



State of New Jersey

DEPARTMENT OF EDUCATION

PO Box 500

TRENTON, NJ 08625-0500

CHRIS CHRISTIE
Governor

KIM GUADAGNO
Lt. Governor

CHRISTOPHER D. CERF
Acting Commissioner

May 26, 2011

Mr. Robert L. Copeland, Superintendent
1515 Stelton Road
PO Box 1332
Piscataway, NJ 08855-1332

Dear Mr. Copeland:

The New Jersey Department of Education has completed a review of funds received and disbursed from one or more federal programs by the **Piscataway Township Board of Education**. The funding sources reviewed include titled programs for the American Recovery and Reinvestment Act (ARRA) in particular, and/or No Child Left Behind Act (NCLB), the Individuals with Disabilities Education Act (IDEA) and State Fiscal Stabilization Funds (Education Stabilization Fund and Government Stabilization Fund). The review covered the period July 1, 2009 through June 30, 2010. The resulting report is enclosed. Please provide a copy of the report to each board member. All issued ARRA monitoring reports will be posted on the department's website at <http://www.nj.gov/education/arra/>.

Utilizing the process outlined in the attached "Procedures for LEA/Agency Response, Corrective Action Plan and Appeal Process," the Piscataway Township Board of Education is required, pursuant to N.J.A.C. 6A:23A-5.6, to publicly review and discuss the findings in this report at a public board meeting no later than 30 days after receipt of the report. Within 30 days of the public meeting, the board must adopt a resolution certifying that the findings were discussed in a public meeting and approving a corrective action plan which addresses the issues raised in the undisputed findings and/or an appeal of any **monetary** findings in dispute (emphasis added). A copy of the resolution and the approved corrective action plan and/or appeal must be sent to this office within 10 days of adoption by the board. Direct your response to my attention.

Also, pursuant to N.J.A.C. 6A:23A-5.6(c), you must post the findings of the report and the board's corrective action plan on your school 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 Ronald Fisher at (609) 777-3723.

Sincerely,

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

RJC/LDM/Piscataway Twp. BOE Cover Letter
Enclosures

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PISCATAWAY TOWNSHIP BOARD OF EDUCATION
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American Recovery & Reinvestment Act 2009
New Jersey K-12 Education

ARRA MONITORING REPORT
MAY 2011

District: Piscataway Township Board of Education
County: Middlesex
Dates On-Site: February 22 and 23, 2011
Case #: ARRA-067-09

FUNDING SOURCES

Program	Funding Award
State Fiscal Stabilization Fund - Education Stabilization Fund	\$1,679,933
State Fiscal Stabilization Fund - Government Services Fund	65,033
Education Jobs Fund	556,854
ARRA-IDEA Basic	1,910,881
ARRA-IDEA Preschool	68,989
Total ARRA Funds	\$4,281,690
Title I	\$327,747
Title I SIA	-
Title II Part A	177,439
Title II Part D	3,226
Title III	66,840
Title IV	15,320
IDEA Basic	1,695,125
IDEA Preschool	50,217
Total Non-ARRA Funds	\$2,335,914
Total Funding	\$6,617,604

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BACKGROUND

The *American Recovery and Reinvestment Act of 2009* (ARRA) and other federal laws require local education agencies (LEAs) to provide programs and services to their schools based on the requirements specified in each of the authorizing statutes (ESEA, IDEA and ARRA). The laws further require that state education agencies such as the New Jersey Department of Education (NJDOE) monitor the implementation of federal programs by sub recipients and determine whether the funds are being used by the district for their intended purpose and achieving the overall objectives of the funding initiatives.

INTRODUCTION

The NJDOE visited the Piscataway Township Board of Education to monitor the district's use of ARRA funds and the related program plans, where applicable, to determine whether the district's programs are meeting the intended purposes and objectives, as specified in the current year applications and authorizing statutes, and to determine whether the funds were spent in accordance with the program requirements, federal and state laws, and applicable regulations. The on-site visit included staff interviews and documentation reviews related to the requirements of the following programs: State Fiscal Stabilization Funds (SFSF) including the Education Stabilization Fund (ESF) and Government Services Fund (GSF); Education Jobs Fund (EJF): Title I; Title II, Parts A and D; Title III; Title IV; IDEA Basic; IDEA Preschool; ARRA-IDEA Basic; and ARRA-IDEA Preschool for the period July 1, 2009 through June 30, 2010. The monitoring also included a review of the district's most recent ARRA and EJF section 1512 and cash management quarterly reports to determine whether expenditures, jobs estimates and related information were reported accurately.

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 current district policies and procedures. The monitoring team members also conducted interviews with district personnel, reviewed the supporting documentation for a sample of expenditures and conducted internal control reviews.

EXPENDITURES REVIEWED

The following dollar amounts of expenditures were reviewed for each program monitored for the period of July 1, 2009 through June 30, 2010:

- ESF benefits expenditures totaling \$1,679,933 were reviewed;
- GSF benefits expenditures totaling \$65,033 were reviewed;
- EJF benefits expenditures totaling \$556,854 were reviewed;
- ARRA-IDEA Basic expenditures totaling \$607,108 were reviewed;
- ARRA-IDEA Preschool expenditures totaling \$62,134 were reviewed;
- Title I expenditures totaling \$192,932 were reviewed;
- Title II, Part A expenditures totaling \$71,300 were reviewed;
- Title II, Part D expenditures totaling \$2,748 were reviewed;
- Title III expenditures totaling \$48,801 were reviewed;

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- Title IV expenditures totaling \$13,000 were reviewed;
- IDEA Basic expenditures totaling \$239,560 were reviewed; and
- IDEA Preschool expenditures totaling \$8,232 were reviewed.

GENERAL DISTRICT OVERVIEW OF USES OF TITLE I AND IDEA FUNDS

Title I, Part A

The Title I, Part A funds were utilized for: Teacher and Support Specialist salaries and benefits; Professional Development; and After School and Summer Enrichment Programs.

Salaries and Benefits

Funds were utilized for the salaries and benefits of three support specialist positions in grades K-5. During teacher planning and prep times, the specialists provided focused assistance in the development of lesson plans. Specifically, the specialists assisted the teachers in incorporating formative assessments into the lessons as a way for teachers to gather data on an ongoing basis during their instructional time. Once data was obtained, the support specialists instructed the teachers on how to analyze the data and use this information to change instructional practices. The support specialists modeled best practices instruction for the teachers, having teachers pay close attention to areas that had been agreed upon as improvement areas. These support specialists also provided individual and small group targeted and intensive interventions with students. Finally, the support specialists worked with parents, by providing workshops on language arts literacy and reading aligned to the Core Curriculum Content Standards. A portion of the workshops was devoted to helping parent's foster home interventions that correlated to the standards and the instructional practices of the classroom teachers.

In addition, funds were utilized to support the salaries and benefits of two middle school teachers. Using READ 180, one teacher provided intensive language arts literacy and reading support to students with disabilities, as well as students in economically disadvantaged disaggregated groups (i.e., students who scored 184 or below on the NJ ASK). Student growth was measured using the Scholastic Reading Inventory (SRI), literacy benchmark assessments, and READ 180 data reports on skill development, reading fluency, and reading comprehension. The NJ ASK was used as the summative assessment of literacy growth in cluster areas.

The other middle school teacher was a highly qualified endorsed ESL teacher who worked directly with ELL beginning language acquisition students in an intensive language intervention ESL Jumpstart program for two hours a day. Instruction was supported by the use of READ 180 and Rosetta Stone. Students' progress in language acquisition was measured by the SRI and the state mandated ACCESS test. Data analysis for instructional planning was electronically available in both programs. Students transitioned from this program to a split one hour academic literacy class and continued support in this ESL Jumpstart program until they exited to a general education schedule with ESL push-in content support. ACCESS continued as a summative assessment in Teachers of English to Speakers of Other Languages standards (speaking, listening, reading, and writing in English) in addition to NJ ASK 6-8.

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Professional Development

The instructional areas specifically emphasized for professional development included the following areas:

- Balanced Literacy (K-5) – Teachers were introduced to a leveled reading program that included the five research based literacy areas, as well as how to incorporate these literacy elements in all academic subjects. Emphasis was placed on the importance of comprehension strategies as teachers learned methods to build student background knowledge. A significant portion of the professional development was devoted to showing teachers how to collect and analyze data on an ongoing basis. Special attention was given to instructing teachers how to use and implement error analysis on Running Records. Student growth was measured using Running Records, district benchmarks, district learning targets, and NJ ASK and S-Test cluster scores.
- College Board/Spring Board – This literacy program was adopted for middle school grades to provide a researched based, guaranteed, and viable curriculum in literacy that was aligned to the New Jersey Core Curriculum Content Standards and the national Common Core Standards. Teachers were shown how to implement specific strategies, along with the associated embedded assessments, during individual and small group instructional time. This professional development provided teachers with strategies and resources for content and skill development in literacy, as well as methods to implement to ensure that learning was student-centered and incorporated continual skill analysis.

The district measured the success of these professional development opportunities by having the teachers fully integrate these new instructional strategies and practices in their daily lesson plans, which were reviewed by the assistant superintendent for curriculum and instruction, as well as the building principals.

After School and Summer Enrichment Programs

Title I funds were allocated for after school and summer enrichment programs for identified struggling learners (i.e., students who did not make proficiency levels on the NJ ASK).

The after school programs allowed teachers to provide tutorial services in the areas of mathematics and language arts literacy and reading. Information from each session was shared with parents and the classroom teachers. Although instruction was centered on mathematics and language arts literacy and reading, students also were provided instruction in problem solving skills, organizational management, social skill development, and writing across the curriculum. Student growth was measured by teacher made assessments, student work, and parent input.

The summer enrichment program was held during a five week period from June 2010 to July 2010. Students were provided additional instruction in the areas of mathematics and language arts literacy and reading. Individual and small group instructional plans for students were created using data from both formative and summative assessments and student work. Gains in

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achievement were assessed through multiple measures that included the following: class grades, teacher observations, student work, and parent feedback.

ARRA-IDEA Basic and ARRA-IDEA Preschool

The ARRA-IDEA Basic funds were utilized to support six new special education programs: Elementary Behavioral Disability, Middle School Behavioral Disability, Elementary and High School Autism Programs, School-to-Work Program for special education students between 18-21 years and an Algebra II Resource Program. The program support includes partially funded staff (behaviorist, two psychologists, nurse, and special education supervisor), staff professional development, furniture, supplies, equipment, mathematics and language arts literacy software, and field trip incentives for the Behavioral Disabilities Program.

Early Intervening Services are also included in the grant expenditures. The district is implementing Response to Intervention (RTI) and will purchase the RTI/EXCEED software to track interventions and the effectiveness of the interventions. They are implementing a process to track student achievement by school and examine the achievement gap. The behaviorist will work with students and teachers to maintain students in their classrooms with effective plans to reduce referrals. The district has also established a program to address the mental health issues that impact students' lives and their ability to perform optimally in school. Nonpublic services are provided through the Middlesex Regional Educational Services Commission.

Expectations and Benefits

Least Restrictive Environment (LRE) – The goal is to increase the number of students included in the general education program and to provide an ongoing staff development program in the various inclusion models to increase the number of students placed in general education classes with support.

Additionally, the goal is to decrease the number of students placed in out-of-district programs specifically through:

- An in-district middle school program for the moderately behaviorally impaired to bring back three students in district and prevent two more students from being sent out of the district.
- An in-district elementary program for the moderately behaviorally impaired to bring back one student in district and prevent three more students from being sent out of the district.
- An in-district elementary program for autistic students to prevent five students from being sent out of the district.
- An in-district high school program for autistic students to prevent four students from being sent out of the district.

The ARRA-IDEA Preschool funds were utilized for supplies and materials for the district's Early Childhood Center for preschool disabled and preschool inclusion classes.

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IDEA Basic and IDEA Preschool

The IDEA Basic funds were utilized for out-of district tuition for students eligible for special education and related services. The district contracts with Middlesex Regional Educational Services Commission for nonpublic services. The basic nonpublic services provided include speech, in-class support, paraprofessionals, counseling, professional development, occupational and physical therapy, in-class support, resource center and instructional materials.

Expectations and Benefits

The case managers visit the out-of-district-placement at least three times a year to review the delivery of a Free Appropriate Public Education in the LRE. Managers will maintain supervision of placement numbers that may require the development of in-district programs to assure LRE.

The IDEA Preschool funds were utilized for out-of-district tuition for preschool disabled students. The Preschool nonpublic services are provided through the Middlesex Regional Educational Services Commission.

DETAILED FINDINGS AND RECOMMENDATIONS

Title I

Finding 1:

Condition: The district did not consult with the nonpublic schools outside the district boundaries in which district students were enrolled, as required under Title I, Part A.

Citation: *NCLB §1120 and 9501 Participation of Children Enrolled in Private School.*

Required Action: The district must establish policies and procedures to ensure that the consultation process with those nonpublic schools that enroll district students who reside within the boundaries of the district's eligible school attendance areas meets all requirements as stipulated in the Title I, Part A regulations, and these requirements shall continue throughout the implementation and assessment of activities under Title I, Part A. The district must submit these policies and procedures to the NJDOE for review.

Finding 2:

Condition: The district did not enter the number of resident nonpublic school students for each school attendance area listed on the Title I Eligibility Step 1 screen in the FY 2010 *No Child Left Behind (NCLB)* Amendment Application. The Title I, Part A regulations stipulate that the district is responsible for counting and entering the total nonpublic school enrollment data and the total low-income counts for nonpublic school students who reside in the school attendance areas. By not entering this nonpublic school enrollment data, the allocations become skewed for

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each eligible Title I school attendance area and the low-income poverty percentages may be incorrect.

Citation: *NCLB §1120 Participation of Children Enrolled in Private School.*

Required Action: The FY 2010 *NCLB* Amendment Application will be reopened, to allow the district to enter the total nonpublic school enrollment data in the Title I Eligibility Step 1 screen. Upon completion of this data entry, the district must submit the amendment application for review and approval by the Office of Grants Management.

Finding 3:

Condition: The district did not allocate and budget the amount of FY 2009 carryover funds that were required for the Parental Involvement Restricted Reserve in the FY 2010 project period.

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

Required Action: The district must amend its FY 2010 *NCLB* Application to allocate and budget the required amount of FY 2009 carryover funds for the Restricted Reserve Parental Involvement. The district must submit the amendment application for review and approval by the Office of Grants Management.

Finding 4:

Condition: The district enrolled students from non-eligible Title I school attendance areas in its summer enrichment programs. Public school students who attend non-eligible Title I school attendance areas may not benefit from Title I funds and services.

Citation: *NCLB §1113: Eligible School Attendance Areas.*

Required Action: The district must establish policies and procedures to ensure that only students from eligible Title I school attendance areas receive benefit from the Title I funds and services. The district must submit these policies and procedures to the NJDOE for review.

ARRA-IDEA Basic and ARRA-IDEA Preschool

Finding 5:

Condition: The district's ARRA-IDEA Basic and ARRA-IDEA Preschool narrative plan does not reflect the budgeted expenditures for nonpublic services.

Citation: 34 CFR § 300.1 §300.202.

Required Action: The district's ARRA-IDEA Basic and ARRA-IDEA Preschool narrative plan must be revised to reflect the actual and budgeted nonpublic expenditures allowable under ARRA-IDEA.

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Finding 6:

Condition: The district provided a list of students identified for ARRA-IDEA Basic nonpublic services. The students Individual Service Plans (ISP) did not match the district service list or the services listed in the grant and did not identify ARRA as the funding source.

Citation: IDEA Regulations 34 CFR §300.130-300.144.

Required Action: The district must develop a separate list of nonpublic students and services for the ARRA-IDEA Basic grant that match both the services in the grant and service plans. The individual service plans must be revised to reflect the ARRA-IDEA Basic funding source.

Finding 7:

Condition: The ARRA-IDEA Basic grant includes expenditures under the general statement, “materials and supplies for the special education and inclusion classrooms.” The materials and supplies were not described in sufficient detail to determine if they are an allowable use of ARRA IDEA Funds. Additionally, the district did not identify the students or program that would utilize and benefit from the materials and supplies.

Citation: 34 CFR § 300.1 §300.202.

Required Action: The district’s ARRA-IDEA Basic narrative plan must be revised to include specific material and supplies and the educational use.

Finding 8:

Condition: The district’s ARRA-IDEA Basic narrative plan did not reflect budgeted expenditures for professional development and field trip incentives for the Behavioral Disability Program.

Citation: 34 CFR § 300.1 §300.202.

Required Action: The ARRA-IDEA Basic narrative plan must be revised to reflect and describe professional development activities and field trip incentives for the Behavioral Disability Program.

Finding 9:

Condition: The ARRA-IDEA Preschool budget section of the Electronic Web Enable Grant (EWEG) system must be revised to separate instructional and non-instructional supplies.

Citation: EDGAR 80.20, OMB A-87.

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Required Action: Instructional supplies must be entered on the 100-600 line in the budget summary and non-instructional supplies and material must be entered on the 200-600 line on the budget summary.

IDEA Basic and IDEA Preschool

The review in this area yielded no findings or recommendations.

Title II, Part A and D, Title III and Title IV

The review in this area yielded no findings or recommendations.

Financial Management and Reporting

The review in this area yielded no findings or recommendations.

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 Ronald Fisher at (609) 777-3723 or via email at ronald.fisher@doe.state.nj.us.