

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

SCHOOL DISTRICT NAME: Gloucester County Vocational-Technical School District

COUNTY: Gloucester

TYPE OF EXAMINATION: Consolidated Monitoring

CASE #: CM-020-14

DATE OF BOARD MEETING: January 20, 2016

CONTACT PERSON: Mr. Michael Dicken

TELEPHONE NUMBER: 856-468-1445 FAX: 856-468-3397

FINDING/ RECOMMENDATION NUMBER	FINDING	CORRECTIVE ACTION	METHOD OF IMPLEMENTATION	INDIVIDUAL RESPONSIBLE FOR IMPLEMENTATION	COMPLETION DATE OF IMPLEMENTATION
Finding #1 ESEA 1115: Targeted Assistance Programs	The district did not have a viable Title I program, and was unable to articulate how it used the Title I funds to provide services to the district's eligible, identified academically at-risk Title I students.	Title I funds will be utilized to offer an after school program, tutoring sessions during the day and an extended school year option, for the eligible, identified academically at-risk Title I students.	The Title I supplemental learning opportunities will be communicated to parents and students via meetings, letters, emails and school website. The after school program is offered by certified Title I teachers to eligible students Tuesday through Thursday from 2:30 – 6:00 PM. Students also have the option to meet with a Title I teacher during the day for club period and/or open periods. Title I teachers will develop Personalized Learning Plans and discuss with students. PLPs will be shared with parents and classroom teachers via email/Google docs. The district will offer an extended year program from July 11, 2016 – August 11, 2016 on Monday –Thursday from 9:00 AM – Noon.	Building Principal Assistant Superintendent, Curriculum & Assessment Chief Academic Officer Title I Teachers	June 2015 Extended School Year (ESY): August 2015

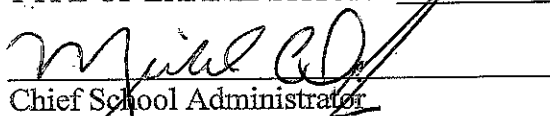
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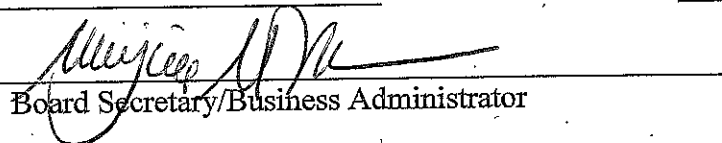
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Finding #2 ESEA 1115: Targeted Assistance Programs	The district did not provide evidence that multiple, educationally related objective criteria were applied to determine which students were eligible to receive Title I services. As described, the current Title I eligibility is based on one measure – Lexile scores through Achieve 3000 and mathematics levels through state assessments. The monitors were unable to verify if the district was actually serving its lowest-performing students based on multiple measures.	For the identified academically at-risk Title I ELA students, the educationally related objective criteria that was applied to determine Title I eligibility included Achieve3000 Lexile Scores <1050 for freshmen, <1080 for sophomores and <1185 for juniors and seniors, the Measurement of Academic Progress (MAP) <40 th percentile in language and reading, post test results from previous year, NJASK 7 for current freshmen and the PARCC assessment <750 in English Language Arts/ Literacy. For the identified academically at-risk Title I Math students, the educationally related objective criteria included the Measurement of Academic Progress (MAP) <40 th percentile in mathematics, post test results from previous year, NJASK 7 for current freshmen and the PARCC assessment <750 in Mathematics.	Generate a PowerSchool report for the identified criteria of Achieve3000, MAP and NJASK7, request post-tests results from previous year in ELA and math from respective coordinators. Establish a separate spreadsheet for eligible Title I ELA and mathematics students with the identified criteria and review with the Title I teachers. Notify parents via letter. Include PARCC results to identify any correlation in identification of at-risk students. Continue to monitor/analyze data via PowerSchool and LinkIT to determine eligibility.	Building Principal Assistant Superintendent, Curriculum & Assessment Chief Academic Officer Title I Teachers	January 2016 June 2016

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Finding #3 ESEA 1115: Targeted Assistance Schools ESEA 1118(c): Parental Involvement (Policy Involvement)	The district's Title I parental notification letter did not include the multiple, educationally related, objective entrance and exit criteria used for Title I student identification, the remediation actions the school is using, and the option for parents to opt-out of Title I services. This information is necessary for parents to understand the reasons their child was selected to participate in the Title I program, and what is needed for their child to exit the program.	The district will revise the Title I letter of student eligibility to include multiple, educationally related, objective entrance and exit criteria, the types of remediation offered throughout the year and an option for parents to opt-out of Title I services.	A copy of the revised FY 2016 Title I participation letter will be sent to the NJDOE for review. Once approved, the parents of eligible students for Title I services will be sent a letter of eligibility, along with the Parent Compact. The objective entrance and exit criteria for the multiple measures will be listed on the back of the letter.	Building Principal Assistant Superintendent, Curriculum & Assessment Chief Academic Officer	February 2016

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Finding #4 ESEA 1118(c)(1): Parental Involvement (Policy Involvement)	The district did not provide evidence of convening an annual Title I parent meeting in the beginning of the year. The district provided a meeting agenda for a parent meeting occurring in December; however, only one parent signed in and, the minutes provided did not specifically address the legislative requirements of the Title I annual parent meeting. Failing to conduct an annual meeting to explain the Title I legislation and the district's Title I programs in the beginning of the school year does not allow parents of identified Title I students to be informed and vested in the Title I process from the start.	The district convened the FY 2016 annual Title I meeting for the parents/guardians of identified Title I students on Thursday, September 10, 2015 at 4:00 PM to explain the Title I legislation and the district's Title I program. Two additional meetings are scheduled for February, 2016 and June, 2016	Submit the invitational letter, agenda and sign-in sheets for the September 10, 2015 annual Title I meeting to the NJDOE for review. Included on our school website is a PowerPoint presentation on Title I with video clips from our program and one of our Title I teachers. Provide the NJDOE the Title I letter, flyer and agenda that parents will receive for our February 2016 meeting for review. Provide the NJDOE the Title I letter, flyer and agenda that parents will receive for our June 2016 meeting for review. Conduct a school wide survey through the district website. Send out reminders to our parents through an email blast through Constant Contact.	Building Principal Assistant Superintendent, Curriculum & Assessment Chief Academic Officer Title I Teachers	September 2015 February 2016 June 2016

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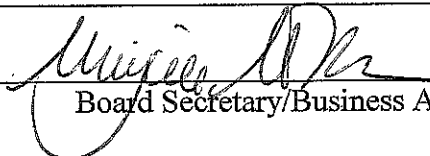
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<p>Finding #5</p> <p>OMB Circular A-87, Attachment B, Section 8(h): Cost Principles for State, Local and Indian Tribal Governments</p> <p>NCLB 1120(b): Fiscal Requirements (Federal Funds to Supplement, Not Supplant, Non- Federal Funds)</p>	<p>The district purchased 66 laptop computers, 30 graphing calculators, one LCD projector with software, and a smart response system with a receiver in the 2014-2015 grant year, but was unable to articulate how these purchases were being used to provide services to Title I students that were above and beyond the services received by non-Title I students. If the district decides to integrate the use of this technology into its Title I program, it must submit a formal plan to show how they will be used exclusively by the Title I students.</p>	<p>Submit a plan to the NJDOE outlining how the technology purchased with Title I grant funds was utilized for only Title I students.</p>	<p>The 66 laptops and 30 graphing calculators that were purchased with Title I funds were relocated to our media center for our Title I after school program. These items are only utilized by our identified, academically at-risk Title I students. The laptops and graphing calculators are kept in a secured media center room during the regular school day.</p>	<p>Building Principal</p> <p>Assistant Superintendent, Curriculum & Assessment</p> <p>Chief Academic Officer</p>	<p>September 2015</p>

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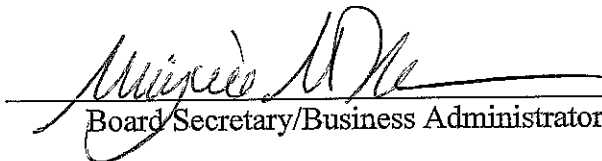
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Finding #6 ESEA §1120 A(b): Fiscal Requirements (Federal Funds to supplement, not Supplant, Non- Federal Funds	The district's use of Title I funds to pay for the stipends and benefits of teachers and administrators as literacy coaches, as well as a data analysis consultant supplanted state/local funds	Funds were re-allocated, all literacy coaches and the data analysis consultant were transferred out from Title I account. The funds expended were to provide services to at-risk students in the Math Success IV and V classes and the after school Title I Program. The business office reversed the ESEA cost to pay for the stipends and benefits of teachers and administrators as literacy coaches, as well as data analysis.	Updated/revised budget sheet reflecting the accounting changes.	Building Principal, Chief Academic Officer, Title I teachers, Project Manager and Grant Coordinator	June, 2015

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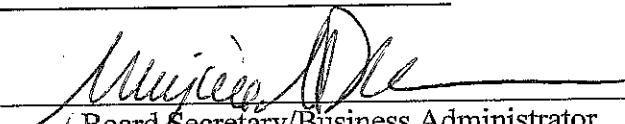
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Finding #7 ESEA §1120 A(b): Fiscal Requirements (Federal Funds to supplement, not Supplant, Non- Federal Funds	The district's use of Title I funds for registration cost for a Literacy Consortium supplanted state/local funds. This expenditure was unallowable, as the district was not able to articulate how these services benefited identified Title I students only.	The district will make the adjusting accounting entry for the expenditure.	Adjust budget sheet showing adjustment after guidance from district auditors and NJDOE.	Building Principal, Chief Academic Officer, Project Manager and Grant Coordinator	June, 2016

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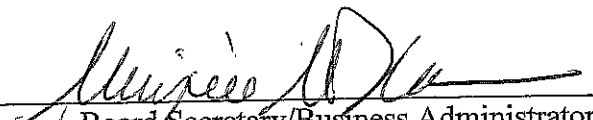
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Finding #8 IDEA Regulation 34 CFR 300.202 and 301 (Assistance to States for the Education of Children with Disabilities and Preschool Grants With Disabilities	The district expended funds for 188 laptop computers. A review of the locations for these laptops indicates that this is a non-allowable cost since it is supplanting, not supplementing, costs for students with disabilities	The business office reversed the IDEA costs for 30 computers where Special Education students were not the sole users. An inventory and tagging system by grant is in place to monitor equipment purchases.	Updated inventory controls documenting year purchased and current locations/and student assignment. Tags identifying year of purchase and grant.	Grant Coordinator Project Manager Director of Technology	June, 2015


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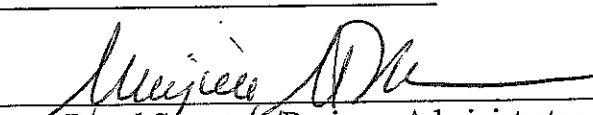
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CONTACT PERSON: Susan E. Heiken

TELEPHONE NUMBER: 856-468-1445 FAX: 856-468-3397

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Finding #9 N.J.A.C. 6A:14-3.7(c)1-11, (e) 1-17, and (f), 4.10(a); 20 U.S.C. §1414(d)(3)(A)(B); and 34 CFR §300.324(a)(1)(2)	IEP's did not consistently include: -liaison for postsecondary transition resources -goals and objectives for all pull out subjects	Student IEP's identified as noncompliant have been revised in accordance with NJ 6A:14-3.7.	The district has implemented the following: -staff development for CST staff -CST meeting checklist (including the three monitoring areas of noncompliance) for CST staff to sign off on.	Director of CS/Vocational Special Education	January, 2016

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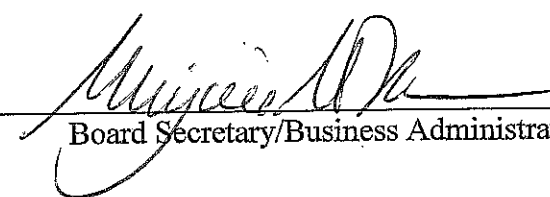
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Finding #10 N.J.A.C. 6A:14-3.7(c)1-11, (e) 1-17, and (f), 4.10(a); 20 U.S.C. §1414(d)(3)(A)(B); and 34 CFR §300.324(a)(1)(2)	Initial evaluations did not include the following: -written parental consent to conduct an initial meeting -minimum of two CST evaluations -observation of student in other than a testing setting	Written consent was obtained for the student IEP identified as noncompliant and all future evaluations are to include this, as well as a minimum of two CST evaluations, and an observation of student in other than a testing setting.	The district has implemented the following: -staff development for CST staff -CST meeting checklist (including the three monitoring areas of noncompliance) for CST staff to sign off on.	Director of CS/Vocational Special Education	January, 2016

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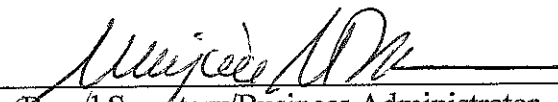
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Finding # 11 N.J.A.C. 5A:14- 1.2(h)	The district did not have in place a special education parent advisory group	The district formed a special education parent advisory group and held its first meeting on October 22, 2015	Parents/guardians were blindly selected from each grade and mailed invitations to participate.	Director of CS/Vocational Special Education	October, 2015

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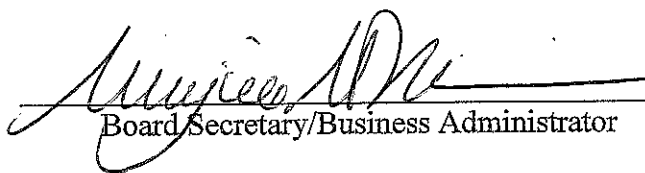
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Finding #12 N.J.A.C. 6A:14-2.3(k), 20 U.S.C. §1414(b)(4); and 34 CFR §300.321(a)	The district did not consistently convene identification, reevaluation planning, eligibility, and annual review meetings with required participants	No specific student IEP's were identified to the district as noncompliant, and therefore, all student IEP's are being reviewed by CST case-managers to assure compliance	The district has implemented the following: -staff development for CST staff -CST meeting checklist (including the three monitoring areas of noncompliance) for CST staff to sign off on.	Director of CS/Vocational Special Education	January, 2016

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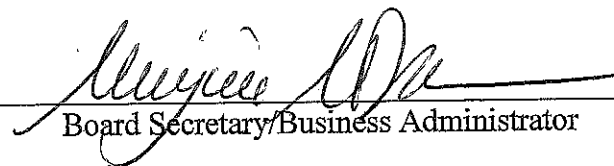
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Finding #13 P.L. 109 §§ 135(a): Local Uses of Funds (General Authority) and (b)(1): Requirements for Uses of Funds; Carl D. Perkins One-Year Grant Application Guidelines, July 1, 2014 – June 30, 2015 (Perkins Guidelines), Section A, 1.2: Perkins Grant Overview (Use of Funds by Local Entities)			An appeal has been written on behalf of the district for Finding #13		

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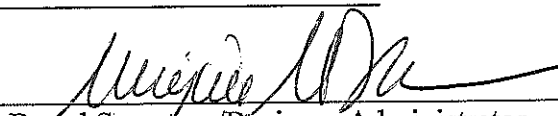
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Finding #14 P.O. 109 §§ 135(b)(3): Requirements for Uses of Funds Perkins. N.J.A.C. 6A:19-4: Structured Learning Experiences	The district did not provide evidence that students were given the opportunity to participate in structured learning experiences for all approved programs.	The School to Careers department will develop procedures to document and assure that all approved CTE programs have SLE.	Collect/maintain records of all CTE programs and their corresponding SLE agreements.	Director School to Careers	June, 2018

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CASE #: CM-020-14

DATE OF BOARD MEETING: January 20, 2016

CONTACT PERSON: Mr. Brian Shakespeare

TELEPHONE NUMBER: 856-468-1445 FAX: 856-468-3397

FINDING/ RECOMMENDATION NUMBER	FINDING	CORRECTIVE ACTION	METHOD OF IMPLEMENTATION	INDIVIDUAL RESPONSIBLE FOR IMPLEMENTATION	COMPLETION DATE OF IMPLEMENTATION
Finding #15 2 CFR §225 (OMB A-87), Attachment A, Section C.3.a.: Basic Guidelines (Allocable costs). 34 CFR § 80.23: Period of availability of funds			An appeal has been written on behalf of the district for Finding #15		

SUPPORTING DOCUMENTATION MUST BE SUBMITTED ALONG WITH THE CORRECTIVE ACTION PLAN

SCHOOL DISTRICT NAME: Gloucester County Vocational-Technical School District

COUNTY: Gloucester

TYPE OF EXAMINATION: Consolidated Monitoring

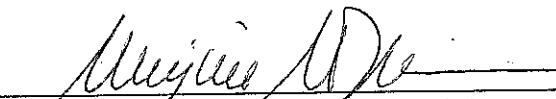
CASE #: CM-020-14



Chief School Administrator

1-21-16

Date



Board Secretary/Business Administrator

1/21/2016

Date