

**NEW JERSEY DEPARTMENT OF EDUCATION
OFFICE OF FISCAL ACCOUNTABILITY AND COMPLIANCE
CORRECTIVE ACTION PLAN**

SCHOOL DISTRICT NAME: South Orange and Maplewood COUNTY Essex

TYPE OF EXAMINATION: Consolidated Monitoring

DATE OF BOARD MEETING: August 26, 2013

CONTACT PERSON: Cheryl Schneider, Business Administrator

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RECOMMENDATION NUMBER	CORRECTIVE ACTION	METHOD OF IMPLEMENTATION	INDIVIDUAL RESPONSIBLE FOR IMPLEMENTATION	COMPLETION DATE OF IMPLEMENTATION
1. 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.	The District contends that supporting documentation is available as required by federal law and therefore will be included in an appeal, in accordance with the process outlined in the "Procedures for LEA/Agency Audit Response, Corrective Action Plan and Appeal Process" as required.	Appeal is being submitted.	Dr. Lydia E. Furnari, Assistant Superintendent for Curriculum & Instruction, Title I Coordinator	August, 2013

<p>2. The District did not provide evidence that multiple measures were consistently applied to determine which students were eligible to receive Title I services. The monitors were unable to verify if the District is actually serving its lowest performing students and that all students receiving services actually met the eligibility criteria.</p>	<p>The District currently tracks the Title I eligibility and participation through the student database. The monitors suggested the use of a specialized tracking mechanism that includes documentation of which criteria were applied and how the student either met or did not meet the criteria. The District will identify and establish such a tracking mechanism and submit documentation of its tracking system to the NJDOE for review.</p>	<p>The District will identify an appropriate tracking system and will begin tracking Title I eligibility and participation in this new system.</p>	<p>Dr. Lydia E. Furnari, Assistant Superintendent for Curriculum & Instruction, Title I Coordinator</p>	<p>January, 2014</p>
<p>3. 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.</p>	<p>While the District utilizes READ 180 to provide services to students based on the design of the program, and while READ 180 is an acceptable program based on the Title I application, the District will reverse the 2012-2103 Title I expenditures for READ 180 and allocate state/local funds for the expenditure.</p>	<p>The journal entry reversing the expenditure will be submitted to the NJDOE along with a narrative describing the District's revised Title I program.</p>	<p>Dr. Lydia E. Furnari, Assistant Superintendent for Curriculum & Instruction, Title I Coordinator Cheryl Schneider, Business Administrator</p>	<p>September, 2013</p>

<p>4. 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.</p>	<p>Title I school are provided additional Academic Interventionists that exceed the staffing of the Non-Title I school enabling the Title I school to provide supplemental services. This item will be included in the appeal.</p>	<p>Appeal is being submitted.</p>	<p>Dr. Lydia E. Furnari, Assistant Superintendent for Curriculum & Instruction, Title I Coordinator</p>	<p>August, 2013</p>
<p>5. 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.</p>	<p>The District did hold the required annual Title I meeting and notification of the meeting did take place. This item will be included in the appeal.</p>	<p>Appeal is being submitted.</p>	<p>Dr. Lydia E. Furnari, Assistant Superintendent for Curriculum & Instruction, Title I Coordinator</p>	<p>August, 2013</p>

<p>6. The District did not provide evidence 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 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.</p>	<p>The 2012-2013 Highly Qualified Teacher (HQT) letter to parents of all students who attend Title I schools is posted on the District website. The 2013-2014 letter is being submitted to the NJDOE for review prior to letter distribution.</p>	<p>The 2013-2014 letter is being submitted to the NJDOE for review prior to letter distribution.</p>	<p>Dr. Lydia E. Furnari, Assistant Superintendent for Curriculum & Instruction, Title I Coordinator</p>	<p>September, 2013</p>
<p>7. 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-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.</p>	<p>The District has a written District parental policy which is evaluated annually as required. Copies of the policy will be submitted along with an appeal of this item.</p>	<p>Appeal is being submitted.</p>	<p>Dr. Lydia E. Furnari, Assistant Superintendent for Curriculum & Instruction, Title I Coordinator</p>	<p>August, 2013</p>

<p>8. 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.</p>	<p>The District presented refusal letters on file but did not have evidence for all nonpublic schools. The process is being updated to assure that all appropriate evidence is on file in the future.</p>	<p>Documentation of the refusal form(s) or the consultation process will be sent to the NJDOE for review.</p>	<p>Dr. Lydia E. Furnari, Assistant Superintendent for Curriculum & Instruction, Title I Coordinator</p>	<p>September, 2013</p>
<p>9. For FY 2012-2013, the South Orange 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.</p>	<p>The 2012-2013 application was awaiting a state decision regarding funding for South Orange Middle School. This decision was received at the time of the review and the monitors were informed of this change. Submittal of the amended application removed South Orange Middle School from the budget.</p>	<p>Appeal is being submitted.</p>	<p>Dr. Lydia E. Furnari, Assistant Superintendent for Curriculum & Instruction, Title I Coordinator</p>	<p>August, 2013</p>

<p>10. The District's FY 2011-2012 and FY 2012-2013 contract with the ERESO 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.</p>	<p>The District will work with the ERESO to revise the current contract as suggested.</p>	<p>The revised contract will be made available at the follow-up monitoring review.</p>	<p>Dr. Patricia Barker, Director of Special Services</p>	<p>September, 2013</p>
<p>11. 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.</p>	<p>ISP services are documented as required. The District is committed to implement an oversight mechanism to ensure services are documented in all ISPs and provided appropriately.</p>	<p>The District will implement an oversight mechanism.</p>	<p>Dr. Patricia Barker, Director of Special Services</p>	<p>January, 2014</p>

<p>12. 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 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.</p>	<p>The District will provide parents notice of a meeting that contains all required components early enough to ensure the parent has the opportunity to attend.</p>	<p>The District will provide training for child study team members and speech-language specialists and develop an oversight mechanism to monitor compliance with the requirements cited.</p>	<p>Dr. Patricia Barker, Director of Special Services</p>	<p>January, 2014</p>
<p>13. The District did not consistently obtain written parental consent to conduct an initial evaluation for students referred for speech-language services.</p>	<p>The District will ensure that informed parental consent is obtained before conducting initial evaluations.</p>	<p>The District will conduct training for speech-language specialists and develop an oversight mechanism to ensure compliance with the requirements in the citations listed above.</p>	<p>Dr. Patricia Barker, Director of Special Services</p>	<p>January, 2014</p>

<p>14. The District did not consistently provide copies of evaluation report to parents at least 10 days prior to the eligibility meeting.</p>	<p>The District does consistently provide copies of evaluation reports to parents at least 10 days prior to the eligibility meeting. This item will be included in the appeal.</p>	<p>Appeal is being submitted.</p>	<p>Dr. Patricia Barker, Director of Special Services</p>	<p>August, 2013</p>
<p>15. 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.</p>	<p>The District does consistently provide students eligible for special education and related services a summary of academic achievement and functional performance prior to graduation. This item will be included in the appeal.</p>	<p>Appeal is being submitted.</p>	<p>Dr. Patricia Barker, Director of Special Services</p>	<p>August, 2013</p>

<p>16. 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.</p>	<p>The District does consistently convene IEP team meetings. This item will be included in the appeal.</p>	<p>Appeal is being submitted.</p>	<p>Dr. Patricia Barker, Director of Special Services</p>	<p>August, 2013</p>
<p>17. 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; 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.</p>	<p>The District does consistently document the listed items 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. This item will be included in the appeal.</p>	<p>Appeal is being submitted.</p>	<p>Dr. Patricia Barker, Director of Special Services</p>	<p>August, 2013</p>

<p>18. 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.</p>	<p>The District does consistently include required consideration and statement in each IEP for students eligible for special education and related services. However, there were some inconsistencies related to speech-only services. The required action suggest that the District should revise IEPs for specific students identified as noncompliant. This monitoring was completed in March 2013. The District did not receive identification of any noncompliant IEPs at the time of the monitoring nor has it received any such identification in the interim 5 months since the monitoring was completed.</p>	<p>The District will conduct training for child study team members and speech-language specialists and develop an oversight mechanism to ensure compliance with the requirements cited.</p>	<p>Dr. Patricia Barker, Director of Special Services</p>	<p>January, 2014</p>
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<p>19. 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.</p>	<p>The District will 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 will 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.</p>	<p>The District will conduct training for administrators and the I&RS team members and develop an oversight mechanism to ensure compliance with the requirements cited.</p>	<p>Dr. Patricia Barker, Director of Special Services</p>	<p>January, 2014</p>
<p>20. 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.</p>	<p>The District does ensure identification meetings are conducted within 20 calendar days of receipt of a written request for evaluation with required participants in attendance. However there have been inconsistencies with preschool identification meetings and therefore procedures and documents are being updated.</p>	<p>The District will conduct training for child study team members and speech-language specialists and develop an oversight mechanism to ensure compliance with the requirements cited.</p>	<p>Dr. Patricia Barker, Director of Special Services</p>	<p>January, 2014</p>

<p>21. 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.</p>	<p>The District will ensure that 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.</p>	<p>The District will conduct training for child study team members and develop an oversight mechanism to ensure compliance with the requirements cited.</p>	<p>Dr. Patricia Barker, Director of Special Services</p>	<p>January, 2014</p>
<p>22. 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.</p>	<p>The District does consistently conduct multidisciplinary initial evaluations however the evaluations were not always properly documented. Procedures are being updated to ensure that proper documents are obtained in the future.</p>	<p>The District will conduct training for speech-language specialists and develop an oversight mechanism to ensure compliance with the requirements in the citations listed above.</p>	<p>Dr. Patricia Barker, Director of Special Services</p>	<p>January, 2014</p>

<p>23. 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.</p>	<p>The District believes that all required sections of the initial evaluations were consistently completed but that these evaluations were not always properly documented. Procedures are being updated to ensure that proper documents are maintained in the future.</p>	<p>The District will conduct training for child study team members and speech-language specialists and develop an oversight mechanism to ensure compliance with the requirements cited.</p>	<p>Dr. Patricia Barker, Director of Special Services</p>	<p>January, 2014</p>
<p>24. The District did not ensure child study team participation at the planning conference of students transitioning from an early intervention program to preschool.</p>	<p>The District did have a child study team participant at the planning conference of students transitioning from an early intervention program to preschool. This item will be included in the appeal.</p>	<p>Appeal is being submitted.</p>	<p>Dr. Patricia Barker, Director of Special Services</p>	<p>August, 2013</p>

<p>25. 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.</p>	<p>Board policy addresses the provision of accommodation and modifications for students with disabilities participating in district wide assessments. This item will be included in the appeal.</p>	<p>Appeal is being submitted.</p>	<p>Dr. Patricia Barker, Director of Special Services</p>	<p>August, 2013</p>
<p>26. 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).</p>	<p>The District will ensure expenditures are charged to the appropriate Function/Object code.</p>	<p>The District will ensure expenditures are charged to the appropriate Function/Object code.</p>	<p>Cheryl Schneider, Business Administrator</p>	<p>April, 2013</p>

<p>27. 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.</p>	<p>The District tags all inventory with visible, permanently attached, numbered inventory tags. Additional labeling indicating the federal funding source will be placed on equipment, as appropriate.</p>	<p>Equipment purchased with federal funding will be labeled as such.</p>	<p>Cheryl Schneider, Business Administrator Paul Roth, Chief Information Officer</p>	<p>April, 2013</p>
<p>28. 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.</p>	<p>Purchase orders will be issued to vendors prior to goods or services being provided.</p>	<p>Special services provider purchase order procedures have been updated to create purchase orders prior to goods or services being provided.</p>	<p>Cheryl Schneider, Business Administrator Dr. Patricia Barker, Director of Special Services</p>	<p>April, 2013</p>

Chief School Administrator Date

Board Secretary/Business Administrator Date