



State of New Jersey

DEPARTMENT OF EDUCATION



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PO Box 500

TRENTON, NJ 08625-0500

DAVID C. HESPE

Commissioner

April 25,  
2016

Dr. James Ruffin, Interim Superintendent  
Fairfield Township-School District  
375 Gouldtown-Woodruff Road  
Bridgeton, NJ 08302

Dear Dr. Ruffin:

The New Jersey Department of Education has completed a review of funds received and disbursed from one or more federal programs by the Fairfield Township 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 March 9, 2016. The resulting report is enclosed. Please provide a copy of the report to each board member. All issued Consolidated Monitoring Reports will be posted on the department's website at [www.state.nj.us/education/compliance/monitor/](http://www.state.nj.us/education/compliance/monitor/).

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

[www.nj.gov/education](http://www.nj.gov/education)

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FAIRFIELD TOWNSHIP SCHOOL DISTRICT  
375 GOULDTOWN-WOODRUFF ROAD  
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New Jersey K-12 Education

CONSOLIDATED MONITORING REPORT

APRIL 2016

District: Fairfield Township School District  
County: Cumberland  
Dates On-Site: February 25, 26 and March 9, 2016  
Case #: CM-017-15

FUNDING SOURCES

Program	Funding Award
Title 1, A	\$ 340,237
Title 11, Palt A	48,437
IDEA Basic	200,067
IDEA Preschool	5,546
Total Funds	<hr/> \$ 594,287 <hr/>

FAIRFIELD TOWNSHIP SCHOOL  
DISTRICT CONSOLIDATED  
MONITORING REPORT APRIL 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, Race to the Top, and Carl D. Perkins). The laws further require state education agencies such as the New Jersey Department of Education (NJDOE) monitor the implementation of federal programs by sub recipients and determine whether the funds are being used by the district for their intended purpose and achieving the overall objectives of the funding initiatives.

## INTRODUCTION

The NJDOE visited the Fairfield Township School District to monitor the district's use of federal funds and the related program plans, where applicable, to determine whether the schools' programs are meeting the intended purposes and objectives, as specified in the current year applications and authorizing statutes, and to determine whether the funds were spent in accordance with the program requirements, federal and state laws, and applicable regulations. The on-site visit included staff interviews and documentation reviews related to the requirements of the following programs: Title I, Part A (Title I); Title II, Part A (Title II); IDEA Basic and Preschool for the period July 1, 2014 through March 9, 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 (IBP), 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, and IDEA Basic and Preschool from July 1, 2014 through March 9, 2016. A sampling of purchase orders and/or salaries was taken from each program reviewed.

## GENERAL OVERVIEW OF USES OF TITLE I TITLE II AND IDEA FUNDS

### Title 1

FAIRFIELD TOWNSHIP SCHOOL  
DISTRICT CONSOLIDATED  
MONITORING REPORT APRIL 2016

The district is using its FY2015-2016 Title T funds to implement a schoolwide program. Primarily, the district provides supplemental instructional opportunities through extended day and extended year programs. The district is also using grant funds to support increased use of technology.

Title 11

The district is using its FY 2015-2016 Title II funds to provide additional professional development for teachers to strengthen skills and close the achievement gap.

IDEA (Special Education)

The district is using its FY 2015-2016 IDEA funds for contracted Child Study Team Services which include evaluations, case management and consultation. Funds are also being used to reduce tuition costs for students receiving special education services in approved private schools for students with disabilities.

DETAILED FINDINGS AND RECOMMENDATIONS

Title 1

Finding 1: The district did not provide evidence its Title I school convened an annual Title I parent meeting. In a Title I schoolwide program, all parents/guardians must be informed about the school's Title I program, legislative requirements, and how they can become actively engaged in helping their child/children succeed academically.

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

Required Actions: The district must convene its FY 2015-2016 annual Title I parent meeting and submit evidence (e.g., invitational letter/flyer, agenda, meeting minutes, sign in sheets) to the NJDOE for review.

Finding 2: There was no evidence the district parental involvement policy was reviewed for the current school year. The annual review and current board adoption allow parents and other stakeholders to impact the parental involvement process and identify the unique needs of the Title I schools and Title I parents.

Citation: ESEA § 1118 Parental Involvement (Written Policy), and ESEA § 1118(b): Parental Involvement (School Parental Involvement Policy).

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

FAIRFIELD TOWNSHIP SCHOOL  
DISTRICT CONSOLIDATED  
MONITORING REPORT APRIL 2016

that during the 2015-2016 school year these documents were developed with the input of the parents/guardians of Title I students.

EOcJjug\_3\_;. The district's parents' web page did not contain the required annual notifications for parental involvement.

Citation: ESEA 51 I I I (h)(2)(E): State Plans (Public Dissemination).

Required Action: The district must review and update its parental involvement web page containing required annual notifications and documents to meet the broader ESEA dissemination requirement. The district must submit the link for the updated web page to the NJDOE for review.

Finding 4: The district's expenditure of Title I funds for a summer trip to Splash Zone Water Park was an entertainment related cost, which is an unallowable use of funds.

Citation: 2 CFR 5200.438: Entertainment costs.

Required Action: The district must reverse the charges for the Splash Zone Water Park and the respective busing. The district must submit documentation of the adjusting journal entry to the NJDOE for review.

Finding 5: The district did not properly procure funds under the Uniform Guidance which requires purchases over \$3,000 (Simplified Acquisition Threshold) to have formal quotes or bids. The contracts for services with Pearson and Edmentum exceeded the maximum allowable amount and should have been procured through a formal quote or bid.

Citation: 2 CFR 200.320: Methods of procurement.

Required Action: The district must begin the process of seeking formal quotes or bids for the services offered by Pearson and Edmentum or reverse the charges for these two vendors, which were incurred in violation of the Uniform Grant Guidance. The district must submit either documentation of its quote/bid process or the adjusting journal entry to the NJDOE for review.

Finding 6: The district did not have the required supporting documents to verify the activity of paraprofessionals and parent liaison charged to the Title I grant. The documentation must reflect what the staff is doing and when (time periods), and must match their funded percentage. This documentation is necessary to ensure grant funded staff are actually performing grant-related responsibilities. However, the district had alternative documentation that helped support the funding.

Citation: 2 CFR 5200.430: Compensation - personal services.

FAIRFIELD TOWNSHIP SCHOOL  
DISTRICT CONSOLIDATED  
MONITORING REPORT APRIL 2016

Required Action: The district must identify staffmembers whose salaries are supported in whole or in part with Title I funds and verify the time and activity of staff charged to the grant. The district must submit sample sheets for FY 2015-2016 to the NJDOE for review. Prior to this, the district should consult the Department's December 2012 guidance on Time and Effort Reporting for Title I Funded Staff, which is located at: <http://education.state.nj.us/broadcasts/2012/DEC/18/8649/TimeandActivityReporting.pdf> as a resource.

Findin<sup>o</sup> 7: The district charges to payroll did not match the subsidiary ledger totals from July 1, 2015 through December 31, 2015. As a result, it was unclear if proper salary amounts were being charged to the grant.

Citation: 2 CFR POO. 302, Financial management.

Required Action: The district must reconcile payroll charges from July 1, 2015 through December 31, 2015 to verify that charges are properly posted. All improperly posted charges must be reconciled and the district must submit evidence to the NJDOE for review (after December 31, 2015 the district changed its procedures and the postings matched). Any improperly charged payroll charges must be reversed and adjusting entries must be submitted to NJDOE.

## Title 11

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

### IDEA

Finding 8: The district did not offer a full-continuum of placement options for students determined eligible for special education and related services. In-class resource options were not available at the preschool, grade 1 and grade 2 levels. .

Citation: 20 USC 1412(a)(5)(A); 34 CFR 300.1146); and N.J.A.C. 6A.14-4.2.

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

FAIRFIELD TOWNSHIP SCHOOL  
DISTRICT CONSOLIDATED  
MONITORING REPORT APRIL 2016

**Finding 9:** The district did not consistently provide notice of a meeting to parents of students referred and/or eligible for special education and related services.

Citation: N.J.A.C. 6A:14-2.3(k); 20 U.S.C. §1414(b)(1); and 34 CFR 5300.3040).

Required Action: The district must ensure parents are provided notice of a meeting containing all required components, in writing, early enough to ensure that 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 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 meeting documentation for meetings conducted between September 2016 and December 2016, and to review the oversight procedures.

**Finding 10:** The district did not consistently ensure students were receiving special education services from certified special education teachers as required by IEPs. Special education teachers were frequently pulled from their instructional responsibilities to serve as substitutes. As a result, students eligible for special education and related services were not receiving the programs and services documented in the IEPs.

Citation: N.J.A.C. 6A:14-4.1(a); 20 U.S.C. 1412(a)(5); and 34 CFR 5300.119.

Required Action: The district must ensure programs and services are provided in accordance with student IEPs. The district must ensure the IEP is implemented by appropriately certificated staff and that special education teachers are not pulled from their instructional responsibilities to serve as substitutes. In order to demonstrate correction of noncompliance, the district must conduct training administrative team members and develop an oversight mechanism to ensure compliance with the requirements in the citations listed above. To demonstrate the district has corrected the individual instances of noncompliance, the district must conduct annual review meetings for identified students to discuss the need for compensatory services. A monitor from the NJDOE will conduct an on-site visit to interview staff, review documentation of staff absences, substitute lists and assignments, evidence of discussion and/or provision of compensatory services, and to review the oversight procedures.

**Finding 11:** The district did not consistently convene initial eligibility and IEP team meetings with required participants (general education teacher) in attendance for preschool and school age students eligible for special education and related services.

Citation: N.J.A.C. 6A:14-2.3(k); 20 U.S.C. 1414(b)(4); and 34 CFR 5300.321(a).

FAIRFIELD TOWNSHIP SCHOOL  
DISTRICT CONSOLIDATED  
MONITORING REPORT APRIL 2016

Required Action: The district must ensure meetings are conducted with required participants and that documentation of attendance is maintained in student's records. In order to demonstrate collection 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 meeting documentation, including the sign in sheets, for meetings conducted between September 2016 and December 2016, and to review the oversight procedures.

Finding 12: The district did not consistently document all required considerations and statements in each IEP for students eligible for special education and related services. IEPs did not consistently include documentation of the frequency, duration and location of related services.

Citation: N.J.A.C. 6A: 14-3.701-11, (e) 1-17, and (f); 20 U.S.C. §1414(d)(3)(A)(B); and 34 CFR 300.324

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 develop an oversight mechanism to ensure compliance with the requirements in the citations listed above. In addition, to demonstrate correction of individual instances of noncompliance, the district must conduct annual review meetings and revise IEPs for the specific students whose IEPs were identified as noncompliant. A monitor from the NJDOE will conduct an on-site visit to interview staff, review the revised IEPs along with a random sample of additional IEPs developed at meetings conducted between September 2016 and December 2016, and to review the oversight procedures. The names of the students whose IEPs were identified as noncompliant will be provided to the district by the monitor. For assistance with collection of noncompliance, the district is referred to the state IEP sample form which is located at: [www.stateni.us/education/specialed/forms](http://www.stateni.us/education/specialed/forms).

Finding 13: The district did not consistently document in the IEPs of students removed from the general education setting for more than 20 percent of the school day, including students placed in separate settings, consideration of placement in the LRE. Specifically, IEPs did not consistently include:

- o the supplementary aids and services considered;
- o an explanation of why the supplementary aids and services were rejected;
- o a comparison of the benefits provided in the regular class and the benefits provided in the special education class; and
- o for those students placed in separate settings, district activities to transition the student to a less restrictive environment.

FAIRFIELD TOWNSHIP SCHOOL  
DISTRICT CONSOLIDATED  
MONITORING REPORT APRIL 2016

Citation: N.J.A.C. 6A:14-4.2 (a)8(i),(ii)and (iii) and N.J.A.C. 6A:14-4.2 (a)4

Required Action: The district must ensure when determining the educational placement of a child with a disability, the IEP team considers the general education class first and all required decisions regarding placement are documented in the IEP for each student removed from general education for more than 20 percent of the school day. The district must also ensure for students placed in separate settings, the IEP team identifies activities to transition the student to a less restrictive environment and document them in each IEP. In order to demonstrate correction of noncompliance, the district must conduct training for child study team members and develop an oversight mechanism to ensure compliance with the requirements in the citations listed above. To demonstrate that the district has corrected the individual instances of noncompliance, the district must conduct annual review meetings and revise the IEPs for the specific students that were identified as noncompliant. A monitor from the NJDOE will conduct an on-site visit to interview staff, review revised IEPs, a random sample of additional IEPs developed at meetings conducted between September 2016 and December 2016, and to review the oversight procedures. The names of the students whose IEPs were identified as noncompliant will be provided to the district by the monitor.

Finding 14: The district did not consistently provide interventions in general education settings to students exhibiting academic difficulties prior to referring the student for an evaluation.

Citation: N.J.A.C. 6A: 14-3.3(b); 20 U. S.C. §1413(f)(2); and 34 CFR s300.226(b).

Required Action: The district must ensure interventions are provided in the general education setting for students exhibiting academic difficulties, prior to referring the student for an evaluation. In order to demonstrate correction of noncompliance, the district must conduct training for administrators and Intervention and Referral Services (I&RS) staff 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 I&RS team members and teachers, review documentation for students who were provided interventions in general education between September 2016 and December 2016, and to review the oversight procedures.

Findin<sup>o</sup> 15: The district did not consistently maintain documentation of the description, frequency, duration and effectiveness of the interventions provided in the general education setting through the I&RS.

Citation: N.J.A.C.6A:14-3

FAIRFIELD TOWNSHIP SCHOOL  
DISTRICT CONSOLIDATED  
MONITORING REPORT APRIL 2016

Required Action: The district must ensure I&RS documentation includes the description, frequency, duration and effectiveness of the interventions provided in the general education setting. In order to demonstrate correction of noncompliance, the district must conduct training for administrators and I&RS staff 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 I&RS team members and teachers, review documentation for students who were provided interventions in general education between September 2016 and December 2016, and to review the oversight procedures.

Findings: 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) and 3.6(b).

Required Action: The district must ensure a multidisciplinary evaluation is conducted for students referred for speech-language services by obtaining a statement from the general education teacher that details the educational impact of the speech problem on the student's progress in general education. In order to demonstrate correction of noncompliance, the district must conduct training for speech-language specialists and develop an oversight mechanism to ensure compliance with the requirements in the citation listed above. A monitor from the NJDOE will conduct an on-site visit to interview staff, review initial evaluation reports for students referred for speech-language services whose eligibility meetings were held between September 2016 and December 2016, and to review the oversight procedures.

Finding 17: The district did not consistently conduct all required sections of the functional assessment as a component of an initial evaluation for students referred for speech-language services.

Citation: N.J.A.C. 6A:14-3.4(f)(i-v); 20 U.S.C. §1414(b)(1)-(3), 1412(a)(6)(b); and 34 CFR 300.304

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

FAIRFIELD TOWNSHIP SCHOOL  
DISTRICT CONSOLIDATED  
MONITORING REPORT APRIL 2016

Finding 18: The district did not consistently conduct reevaluations within three years of the previous classification date for students eligible for speech-language services.

Citation: N.J.A.C. 6A: 14-3.8(a) and 20 U.S.C. § 1414(c)

Required Action: The district must ensure reevaluations are conducted within required time lines. 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 documentation of eligibility meetings held as part of the reevaluation process between September 2016 and December 2016, and to review the oversight procedures.

FAIRFIELD TOWNSHIP SCHOOL DISTRICT  
CONSOLIDATED MONITORING REPORT  
APRIL 2016

The NJDOE thanks you for your time and cooperation during the monitoring visit and looks forward to a successful resolution of all findings and implementation of all recommendations contained in this report.

If you have any questions, please contact Carla Spates via phone at (609) 984-5909 or via email at [carla.spates@doe.state.nj.us](mailto:carla.spates@doe.state.nj.us).

State of New Jersey  
Department of Education  
Office of Fiscal Accountability and Compliance

PROCEDURES FOR LEA/AGENCY RESPONSE  
CORRECTIVE ACTION PLAN AND APPEAL PROCESS

Board of Education Response:

Pursuant to N.J.A.C. 6A:23A-5.6, the following actions shall occur:

- (a) Any school district or county vocational school district that has been subject to an audit or investigation by the Department of Education, Office of Fiscal Accountability and Compliance (OFAC) shall discuss the findings of the audit or investigation at a public meeting of the district board of education no later than 30 days after receipt of the findings.
- (b) Within 30 days of the public meeting required in (a) above, the district board of education shall adopt a resolution certifying that the findings were discussed in a public board meeting and approving a corrective action plan to address the issues raised in the findings. The resolution shall be submitted to the OFAC within 10 days of adoption by the board of education.
- (c) The findings of the OFAC audit or investigation and the board of education's corrective action plan shall be posted on the district's web site, if one exists.

If the board of education disputes any of the findings of the audit or investigation, it may file a written appeal with the OFAC of any disputed finding(s) within 10 days of adoption of the resolution. Seeking an appeal of the findings does not preclude adherence to the provisions of (a), (b), and (c) listed above.

Corrective Action Plan:

The corrective action plan is to be used when the LEA/Agency is in agreement with any of the findings. To contest a finding, the appeal process must be used. After the appeal is settled, a corrective action plan must be filed for any finding upheld during the appeal process.

The corrective action plan must be prepared by completing the attached form. The LEA/Agency must submit the following information:

- Recommendation number
- Corrective action (approved by the board)
- Method of implementation
- Person responsible for implementation
- Completion date of implementation

If the corrective action plan is acceptable, a letter will be sent to the LEA/Agency indicating that it has been accepted,

If the corrective action plan is not acceptable, a letter will be sent to the LEA/Agency indicating whether further clarification is required or further action is necessary.

Appeal Process:

The appeal process is used to contest disputed findings.

Within 10 days of the board's adoption of the resolution approving an appeal of the findings of the audit or investigation, a written request by the LEA/Agency to review the disputed finding(s), recommendation(s), or questioned costs must be submitted to the OFAC Director. The Request for Appeal must indicate the finding(s) in question. .

The Request for Appeal must be in writing and the LEA/Agency must present any supporting documentation for the appeal. Subsequent to the submission of the Request for Appeal, the OFAC Director will issue a written decision.

If the final determination made by the Director, is still unsatisfactory to the LEA/Agency, the LEA]Agency may file a Petition of Appeal pursuant to N.J.A.C. 6A:3-113.

I:\tconaway\CAP Procedures\capfomlea.docx  
Attachment

