entry to NJDOE.

Finding 16: The district did not provide adequate documentation regarding the certification of teachers in the Lakeside Middle School. Based on the documentation provided, the district must appoint staff with the appropriate certifications to teach at the middle school level.

Citation: ESEA §11119(h)(6): *State Plans: Reports (Parent's Right-to-Know)*; ESEA §2123(a): *Local Use of Funds*; N.J.A.C. 6A:9B-9.1 Endorsement requirements; N.J.A.C. 6A:9B-9.2 Authorizations – general; and N.J.A.C. 6A:9B-9.3 Department-issued endorsements and authorizations.

Required Action: The district must disseminate the Parents' Right to Know HQT letter to parents of all students who attend district Title I schools for the 2016-2017 school year and provide documented evidence of the letter and its distribution. A template of the letter can be found at: <http://www.state.nj.us/education/title1/hqs/rtk.htm>.

Finding 17: The district did not provide adequate documentation regarding the HQT status of teachers in Lakeside Middle School. As the NJDOE transitions from the federal regulations under NCLB to ESSA, where requirements for HQT are not included in compliance requirements, the identified issue is formally noted.

Citation: ESEA §11119: *Qualifications for Teachers and Paraprofessionals* and ESEA §1111(h)(6): *Parents' Right-to-Know*.

Required Action: No further action is required by the district.

Finding 18: The district's use of funds to continually provide for class-size reduction is not allowable. Title IIA funds for class-size reduction must be used to supplement and not supplant the district budget. Historical use of Title IIA funds to create smaller class sizes is supplanting.

Citation: ESEA §2123(b): *Local Use of Funds (Supplement, Not Supplant)*.

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Required Action: The district must reverse the charges for the unallowable expenditures and submit the adjusting journal entry showing the removal to the NJDOE for review.

Title III

Finding 19: The district purchased \$2,763.05 for Reading Street core instructional materials. In the absence of Title III funds the district would have to provide core instructional materials; therefore, the use of Title III funds for state required Spanish language arts content materials supplanted state/local funds.

Citation: ESEA §3115(g): *Subgrants to Eligible Entities (Supplement, Not Supplant)*.

Required Action: The district must reverse the expenditure of Title III funds for the Spanish language arts materials and use state/local funds instead. The district must submit documentation of the adjusting entries to the NJDOE for review.

Finding 20: The district's Title III parental notification letter did not contain all the required components. The missing components were: the description of method instruction to be used to serve the (English Language Learners) ELLs; other methods of instruction and how those methods may differ in content; and instructional goals, etc. In addition, the letter did not include the date of notification.

Citation: ESEA §3302: *Parental Notification*.

Required Action: The district's Title III parental notification letter needs to fully describe all ELL program types and include the notification date. The district must also retain a copy of the notification letter. The district must revise the FY 2016-2017 parental notification letter and submit a copy to the NJDOE for review. Additionally, the district must reissue the revised letter to parents of ELLs. For more information see: <http://www.nj.gov/education/bilingual/title3/accountability/notification>.

Finding 21: The monitors determined ELLs in the middle school grades did not have access to the science laboratory to support instructional content learning, although other students have laboratory access in their science classes. Instructional methodology proven to be effective for non-ELLs must also be provided to support the academic growth of ELLs.

Not having access to the science laboratory to complement classroom instruction restricts ELLs' access to additional classroom tools and supports.

Citation: ESEA §3115(c): *Subgrants to Eligible Entities*.

Required Action: The district must restructure its science program to provide equal access to laboratories for ELLs in middle school grade levels.

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Carl D. Perkins

Finding 22: The funds allocated for the Perkins grant in the district's accounting records could not be reconciled with corresponding amounts budgeted in the Electronic Web Enabled Grant system (EWEG).

Citation: 2 CFR §200.302: Financial management.

Required Action: The district must implement a process to ensure amounts awarded through a grant are recorded appropriately in the financial records.

Finding 23: A review of the district's general ledger disclosed revenue and program codes of 1420 and 000, respectively, were incorrectly used to record the receipt of Perkins funds. The Uniform

Chart of Accounts for New Jersey School Districts (Chart of Accounts) designates 4430 as the appropriate revenue code and 361 through 399 as the appropriate program codes for recording federally funded Perkins grant funds. The use of distinct revenue codes provides an audit trail of the reimbursements received for each project.

Citation: N.J.A.C. 6A:23A-16.2(f)(1): Principles and directives for accounting and reporting. 2 CFR §200.302(b)(3): Financial management. 34 CFR §76.730(e): Records related to grant funds.

Required Action: The district must revise its coding system to conform to the NJDOE's prescribed Chart of Accounts to ensure the proper recording of all financial transactions. The district must also implement procedures to ensure the expenditures are charged to the prescribed expenditure categories.

Finding 24: The district purchase orders did not contain required information. Among other things, district purchase orders did not reflect the approved Classification of Instructional Program code or the intended location of equipment and/or personal computers. Also, per the Perkins Guidelines grantees must maintain cancelled checks.

Citation: Perkins Guidelines, Section 8.3.3: *Managing the Grant (What Records Should Be Available for Inspection?)*. 34 CFR § 76.700: Compliance with statutes, regulations, State plan, and applications.

Required Action: The district must implement procedures to ensure personnel assigned to administer the Perkins grant receive appropriate training including attending technical assistance sessions offered by the NJDOE's Office of Career Readiness or other relevant federal grant technical assistance sessions sponsored by the NJDOE. The district must also comply with the program specific requirements applicable to each project period.

Finding 25: The district did not provide opportunities to participate in structured learning experiences (SLE) for all students enrolled in approved CTE programs.

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Citation: Perkins Act §135(b)(3) and N.J.A.C. 6A:19-4, Structured Learning Experiences.

Required Action: The district must offer CTE students opportunities to explore all aspects of their career programs through participation in SLEs linked to the New Jersey Core Curriculum Content Standards in all approved CTE programs. The district should contact its Perkins program officer for technical assistance.

Finding 26: The district provided evidence of an SLE for Cooking and Related Arts (CIP 120500), but the New Jersey Model Employer/Agency Agreement for Unpaid, School-Sponsored Structured Learning Experiences was not completed in its entirety. In addition, The “Unpaid Structured Learning Experience Student Training Plan” was not attached to any of the agreements.

Citation: Perkins Act §135(b)(3), N.J.A.C. 6A:19-4, Structured Learning Experiences, and N.J.A.C. 12:56-18, School-to-Work Program.

Required Action: The district should contact its NJDOE SLE coordinator for technical assistance.

Finding 27: The district had inadequate documentation for all CTE advisory board meetings for their CTE programs.

Citation: Perkins Act §134(b)(5) and N.J.A.C. 6A:19-3.1, Program requirements.

Required Action: The district must ensure at least two advisory board meetings are held each project period for all approved CTE programs. The advisory boards must include the required membership as indicated in the New Jersey Administrative Code listed above. The district must maintain evidence meetings took place including sign in sheets indicating the name, organizational affiliation of each member and including signatures of those in attendance at the meetings. Once the advisory boards have been established the district must submit a copy of the advisory board minutes and sign in sheets to their Perkins program officer. Programs without evidence of functioning advisory boards will not be considered approved programs and will not be eligible for future Perkins funding.

Finding 28: All CTE program curricula did not incorporate the New Jersey Core Curriculum Content Standards.

Citation: Perkins Act §134(b)(3).

Required Action: The district must align their CTE curriculum to reflect the New Jersey Core Curriculum Content Standard Nine (Career Ready Practices and Standard 9.3, Career and Technical Education) and the curriculum must be board approved.

Finding 29: The district is not offering a coherent sequence of three courses for the following CTE programs: Entrepreneurship (CIP Code 520701), Management Information Systems (CIP Code 521201), and Sales, Distribution & Marketing Operations (CIP Code 521801).

Citation: Perkins Act §122 (c)(1)(A) and N.J.A.C. 6A: 19-3.1, Program requirements.

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Required Action: The district must ensure coherent sequences of three courses are 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 30: Articulation agreements were not provided for all CTE programs of study.

Citation: Perkins Act §135(b)(1-9), 122 (c)(1)(A) and (c)(1)(C).

Required Action: The district must ensure they have a current signed and dated articulation agreement on file for all CTE programs of study. The agreement must be signed annually by the district superintendent and college president.

Finding 31: The district did not provide sign in sheets and other evidence confirming CTE participation in professional development.

Citation: Perkins Act §134(b)(4) and 135(b)(5).

Required Action: The district must identify opportunities for teachers to receive industry-specific professional development. The district must ensure completed sign in sheets, as well as agendas are maintained for any professional development activities supported by Perkins grant funds.

Finding 32: The district did not conduct evaluations of CTE programs and review CTE student performance data annually.

Citation: Perkins Act §135(b)(1-9).

Required Action: The district must ensure program data is reviewed annually and CTE program performance is evaluated annually based on the review of relevant CTE program data. Evidence demonstrating a review and evaluation was conducted must be maintained by the district for monitoring purposes.

Finding 33: The district did not provide evidence that any materials and/or procedures to increase and support nontraditional student participation were developed and implemented.

Citation: Perkins Act §134(b)(8-10); 135(b)(6) and 135(b)(9).

Required Action: The district must conduct activities or implement strategies to increase participation and success of nontraditional students and other special population students in CTE programs. The district is advised to contact its Perkins program officer for resources and assistance with developing appropriate strategies.

Finding 34: The district did not provide demographic data for each CTE program of study, it was not possible to analyze that there was equitable access to all programs related to race, gender and socioeconomic status.

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Citation: Perkins Act §134(b)(8-10); 135(b)(6) and 135(b)(9).

Required Action: The district must conduct activities or implement strategies to increase participation and success of nontraditional students and other special population students in CTE programs. The district is advised to contact its Perkins Program officer for resources and assistance with developing appropriate strategies.

Finding 35: The district did not provide professional development for all CTE teachers, as summarized in the FY 2014-15 final report performance narrative.

Citation: Perkins Guidelines, 8.4.1 Final Reports.

Required Action: The LEA must provide reasonable assurance it reports complete and accurate information to the department.

Finding 36: The district expended \$182.00 of FY 2014-2015 Perkins grant funds to purchase individual DECA memberships for students and an advisor via purchase order #1512939. The payment of individual membership dues is non-allowable cost.

Citation: Perkins Guidelines, Appendix E: Non-Allowable Costs.

Required Action: The district must improve procedures to ensure all Perkins expenditures represent allowable program costs and conform to requirements contained in the Guidelines.

IDEA (Special Education)

Finding 37: The district did not consistently provide parents written notice that contains all required components, within 15 calendar days following reevaluation planning meetings and meetings conducted to determine continued eligibility for students eligible for special education and related services.

Citation: 20 U.S.C. §1414(b); 34 CFR §300.503(a-c); and 34 CFR §300.504) and N.J.A.C. 6A:14-2.3(f) and 2.3(g).

Required Action: The district must ensure parents are provided written notice following a meeting containing all required components within 15 calendar days of the meeting. In order to demonstrate correction of noncompliance, the district must provide training for child study team members and develop an oversight mechanism to ensure compliance with the requirements in the citation listed above. A monitor from the NJDOE will conduct an on-site visit to interview staff, review copies of written notice sent to parents following meetings conducted between September 2016 and December 2016, and to review the oversight procedures.

Finding 38: The district did not conduct meetings within 20 calendar days of receipt of a written request for a child study team evaluation to determine if an evaluation was warranted for preschool age students.

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

Required Action: The district must ensure identification meetings are conducted within 20 calendar days of receipt of a written request for evaluation and the required participants are in attendance. 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 from meetings conducted between September 2016 and December 2016, and to review the oversight procedures.

Finding 39: 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 detailing 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 eligibility meetings were held between September 2016 and December 2016, and to review the oversight procedures.

Finding 40: The district did not consistently conduct all required sections of the functional assessment as a component of initial evaluations for preschool age students referred for special education and related services. Specifically, evaluation reports did not contain an observation in other than a testing environment.

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); 34 CFR 300.304(b)(1).

Required Action: The district must ensure all components of the functional assessment are conducted as part of all initial evaluations. In order to demonstrate correction of noncompliance, the district must conduct training for child study team members and develop an oversight mechanism to ensure compliance with the requirements in the citation listed above. A monitor from the NJDOE will conduct an on-site visit to interview staff, review initial evaluation reports for students evaluated between September 2016 and December 2016, and to review the oversight procedures.

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Finding 41: 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. §1414(d)(1)(D); and 34 CFR §300.321(f).

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 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 of participation of a child study team member in the transition planning conferences conducted between September 2016 and December 2016, for students transitioning from early intervention to preschool, and to review the oversight procedures.

Finding 42: The district did not consistently document all required considerations and statements in each IEP for students eligible for special education and related services. Specifically, IEPs did not consistently include all required age 14 transition statements.

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

Required Action: The district must ensure 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 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 43: The district did not consistently follow appropriate procedures to evaluate students referred for a speech-language evaluation. Speech-language specialists conducted screenings of individual students to determine if an evaluation was warranted prior to initiating the formal referral process.

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

Required Action: The district must ensure identification meetings are conducted within 20 calendar days of receipt of a written request for evaluation and the required participants are in attendance. In addition, the district must discontinue the practice of screening individual students prior to initiating the 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 citations

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listed above. A monitor from the NJDOE will conduct an on-site visit to interview staff, review documentation from meetings conducted between and September 2016 and December 2016, and to review the oversight procedures.

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.