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Gloucester City Schools
Superintendent's Office

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Acting Commissioner

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

CHRIS CHRISTIE
Governor

KIM GUADAGNO
Lt. Governor

March 17, 2017

Mr. Joseph Rafferty, Superintendent
Gloucester City Public Schools
50 Cumberland Street
Gloucester City, NJ 08030

Dear Mr. Rafferty:

The New Jersey Department of Education has completed a review of funds received and disbursed from one or more federal programs by the Gloucester City Public Schools. The funding source reviewed was the Individuals with Disabilities Education Act. The review covered the period July 1, 2015 through March 1, 2017. 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/compliance/monitor/>.

Utilizing the process outlined in the attached "Procedures for LEA/Agency Response, Corrective Action Plan and Appeal Process," the Gloucester City Public Schools 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 States at (609 984-5909).

Sincerely,

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

RJC/CS/dk: Gloucester City Public Schools CM Cover Letter
Enclosures

www.nj.gov/education

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**STATE OF NEW JERSEY
DEPARTMENT OF EDUCATION
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520 CUMBERLAND STREET
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New Jersey K-12 Education

**CONSOLIDATED MONITORING REPORT
MARCH 2017**

District: Gloucester City Public Schools
County: Camden
Dates On-Site: February 27, 28 and March 1, 2017
Case #: CM - 015 - 16

FUNDING SOURCES

Program	Funding Award
IDEA Basic	\$ 692,114
IDEA Preschool	24,154
Total Funds	<u>\$ 716,268</u>

**GLOUCESTER CITY PUBLIC SCHOOLS
CONSOLIDATED MONITORING REPORT
MARCH 2017**

BACKGROUND

The Elementary and Secondary Education Act (ESEA) and the Individuals with Disabilities Act (IDEA) and other federal laws require districts provide programs and services based on the requirements specified in each of the authorizing statutes (i.e., ESEA, IDEA, and Carl D. Perkins). 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. Due to the impending implementation of new Every Student Succeeds Act (ESSA) regulations, only IDEA will be reviewed during consolidated monitoring.

INTRODUCTION

The NJDOE visited the Gloucester City Public Schools 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 IDEA Basic and Preschool programs for the period July 1, 2015, through March 1, 2017.

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, 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 documentation for a sample of expenditures and conducted internal control reviews.

EXPENDITURES REVIEWED

The FY 2016-2017 IDEA Basic and Preschool grants were reviewed from July 1, 2015, through March 1, 2017. A sampling of purchase orders and/or salaries was taken from each program reviewed.

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GENERAL DISTRICT OVERVIEW OF USES OF IDEA GRANT FUNDS

IDEA Projects (Special Education)

The majority of FY 2016-2017 IDEA Basic funds are being used to reduce tuition costs for students receiving special education and related services in other public school districts and approved private schools for students with disabilities. In addition, funds are used for the salary and benefits of a secretary in special services, consultation services provided to teachers of students with disabilities in nonpublic settings, instructional materials and software licenses. Preschool funds are being used for instructional supplies.

DETAILED FINDINGS AND RECOMMENDATIONS

IDEA (Special Education)

Finding 1: The district included students' names on purchase orders for students educated in tuition placements; therefore, violating student confidentiality.

Citation: 34 §CFR 99 and N.J.A.C. 6A:32-7.

Required Action: The district must revise procedures to ensure confidentiality of student information is maintained and only persons having educational responsibility for those students have access to this information. Revised procedures must be submitted to the NJDOE for review.

Finding 2: The district provides a language arts teacher and a mathematics teacher for in-class resource to nonpublic students at Gloucester Catholic High School, but these services are not included on the Individual Student Plans (ISPs) of students receiving these services. A requirement of the IDEA grant is that ISPs of students must identify services provided with IDEA funds.

Citation: 34 CFR §300.130, 144 and 300.

Required Action: The services listed in the ISPs to be provided through the IDEA grant need to match the services listed in the IDEA grant application. The provision of in-class resource provided by a language arts teacher or a mathematics teacher must be delineated in the ISPs. The district must develop procedures to ensure ISPs include services provided through IDEA funds and the next regularly scheduled annual review meetings must have the services documented in the ISPs.

Finding 3: The district did not consistently provide parents of students eligible for special education and related services, as well as, students eligible for speech-language services notice of a meeting for identification, eligibility and reevaluation planning meetings.

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

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Required Action: The district must ensure parents are provided notice of a meeting, containing 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 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 meetings conducted between May 2017 and November 2017, and to review the oversight procedures.

Finding 4: The district did not provide to students eligible for special education and related services written notice of graduation within required timelines.

Citation: N.J.A.C. 6A:14-4.11(b).

Required Action: The district must ensure parents or adult students are provided with written notice of graduation containing all required components 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 interview staff, review written notice of graduation provided to eligible students who will graduate at the conclusion of the current school year, and to review the oversight procedures.

Finding 5: The district did not provide a summary of academic achievement and functional performance prior to graduating and/or aging out to students eligible for special education and related services.

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

Required Action: The district must ensure students are provided with their summary of academic achievement and functional performance prior to graduation that addresses all required components prior to graduation and/or exiting. 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 the summary of academic achievement and functional performance provided to eligible students at the conclusion of the current school year, and to review the oversight procedures.

Finding 6: The district did not document all required considerations and statements in each Individualized Education Program (IEP). IEPs for students eligible for special education and related services did not include measurable post-secondary goals based on age appropriate transition assessments.

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Citation: N.J.A.C. 6A:14-3.7(c)1-11, (e) 1-17, and (f); 20 U.S.C. §1414(d)(3)(A)(B); and 34 CFR §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 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, a random sample of additional IEPs developed at meetings conducted between May 2017 and November 2017, 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 correction of noncompliance, the district is referred to the state IEP sample form which is located at: www.state.nj.us/education/specialed/form.

Finding 7: The district did not consistently document in the IEPs of students who were removed from the general education setting for more than 20 percent of the school day, including student placed in separate settings, and consideration of placement in the least restrictive environment in the IEPs. Specifically, IEPs did not consistently include:

- a comparison of the benefits provided in the regular class and the benefits provided in the special education class;
- the potentially beneficial or harmful effects which a placement (general education) may have on the student with disabilities or the other students in the class; and
- for 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 (a)8(i),(ii), and (iii); and N.J.A.C. 6A:14-4.2 (a)4.

Required Action: The district must ensure that 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 who are placed in separate settings, the IEP team identified activities to transition the student to a less restrictive environment and document them in each IEP. In order to demonstrate correction of noncompliance, the district must conduct training for child study team members and develop an oversight mechanism to ensure compliance with the requirements in the citations listed above. To demonstrate the district has corrected the individual instances of noncompliance, the district must conduct annual review meetings and revise the IEPs for the specific students identified as noncompliant. A monitor from the NJDOE will conduct an on-site visit to interview staff and review the following: revised IEPs, a random sample of additional IEPs developed at meetings conducted between May 2017 and November 2017, and to review the oversight

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procedures. The names of the students whose IEPs were identified as noncompliant will be provided to the district by the monitor.

Finding 8: The district did not consistently provide written invitations to meetings where post-school transition was being discussed to students beginning at age 14.

Citation: N.J.A.C. 6A:14-2.3(k)2x and 34 CFR §300.322.(b)(2).

Required Action: The district must ensure each student with an IEP age 14 or above is provided with a written invitation to any IEP meeting where transition to adult life will be discussed. 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 copies of invitations to IEP meetings to students age 14 and above for meetings conducted between May 2017 and November 2017, and to review the oversight procedures.

Finding 9: The district did not consistently conduct all required sections of the functional assessment as a component of initial evaluations for students referred for special education and related services and for students referred for speech-language services. Specifically, evaluation reports did not contain an observation of the student in other than a testing setting.

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 the initial evaluation process. 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 initial evaluation reports completed between May 2017 and November 2017, and to review the oversight procedures.

Finding 10: The district did not consistently conduct multidisciplinary initial evaluations for students referred for speech-language services by obtaining an educational impact statement from the classroom teacher.

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

Required Action: The district must ensure a multidisciplinary evaluation is conducted for students referred for speech-language services by obtaining a statement from the general education teacher that details the educational impact of the speech problem on the student's progress in general education. In order to demonstrate correction of noncompliance, the district must conduct training for speech-language specialists and develop an oversight mechanism to ensure compliance with the requirements in the

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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 May 2017 and November 2017, 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.

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:3-1.3.

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

**GLOUCESTER CITY BOARD OF EDUCATION
GLOUCESTER CITY, NEW JERSEY 08030**

APRIL 11, 2017

SECRETARY'S REPORT

Upon the Superintendent's recommendation, Motion by Mrs. Borger, seconded by Mrs. Cohan to approve the following Grants Action Item. RCV#9 8 votes yes, 2 members absent. Motion approved.

2. **Accept IDEA Consolidated Monitoring Report**

Recommend the Board accept the March 2017 Consolidated Monitoring Report of IDEA Basic and IDEA Pre-School Federal Aid Programs for the Gloucester City School District, which was conducted by the NJ Department of Education Office of Fiscal Accountability and Compliance. The audit report was officially presented to the Board of Education, any recommendations were read and discussed, and a summary or synopsis was made available for public distribution. (Exhibit APRIL-5f)

3. **Approve IDEA Consolidated Monitoring Report Corrective Action Plan**

Recommend the Board approve the Corrective Action Plan for the March 2017 Consolidated Monitoring Report of IDEA Basic and IDEA Pre-School Federal Aid Programs for the Gloucester City School District, which was conducted by the NJ Department of Education Office of Fiscal Accountability and Compliance. (Exhibit APRIL-5g)

Corrective Action Plan – IDEA Consolidated Monitoring Report March 2017

Name of School:	Gloucester City School District
Type of Audit:	Consolidated Monitoring Report March 2017 IDEA Basic & IDEA Preschool
Date of Board Meeting:	April 11, 2017
Contact Person:	Amy Francis, Director of Special Services
Telephone #:	856-456-7000 ext. 2168

This is to certify that the above Motion was passed by the Gloucester City Board of Education at the APRIL 11, 2017 Board Meeting.


Margaret M. McDonnell, Secretary

**New Jersey Department of Education Office of Fiscal Accountability and Compliance
Corrective Action Plan**

School District Name: Gloucester City Public Schools 07-1770 County of Camden
Type of Examination: Consolidated Monitoring - IDEA
Date of Board Meeting: April 11, 2017
Contact: Joseph G. Rafferty, Superintendent Phone: 856-456-7000 ext 2166 Fax: 856-742-8815

#	Recommendation Number / Finding	Required Action	Corrective Action	Method of Implementation	Individual(s) Responsible for Implementation	Completion Date of Implementation
1	District included students' names on purchase orders for students educated in tuition placements; therefore, violating student confidentiality.	The district must revise procedures to ensure confidentiality of student information is maintained and only persons having educational responsibility for those students have access to this information. Revised procedures must be submitted to the NJDOE for review.	The district will revise procedures for Tuition Purchase Order set up to exclude student names from Purchase Orders. Revised procedures must be submitted to the NJDOE for review.	Names will be excluded from Purchase Orders for Tuition Contracts. NJSID Numbers will be used.	Business Administrator Business Office Tuition Processing Staff	June 30, 2017
2	District provides a language arts teacher and a mathematics teacher for in-class resource to nonpublic students at Gloucester Catholic High School, but these services are not included on the Individual Student Plans(ISPc) of students receiving these services. A requirement of the IDEA grant is that ISPs of students must identify services provided with IDEA funds.	The services listed in the ISPs to be provided through the IDEA grant need to match the services listed in the IDEA grant application. The provision of in-class resource provided by a language arts teacher or a mathematics teacher must be delineated in the ISPs. The district must develop procedures to ensure ISPs include services provided through IDEA funds and the next regularly scheduled annual review meetings must have the services documented in the ISPs.	The district along with Camden County Educational Services will revise procedures to ensure that the ISPs of students identify which services are IDEA services.	The Supervisor of Related Services at Camden County Educational Services will provide designated staff at Gloucester City School District with access to Realtime. The designated staff at GCSD will conduct a monthly check/audit of ISPs via Realtime to ensure IDEA services are properly documented. A form will be used to document the reviewed ISPs.	Supervisor of Related Services-CCES, Designated staff at Gloucester City School District as chosen by the Supervisor of Special Services.	June 30, 2017

**New Jersey Department of Education Office of Fiscal Accountability and Compliance
Corrective Action Plan**

School District Name: Gloucester City Public Schools 07-1770 County of Camden
 Type of Examination: Consolidated Monitoring - IDEA
 Date of Board Meeting: April 11, 2017
 Contact: Joseph G. Rafferty, Superintendent Phone: 856-456-7000 ext 2166 Fax: 856-742-8815

#	Recommendation Number / Finding	Required Action	Corrective Action	Method of Implementation	Individual(s) Responsible for Implementation	Completion Date of Implementation
3	District did not consistently provide parents of students eligible for special education and related services, as well as, students eligible for speech-language services notice of a meeting for identification, eligibility and reevaluation planning meetings.	District must ensure parents are provided notice of a meeting, containing 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 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 meetings conducted between May 2017 and November 2017, and to review the oversight procedures.	The district will revise the procedures for notifying the parents (IEP and Speech-language) of any meetings. The district will also implement oversight procedures to ensure all parents are provided notice of meetings as stipulated by code. Training was provided to speech therapists on 3/23/2017 and CST members on 3/24/2017.	The CST will develop an IEP Review Checklist as an oversight mechanism. IEP files will be reviewed and the checklist completed monthly.	Supervisor of Special Services, CST members and speech therapists, administrative assistant	June 30, 2017

**New Jersey Department of Education Office of Fiscal Accountability and Compliance
Corrective Action Plan**

School District Name: Gloucester City Public Schools 07-1770 County of Camden
 Type of Examination: Consolidated Monitoring - IDEA
 Date of Board Meeting: April 11, 2017
 Contact: Joseph G. Rafferty, Superintendent Phone: 856-456-7000 ext 2166 Fax: 856-742-8815

#	Recommendation Number / Finding	Required Action	Corrective Action	Method of Implementation	Individual(s) Responsible for Implementation	Completion Date of Implementation
4	District did not provide to students eligible for special education and related services written notice of graduation within required timelines.	The district must ensure parents or adults are provided with written notice of graduation containing all required components 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 interview staff, review written notice of graduation provided to eligible students who will graduate at the conclusion of the current school year, and to review the oversight procedures.	The district will revise and implement new procedures as to the notification of graduation given to students in the form of the DOE approved letter. Training was conducted on 3/24/2017.	The district's new procedures will include the DOE approved letter that will be mailed to the student along with the final IEP and summary of performance. This will include the student signature, acknowledging the review. CST members will utilize the newly created IEP Review Summary form to ensure proper and consistent implementation.	Supervisor of Special Services, CST members, administrative assistant	June 30, 2017

**New Jersey Department of Education Office of Fiscal Accountability and Compliance
Corrective Action Plan**

School District Name: Gloucester City Public Schools 07-1770 County of Camden

Type of Examination: Consolidated Monitoring - IDEA

Date of Board Meeting: April 11, 2017

Contact: Joseph G. Rafferty, Superintendent Phone: 856-456-7000 ext 2166 Fax: 856-742-8815

#	Recommendation Number / Finding	Required Action	Corrective Action	Method of Implementation	Individual(s) Responsible for Implementation	Completion Date of Implementation
5	District did not provide a summary of academic achievement and functional performance prior to graduating and/or aging out to students eligible for special education and related services.	The district must ensure students are provided with their summary of academic achievement and functional performance prior to graduation that addresses all required components prior to graduation and/or exiting. 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 the summary of academic achievement and functional performance provided to eligible students at the conclusion of the current school year, and to review the oversight procedures.	The district will revise and implement new procedures as to the Summary of Academic Achievement and Functional Performance given to students prior to graduation. Training was conducted on 3/24/2017	The district's new procedures will include the use of the DOE approved Summary of Performance form, which will be mailed to the students along with final IEP and Notification of Graduation. The CST members will be responsible for reviewing IEP files monthly and completing the IEP Summary Checklist to ensure all required components are included in the file.	Supervisor of Special Services, CST members, administrative assistant	June 30, 2017

**New Jersey Department of Education Office of Fiscal Accountability and Compliance
Corrective Action Plan**

Gloucester City Public Schools 07-1770 County of Camden

Consolidated Monitoring - IDEA

April 11, 2017

Joseph G. Raifferty, Superintendent Phone: 856-456-7000 ext 2166 Fax: 856-742-8815

School District Name:

Type of Examination:

Date of Board Meeting:

Contact:

#	Recommendation Number / Finding	Required Action	Corrective Action	Method of Implementation	Individual(s) Responsible for Implementation	Completion Date of Implementation
6	<p>District did not document all required considerations and statements in each Individualized Education Program(IEP). IEPs for students eligible for special education and related services did not include measurable post-secondary goals based on age appropriate transition assessments.</p>	<p>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, a random sample of additional IEPs developed at meetings conducted between May 2017 and November 2017, 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 correction of noncompliance, the district is referred to the state IEP sample form which is located at: www.state.nj.us/education/speciald/form.</p>	<p>The district will develop a method of documenting all transition assessment activities. All IEPs cited will be corrected by the next annual review meeting. CST training was held on 3/24/17.</p>	<p>The district will develop a transition summary form, which will include and document all age appropriate transition assessments plus post secondary goals. Students and case manager will sign the form.</p>	<p>Supervisor of Special Services, CST Members, Guidance Counselors, Administrative Assistants</p>	<p>June 30, 2017</p>

New Jersey Department of Education Office of Fiscal Accountability and Compliance
Corrective Action Plan

Gloucester City Public Schools 07-1770 County of Camden

Consolidated Monitoring - IDEA

April 11, 2017

Joseph G. Rafferty, Superintendent Phone: 856-456-7000 ext 2166 Fax: 856-742-8815

School District Name:

Type of Examination:

Date of Board Meeting:

Contact:

#	Recommendation Number / Finding	Required Action	Corrective Action	Method of Implementation	Individual(s) Responsible for Implementation	Completion Date of Implementation
7	District did not consistently document in the IEPs of students who were removed from the general education setting for more than 20 percent of the school day, including student placed in separate settings, and consideration of placement in the least restrictive environment in the IEPs. Specifically, IEPs did not consistently include: a comparison of the benefits provided in the regular class and the benefits provided in the special education class; the potentially beneficial or harmful effects which a placement(general education) may have on the student with disabilities or the other students in the class; and for those students placed in separate settings, activities to transition the student to a less restrictive environment.	The district must ensure that 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 who are placed in separate settings, the IEP team identified activities to transition the student to a less restrictive environment and document them in each IEP. In order to demonstrate correction of noncompliance, the district must conduct training for child study team members and develop an oversight mechanism to ensure compliance with the requirements in the 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 the specific students identified as noncompliant. A monitor from the NJDOE will conduct an on-site visit to interview staff and review the following: revised IEPs, a random sample of additional IEPs developed at meetings conducted between May 2017 and November 2017, 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.	The district will revise procedures to ensure that when drafting an IEP, placement in the general education setting is considered first and properly documented in the correct section of the IEP. In addition, revised procedures will be implemented to document activities necessary to transition a student to the least restrictive environment when necessary. Training was held on 3/24/2017. All IEPs that were identified as needing corrections will be corrected by the next scheduled annual review meeting.	The district will develop an IEP Review Checklist to document proper citing of the Least Restrictive Environment for students whose placement in the general education setting is less than 80%.	Supervisor of Special Services, CST members, administrative assistant	June 30, 2017

**New Jersey Department of Education Office of Fiscal Accountability and Compliance
Corrective Action Plan**

Gloucester City Public Schools 07-1770 County of Camden

Consolidated Monitoring - IDEA

April 11, 2017

Joseph G. Rafferty, Superintendent Phone: 856-456-7000 ext 2166 Fax: 856-742-8815

School District Name:

Type of Examination:

Date of Board Meeting:

Contact:

#	Recommendation Number / Finding	Required Action	Corrective Action	Method of Implementation	Individual(s) Responsible for Implementation	Completion Date of Implementation
8	District did not consistently provide written invitations to meetings where post-school transition was being discussed to students beginning at age 14.	The district must ensure each student with an IEP age 14 or above is provided with a written invitation to any IEP meeting where transition to adult life will be discussed. In order to demonstrate correction of noncompliance, the district must conduct training for child study team members and develop and oversight mechanism to ensure compliance with the requirements in the citations. A monitor from the NJDOE will conduct an on-site visit to interview staff, review copies of invitations to IEP meetings to students age 14 and above for meetings conducted between May 2017 and November 2017, and to review oversight procedures.	The district will revise procedures to ensure that all students, beginning age 14, will be invited to any IEP where transition will be discussed via a letter mailed to their home. Training was conducted on 3/24/2017.	The district will send a separate letter to all students who are age eligible according to the code, inviting them to attend their IEP meetings. Transition activities will be discussed with the students at their meetings and a copy of the meeting notice will be placed in their IEP files. The IEP Summary Checklist will be used as a compliance mechanism to ensure notice is given to all age eligible students consistently.	Supervisor of Special Services, CST members, administrative assistant	June 30, 2017

**New Jersey Department of Education Office of Fiscal Accountability and Compliance
Corrective Action Plan**

Gloucester City Public Schools 07-1770 County of Camden

Consolidated Monitoring - IDEA

April 11, 2017

Joseph G. Rafferty, Superintendent Phone: 856-456-7000 ext 2166 Fax: 856-742-8815

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9	The district did not consistently conduct all required sections of the functional assessment as a component of initial evaluations for students referred for special education and related services and for students referred for speech-language services. Specifically, evaluation reports did not contain an observation of the student in other than a testing setting.	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 child study team members and speech-language specialists and develop an oversight mechanism to ensure compliance with the requirements in the citations. A monitor from the NJDOE will conduct an on-site visit to interview staff, review initial evaluation reports completed between May 2017 and November 2017, and to review oversight procedures.	The district will revise procedures and put into place a compliance mechanism to ensure every required component of an assessment is completed, especially an observation of the student in a no-testing situation. Training was conducted on 3/23/2017 and 3/24/2017.	The district will develop an Electronic CST Evaluation spreadsheet to include both formative and functional assessment pieces. The form will be used to document which team member has been assigned which assessment piece. The CST will then add the date of completion to the form when completed. The administrative assistant will be responsible to completing compliance checks and notifying the Supervisor of Special Services and the team members should an assessment piece not be completed.	Supervisor of Special Services, CST Members, Speech Therapists, Administrative Assistant	June 30, 2017

**New Jersey Department of Education Office of Fiscal Accountability and Compliance
Corrective Action Plan**

School District Name: Gloucester City Public Schools 07-1770 County of Camden
 Type of Examination: Consolidated Monitoring - IDEA
 Date of Board Meeting: April 11, 2017
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#	Recommendation Number / Finding	Required Action	Corrective Action	Method of Implementation	Individual(s) Responsible for Implementation	Completion Date of Implementation
10	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.	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 citations. A monitor from the NJDOE will conduct an on-site visit to interview staff, review initial evaluation reports completed between May 2017 and November 2017, and to review oversight procedures.	The district will revise procedures to ensure speech therapists along with the teacher are consistently completing the Educational Impact Statement form after parental consent is obtained. A form will be used as an oversight mechanism to ensure compliance. Training completed on 3/23/2017.	The district will utilize a DOE approved form to be completed by the teacher after parental consent is obtained. The form will then be placed in the student's IEP folder.	Supervisor of Special Services, Speech Therapists, Administrative Assistant	June 30, 2017

Superintendent:  Date: 4/11/2017
 Business Administrator:  Date: 4/11/2017